



# SMGH Foundation

Strathroy Middlesex General Hospital Foundation

## PRIVACY POLICY

Reference No.	SMGH/PP/2023
Previous Version	-
Version	Version 2.01
Prepared By	Arvind Kumar
Recommended By	Governance Committee
Approved By	Board of Directors
Recommended on	August 25, 2023
Approved on	September 6, 2023
Last reviewed	-
Next Review	September 2026



## Table of Contents

1.	INTRODUCTION .....	3
2.	PERSONAL INFORMATION AND ITS COLLECTION .....	3
2.1.	Non-Personal Information: .....	3
2.2.	Cookies and similar technologies .....	4
2.3.	Server log files .....	4
2.4.	Google analytics.....	4
2.5.	Consent.....	4
3.	USE OF COLLECTED INFORMATION .....	5
4.	HOW WE PROTECT PERSONAL INFORMATION COLLECTED .....	5
5.	POLICY AMENDMENTS.....	5
6.	INQUIRIES .....	6



### 1. Introduction

The Strathroy Middlesex General Hospital Foundation ("SMGH Foundation") is dedicated to protecting the privacy of the contact information and other sensitive data of its directors, officials, employees, volunteers, members, customers, donors, and other stakeholders. We place a great priority on retaining the trust of our community partners, donors and the general public, and we recognise that doing so requires us to be transparent and accountable in managing the information shared with SMGH Foundation.

The SMGH Foundation frequently collects and uses the personal information of persons in the course of our numerous projects and activities. Anyone from whom we gather such information has the right to assume that it will be strictly protected and that their consent will be requested for any use or other transactions with it in any capacity. The SMGH Foundation's established privacy rules are oriented towards achieving this objective.

### 2. Personal Information and Its Collection

The term "personal information" refers to any information that can be used to distinguish, identify, or contact an individual. This data may include an individual's opinions or beliefs, as well as facts about or relating to the individual. Business contact information and certain publicly available information, such as names, addresses, and telephone numbers published in telephone directories, are not considered personal information.

SMGH Foundation may collect the following types of personal information:

- Information that you provide when using the website's services. In order to access certain services on the website, you may be needed to provide personal information such as your name, address, telephone number, and email address.
- When requesting a service, we collect your credit card, debit card, and bank account information (such as an online pledge or monthly donations).
- Your customer service communication and general feedback supply us with information.

This policy does not apply to information in the public domain and non-personal information because it is not subject to privacy regulations.

SMGH Foundation considers the information to be business contact information, which is not protected as personal information, when customers, clients, or other individuals provide their residential contact information as business contact information. However, SMGH Foundation always consider donor and volunteer information to be personal information, and we never disclose donor or volunteer information without consent.

#### 2.1. Non-Personal Information:

SMGH Foundation may collect non-personal information when you visit our website, such as a list of the pages you visited. In general, the website collects non-personal information from the following sources: server log files, cookies, and other technologies, as well as information that you voluntarily provide.



### 2.2. Cookies and similar technologies

- The websites of the SMGH Foundation use persistent cookies within the browsers of visitors to enable site functionality and track site performance. Cookies are utilised in the following ways:
- Preserving and expiring site visitor sessions (e.g. preserving data between steps of a process; and ending the session after a period of inactivity)
- Preferences for font size are stored on the site.
- Enabling web analytics tools (such as Google Analytics etc.)

Cookies are used without storing Personal Information and in an anonymous manner. To decline or selectively decline cookies, visitors who wish to opt out of receiving cookies should consult the browser's documentation. Note that disabling cookies could negatively affect site performance.

### 2.3. Server log files

The Internet Protocol (IP) addresses are unique numbers assigned by Internet Service Providers (ISP) to all devices used to access the Internet. Web servers automatically log the IP addresses of visitors to our website. However, the IP address, on its own, does not identify an individual.

### 2.4. Google analytics

The website of the SMGH Foundation uses [Google Analytics](#) to track performance. Google Analytics use persistent [cookies](#) to monitor visitor sessions, visitors across many sessions, and referring sites. Using Google Analytics, we also track the performance of promotional links to our website. According to the [Google Analytics Terms of Service](#), personal information is never transmitted to Google Analytics. Note that Google Analytics keeps data in the United States and is subject to US law. We use this information to better comprehend the site's performance and serve you. To opt out of Google Analytics data gathering, users must install the [Google Analytics Opt-out Browser Add-on](#).

### 2.5. Consent

When information is acquired, consent is necessary for the collection and intended use of an individual's personal information. Consent can be either explicit or implicit, and it can be given either directly by the individual or by a representation with their permission. consent can be expressed orally, electronically, or in writing. Implied consent is the consent that can be properly inferred from a person's conduct or inaction. Before divulging sensitive information to third parties, the consent of the individual is essential.

We acknowledge your right:

- To know what purpose the information gathered might be used.
- To know with what other entities the information gathered might be shared.
- To a guarantee of reasonable security of any data collected.
- To a guarantee of data accuracy and fidelity.
- To access to data gathered to ensure accuracy and fidelity.
- To choose not to be included in any use of the data unrelated to the stated purpose for which the data



was collected.

- To choose not to be included in any transfer of data to any third party for any use unrelated to the stated purpose for which the data was collected.

### **3. Use of Collected Information**

- a. The information obtained from you will be used to offer the desired services. The collecting of personal information is restricted to what is pertinent and required for our activities and fundraising efforts.
- b. SMGH Foundation does not sell, rent, trade, or otherwise disclose your personal information to other parties except to partner with other businesses to fulfil our services. We may share your personal information with third parties who perform services on our behalf in order to fulfil your requests. For instance, if you make a donation through credit card, certain personal information may be shared with our bank partner in order to process the credit card transaction. Personal information may be revealed to service provider maintaining the accounting of donations. As needed by law, additional disclosures may be made to other parties.
- c. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### **4. How We Protect Personal Information Collected**

We limit access to personal information to personnel and contractors of SMGH Foundation that need to know it in order to operate, develop, or upgrade our services. These individuals are bound by confidentiality duties and may face disciplinary action, including termination and criminal prosecution, if they breach these responsibilities.

SMGH Foundation shall maintain the confidentiality of all personal data collected. Physical and electronic safeguards are implemented to maintain the security of personal information. Access to donor and volunteer records shall be restricted to those who require such data to perform their duties. All records linked to anonymous donors must be afforded heightened security. Donor and volunteer records shall remain confidential after the contact with the individual has terminated.

When we share your information with business partners in order to fulfil your request and provide you required services, we ensure that these parties agree to do so in accordance with our instructions and with the necessary level of confidentiality and security.

The TLS protocol is used to encrypt and secure users' personal information when they submit it to our website.

### **5. Policy Amendments**

We reserve the right to update this Privacy Policy at any time. Your rights under this Privacy Policy will not be diminished without your permission. Any updates to our Privacy Policy will be made available on this page, with



a more prominent announcement made if the update is substantial.

### 6. Inquiries

Questions, comments, or complaints about this Privacy Policy or SMGH Foundation's treatment of personal information can be directed by sending an email at [info@smghfoundation.com](mailto:info@smghfoundation.com). Your inquiry will be handled in confidence and will not be shared with anyone outside of SMGH Foundation, its service suppliers, and any boards responsible for governing or supervising the organization.

More information on privacy and your rights in relation to your personal information can be found on the privacy Commissioner of Canada's website, [www.priv.gc.ca](http://www.priv.gc.ca).