

<b>PRIVACY POLICY</b>		<b>Policy No.</b>
Date Approved	Date Last Reviewed	Approved By
June 25, 2013	June 25, 2013	Board of Directors

## **PURPOSE**

The purpose of this Privacy Policy is to fulfill our obligations as set out under the Personal Information Protection and Electronic Documents Act (PIPEDA).

## **POLICY**

Harmony Hall Centre for Seniors is committed to protecting the privacy of its members and other individuals about or from whom we collect personal information. Harmony Hall Centre for Seniors embraces the principles of the Canadian Standard Association Model Privacy Code for the Protection of Personal Information. This Privacy Policy describes the principles that Harmony Hall Centre for Seniors will use to protect the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it's confidentially protected and outlines rights with respect to this information. This privacy policy is applicable to our Members, Clients, Community Partners, Donors, Volunteers and Employees. Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, source of income, home addresses and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

## **PROCEDURES**

Our mandate is to maintain and enhance long-term relationships with our Members, Clients, Community Partners, Donors, Volunteers and Employees to support our Agency. We recognize that information is precious, and we are trusted to information appropriately; we are committed to protecting the confidentiality of this data. The following principles reflect our pledge to safeguard personal information:

### **1. We are accountable for personal information held by the Agency**

We are responsible for all personal information in our possession.

All employees, agents and authorized service providers of Harmony Hall Centre for Seniors are required to protect the confidentiality of personal information. We take every precaution to ensure confidentiality of information. The data provided to us is only for Harmony Hall Centre for Seniors' purposes, as outlined in section 2.

### **2. We collect, use and disclose personal information only for certain purposes**

We collect, use or disclose information only for use within Harmony Hall to:

- Offer programs and assistance
- Respond to information requests
- Emergency contact in case of accident, injury or illness while in our care

We obtain personal information lawfully and fairly. Personal information collected will be limited to that required for the purposes identified by us.

**3. We will obtain your consent**

We collect, use or disclose personal information only when we have consent to do so. Permission may be expressed orally, in writing or may be implied, and may be given to us orally, electronically or in writing.

Permission to collect, use and disclose personal information may be withdrawn at any time, subject to legal and contractual restrictions and reasonable notice. We will obtain consent before making information available to third parties.

**4. We keep personal information accurate and up to date**

We maintain appropriate procedures to ensure that personal information in our possession is accurate and up to date. Members are entitled to seek a correction of personal information if they believe that the information in our possession is not correct.

If a member believes any of the information we have collected about is incorrect or incomplete, they have the right to ask us to change or delete it.

If personal information is inaccurate or incomplete, we will make the necessary changes.

**5. We do not sell personal information**

**6. We will limit how long we keep information**

We will keep personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law.

When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

**7. We safeguard your personal information**

Harmony Hall Centre for Seniors will protect personal information by safeguards that are appropriate to the sensitivity of that information.

Access to personal information is restricted to Harmony Hall Centre for Seniors employees, agents and authorized service providers who need it to do their jobs.

We maintain appropriate technical and organizational safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification.

We have developed security procedures to safeguard and protect personal information against loss, theft, unauthorized disclosure, copying, and unauthorized use of modification. We will maintain appropriate safeguards and security procedures that reflect the types of documents, including electronic or paper records, organizational measures including security clearances and limiting access on a "need to know" basis, and technological measures such as the use of password.

**8. We will be open about our privacy practices**

Harmony Hall Centre for Seniors will make readily available specific information about our policies and practices relating to the management of personal information.

**9. We allow members to access their personal information**

Members may ask whether we hold any personal information about them, ensure that it's accurate, and see that information, as provided by law.

Members also have a right to know:

- How we collected personal information
- How we are using it

**10. Members may register a complaint**

Members may register a privacy-related complaint by contacting Harmony Hall Centre for Seniors' Privacy Officer. We will explain our procedure and provided information about other complaint procedures available. We will investigate all complaints. If an objection is justified, we will take all appropriate steps to repair the situation, including changing our policies and practices if deemed necessary. Complaints should be sent to the Privacy Officer at Harmony Hall Centre for Seniors, 2 Gower Street Toronto, Ontario M4B 1E2 Attention: Privacy Officer or please call (416) 752-0101.

For more information on this policy or procedures, please contact Harmony Hall Centre for Seniors at (416) 752-0101 and ask for the Privacy Officer. You can mail your request Harmony Hall Centre for Seniors, 2 Gower Street Toronto, Ontario M4B 1E2 Attention: Privacy Officer.