

ALBERTA LUNG

Type of Policy: Board – Human Resources

Approval Date:
November 30, 2013
Review Date:
Nov 4, 2021

Name of Policy: Privacy – External - HRP5

Purpose: To define actions taken to ensure the privacy of external information collected.

Policy Statement: Alberta Lung (“AL”) recognizes the importance of privacy and the sensitivity of personal information. AL has been, and continues to be, committed to maintaining the accuracy, confidentiality and security of the personal information it collects. In addition, AL is required to comply with provincial privacy legislation. This Privacy Policy outlines how AL manages and safeguards your personal information and the circumstances under which that information may be disclosed to someone else.

Definitions: *Personal information* Means any information that identifies a particular individual, other than business contact information such as the person’s business telephone number or business address.

Guidelines: This Privacy Policy applies to the collection, use and disclosure of personal information about anyone other than AL’s employees.

Procedures: Privacy Principles
In accordance with Alberta’s privacy legislation, AL has established the following privacy principles.

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Accountability

AL is responsible for maintaining and protecting personal information under its control. Each employee of AL is responsible for the personal information under his or her control. Our employees are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy.

AL is responsible for maintaining and protecting the personal information that is under its control. The AL Board of Directors will select and appoint the appropriate person to act as Privacy Officer for the AL.

Collection of Personal Information by AL

The personal information about you that may be collected by AL includes:

- Mailing address
- Email address
- Telephone number
- Date of birth
- Financial Information, e.g. bank account number

Most of the information we collect about you comes to us directly from you. In some cases, however, information about you comes to AL from third parties such as rental mailing lists used in fundraising campaigns.

The circumstances under which AL can use or disclose your personal information are discussed below.

Purposes for Which AL Collects and Uses Personal Information

The primary purpose for which AL collects and uses personal information about you is fundraising to support AL's programs. AL also collects and uses personal information for the following purposes:

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- for keeping you informed about the services AL offers and of developments in lung health that may be of interest to you;
- for responding to an inquiry received from you, including an inquiry received by e-mail; and
- for general management and reporting purposes, such as issuing receipts for charitable donations.

Disclosure of Personal Information

AL may be required or permitted to disclose personal information to people outside AL. Examples of these circumstances include:

- disclosure to a federal or provincial government department or agency, such as the Canada Revenue Agency;
- disclosure ordered by a court or permitted by the normal court process; and
- disclosure to the AL's auditors or other professional advisors.

If AL has collected personal information about you solely as a result of your visiting AL Web site or of your making an inquiry to AL by telephone, letter or e-mail, AL will not disclose that information to anyone without your consent unless the disclosure occurs as part of a court process or AL is required by law to disclose the information.

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Your Access to Your Information

It is important to ensure the accuracy of any personal information AL has about you. Generally speaking, you are entitled to know what personal information AL has about you, and to change that information if it is inaccurate or out-of-date. If you want access to the information AL has about you, you should send a written request to AL's Privacy Officer. AL will respond to the request within a reasonable time. (Please note that you will be required to provide satisfactory identification before you receive the information.)

In some circumstances, AL may not be able to provide access to all of the personal information it has about you. This could occur when:

- providing access would be likely to reveal personal information about a third party or could pose a threat to the security of the third party, and the information cannot be segregated;
- disclosure would reveal confidential commercial information of AL;
- the information has been collected during the investigation of a legal matter or cannot be disclosed for other legal reasons, such as a non-disclosure agreement;
- where government authorities have properly instructed AL not to disclose such information; and other exceptions authorized by legislation.

If AL refuses your request for access to your personal information, AL will tell you the reason for the refusal, and you will be entitled to challenge the refusal.

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Other Peoples' Access to Your Information

The circumstances under which people outside AL might gain access to your personal information through deliberate disclosure by AL are described earlier in this Privacy Policy. This discussion relates to other kinds of possible access to your personal information.

Your personal information is protected by security safeguards that are appropriate to the sensitivity level of the information. AL makes every reasonable effort to protect personal information against loss or theft, as well as unauthorized access, disclosure or modification. The precautions taken by AL include:

- Access to personal information by AL staff is restricted to those staff members who require access in the performance of their duties.
- AL computer systems are password-secured and constructed in such a way that only authorized individuals can access our systems and databases.
- AL computer server is protected by firewall and access controls. The stability of the systems is assured by a UPS (uninterruptible power supply) and hardware redundancy features built into the servers. Industry-standard virus software is installed on the network and all desktop computers.
- Nightly backups are performed on all systems, with backup tapes being stored securely for disaster recovery purposes.

If you send us an e-mail message that includes personal information (such as your name included in the "address"), we will use that information to respond to your inquiry. Data transmitted within AL on its private network (or Intranet) is not encrypted, nor are e-mail communications leaving the AL network. You should be aware that communication via the Internet is not secure.

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Retention

AL retains information only as long as it remains relevant or necessary for the identified purposes, or as required by law.

Complaints and Suggestions

You may direct any questions or complaints with respect to the privacy principles outlined above or about AL's privacy practices to AL's Privacy Officer. You can reach the Privacy Officer by telephone at 1-888-566-5864 by fax at (780) 488-7195, or by mail to:

Privacy Officer
Alberta Lung
PO Box 4500, Station South
Edmonton, AB T6E 6K2

AL will promptly investigate all complaints concerning compliance with this Privacy Policy. If you make a complaint concerning compliance with this Privacy Policy, and the issue cannot be resolved by discussions between you and AL's Privacy Officer, the complaint will be investigated promptly, and you will be told the outcome of the investigation. If you still feel that your concerns have not been addressed satisfactorily, AL will give you information on other complaint procedures that may be available to you, such as making a complaint to Alberta's Information and Privacy Commissioner.

Updating this Policy

AL reserves the right to add, modify or remove portions of this Privacy Policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of the page.