2.1-16 Privacy Policy

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		Next Review:	2028

Hospice Palliative Care Ontario (HPCO) is committed to safeguarding personal information. Personal information is managed in accordance with Ontario's *Personal Information Protection and Electronic Documents Act (PIPEDA)* and other applicable laws. This policy outlines the principles and practices HPCO follows in protecting personal information.

Procedures:
HPCO collects only the personal information that is needed for the purposes of providing services, including personal information needed to:

- Deliver requested products and services
- Distribute association membership information and processing applications
- Distribute tax receipts
- Register for educational sessions/conference

HPCO informs individuals in advance, or at the time of collecting personal information, of the purpose for which information is being collected. The only time this notification is not provided is when information is being collected for obvious purposes (for example, producing a credit card to pay a membership or conference fee, when the information will be used only to process the payment).

Consent
HPCO will ask for consent to collect, use or disclose individual personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. HPCO may assume consent in cases where information is volunteered for an obvious purpose.

We assume consent to continue to use, and, where applicable, disclose personal information that HPCO has already collected, for the purpose for which the information was collected.

An individual may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for HPCO to fulfil its legal obligations. HPCO will respect the individual's decision, but may not be able to provide the individual with certain products and services if the necessary personal information is not provided.

Website Privacy Policy
HPCO only collects personal information when you give it to us voluntarily, for example, by filling out a form or survey. We may gather information about traffic on our web site so that we can continue to develop the site to better suit your needs. This does not include personal information about you, but includes information about your visit on the site such as:

- The name of your Internet service provider, its IP address and the name of your service provider's service.
- The length of each visit.
- The number of requests per visit.
- Your type of operating system (Windows, MacIntosh, Unix, etc.)
- Your browser type (Firefox, Internet Explorer, etc.)

Canadians are protected by two federal privacy laws, the *Privacy Act* and the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

Personal Employee Information

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances include a social insurance number, a performance review, etc.

HPCO can collect, use and disclose personal employee/volunteer information without consent only for the purposes of establishing, managing or ending the employment or volunteer relationships. HPCO will provide current employees and volunteers with prior notice regarding what information is collected, used or disclosed and HPCO's purpose for doing so.

HPCO collects, uses and discloses personal employee information for the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues, if they arise
- Administering pay and benefits
- Informing a specified contact in the event of an emergency
- Processing employee work-related claims (e.g., benefits)
- Complying with applicable laws (e.g., Canada Income Tax Act, Ontario Employment Standards Code)

HPCO only collects, uses and discloses the amount and type of personal employee/volunteer information that is reasonable to meet the above purposes. The following is a list of personal employee/volunteer information that HPCO may collect, use and disclose to meet those purposes:

- Contact information such as name, home address, telephone number
- Employment or volunteer information such as resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, long term disability etc.
- Financial information, such as pay cheque deposit information and tax-related information, including social insurance numbers
- Other personal information required for the purposes of employment or volunteer relationship

HPCO will inform HPCO employees and volunteers of any new purpose for which it is necessary to collect, use, or disclose personal employee information, or HPCO will obtain consent, before or at the time the information is collected.

HPCO protects personal information in a manner appropriate for the sensitivity of the information, HPCO makes every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

HPCO uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records. HPCO retains personal information only if is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Individuals have a right to access their own personal information in a record that is in the custody or under the control of HPCO, 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 HPCO refuses a request in whole or in part, HPCO will provide the reasons for the refusal. In some cases where exceptions to access apply, HPCO may withhold that information and provide the individual with the remainder of the record.

The individual may make a request for access to personal information by writing to Rick Firth, President & CEO designated to ensure compliance with PIPEDA. The individual must provide sufficient information in the request to allow HPCO to identify the information which is being sought.

If you have a question or concern about any collection, use or disclosure of personal information by HPCO, or about a request for access to individual personal information, please contact:

Privacy Officer
Hospice Palliative Care Ontario
2 Carlton Street, Suite 1718
Toronto, ON M5B 1J3
privacy@hpco.ca

If you are not satisfied with the response you receive, you may contact:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, ON M4W 1A8
Phone: 416-326-3333 Toll Free: 1-800-387-0073
Email: info@ipc.on.ca Website: www.ipc.on.ca