

INFORMATION MANAGEMENT

PERSONAL INFORMATION PROTECTION POLICY

Introduction

At The Sinneave Family Foundation (Sinneave), we understand that people entrust us with certain personal information in order for us to provide programs and services. This Policy is based on Generally Accepted Privacy Principles and Sinneave's commitment to implementing an effective privacy program for managing and preventing privacy risks. It applies to Sinneave's website, mobile apps and in-person and electronic exchanges of personal information with Sinneave.

This policy applies to Sinneave's staff, contractors and volunteers and to any person receiving services from Sinneave (herein after referred to as client). A copy of this policy is available on Sinneave's website and provided upon request.

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, identifying numbers, financial information, educational history, etc. Your personal information is collected to ensure that comprehensive consultation, services, and education can be provided. Personal information does not include anonymous or aggregate information that cannot be tracked back to an individual.

When you use Sinneave's website, we automatically receive and record information on our server logs from your browser or mobile platform, including your IP address, unique device identifier, and other device information (such as your operating system version and mobile network provider).

No data transmission over email can be guaranteed to be 100% secure. As a result, while Sinneave strives to protect personal information, we cannot guarantee the security of any information transmitted to us via email, and individuals do so at their own risk.

Policy

We collect, use, and disclose personal information to meet the following purposes:

Sinneave use of personal information

Information collected by Sinneave is used to assist in the delivery of our programs and services. In addition, this information is also used to communicate regarding other Sinneave programs, services, events, and educational information. Sinneave may use information collected to create non-identifying statistics to aid service, program development, and research analysis. These statistics are aggregated and anonymized and do not contain personally identifying information unless consent has been expressly granted.

We may collect, use, or disclose personal information only for the purpose for which the information was collected, except as authorized by law. We may not request consent to disclose information in the event of an emergency that threatens life, health, or safety.

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on clients to notify Sinneave if there is a change to their personal information that may affect their relationship

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with the organization. Sinneave requests that clients who are aware of an error in our information about them to please let us know and we will correct it wherever possible. In some cases, a written request for correction may be required.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected for legal or business purposes.

Sinneave disclosure of personal information

Within Sinneave, access to information is controlled. Personal information is disclosed on a need-to-know basis to staff, contractors, and agents who require the information to perform their assigned duties to ensure high-quality programs and services. Sinneave only shares personal information externally with your consent (such as when you request a disclosure) or with service providers who directly or indirectly assist us in providing Sinneave services. There are occasions when confidentiality must be waived. These include the following:

- If a staff member or contractor of Sinneave has reason to believe that an individual is a danger to themselves or others, they have a legal responsibility to report this to the appropriate authorities.
- If a file is subpoenaed in court, the information must be released.
- Information indicating child abuse or neglect must be reported to Child Welfare authorities.
- For individuals under 18 years of age or that have an appointed legal guardian, certain information may have to be shared with the parent/guardian.
- If a child/ward is participating in a Sinneave program, what a child/ward tells our staff and contractors will be treated as confidential unless a staff member determines that there are some risk factors that a parent/guardian need to know.

With written consent, Sinneave will forward information to a family physician or other third-party service provider to ensure appropriate ongoing monitoring and follow-up. Information will not be forwarded without consent. A client may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary for us to fulfil our legal obligations. Sinneave may not be able to provide clients with certain programs and services without necessary personal information.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Sinneave subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

Individuals may request access to your personal information using the Access to Personal Information Form (Appendix A).

A completed Access to Personal Information Form may be submitted by an Applicant in person, by mail (3rd Floor, 3820-24th Ave NW, Calgary, Alberta, T3B 2X9) or by email (privacy@sinneavefoundation.org).

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Due to the unreliable nature of electronic mail transmissions, which may be lost or misdirected by reason of network, hardware and software failures or other technical malfunctions, an e-mail message will not be considered to be received by Sinneave until an acknowledgement of the message is obtained by the Applicant.

We will respond to your request within 45 calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but no fees are charged to update your personal information or when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

Notes

Sinneave welcomes your comments regarding this Privacy Policy. Any requests for access to personal information and any questions or inquiries relating to privacy or data protection should be directed to our Privacy Officer at privacy@sinneavefoundation.org.

EU residents may also exercise their data subject rights by contacting our Privacy Officer, who is also Sinneave's Data Protection Officer.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue SW
Calgary, Alberta T2P 3W2
Phone: 403-297-2728
Email: generalinfo@oipc.ab.ca

Toll Free: 1-888-878-4044
Website: www.oipc.ab.ca

Policy History

Adopted: March 30, 2015

Amended: September 29, 2016, September 2019, September 2022

Policy Committee Scheduled Review: Summer 2024

Board of Directors Scheduled Review: Fall 2024

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Appendix A

Access to Personal Information Form

Date of Request: _____

Name of Requestor: _____

Requestor's Contact Information: (in order for Sinneave to verify your request)

Phone Number: _____

E-mail address: _____

Information being sought:

[Please provide sufficient detail in order to identify the records being sought, including names and dates].

Reason for request:

[Providing this information will help us identify other records that may be of interest to you].

Please provide my information at Sinneave's offices (an appointment will be confirmed).

Please send the requested information to the following address:

Please note the following:

- If we are able to provide you with access to your information:
 - We will attempt to do so within 45 days of your request. If we need longer to locate or gather your information, we will let you know.
 - There may be a charge associated with providing you access in order for us to recover costs incurred (for example, photocopying costs and staff time). You will be notified and asked to agree to such charges in advance of us incurring necessary costs.
- If we are unable to provide you with access to your information, we will provide you with a reason within 45 days of your request.