



## **GIST Sarcoma Life Raft Group Canada Privacy Policy**

**July 2013**

### **Our Commitment to Privacy**

GIST Sarcoma Life Raft Group, Canada (LRG) is committed to protecting the privacy of its members, donors, employees, and other stakeholders. LRG values the trust placed in the organization and recognizes that maintaining this trust requires that LRG be transparent and accountable in how information that has been given to LRG is treated. This privacy policy statement outlines the principles and practices that LRG applies in order to ensure the confidentiality and integrity of your personal information.

### **Definitions**

Personal information – is information that is recorded in any form, both fact and opinion, and that can be used to distinguish, identify, or contact a specific individual. For the purposes of this policy, personal information means information about an identifiable individual as defined by applicable privacy legislation in Canada. Generally speaking it does not include business contact information and certain publicly available information, such as names, addresses, email addresses, facsimile numbers and telephone numbers as published in telephone directories.

### **Principles and Practices**

#### **Accountability:**

LRG is responsible for the personal information under our control. While the Board of Directors of GIST Sarcoma Life Raft Group, Canada, as a whole, is ultimately accountable for the protection of personal information, a designated Privacy Officer is responsible for monitoring practices and procedures to ensure compliance with the principles set out in this policy. LRG is responsible for personal information in our possession or custody, including information that has been transferred to a third party for processing. LRG will use contractual or other means to provide a comparable level of protection when a third party is processing information.

#### **Purpose:**

LRG identifies and documents the purpose for which personal information is collected used or disclosed at or before the time of collections.

The purposes will be limited to those which are related to LRG business (mission and value statement of LRG) and which a reasonable person would consider appropriate in the circumstances. LRG collects, uses and discloses personal information concerning our members, donors for the following reasons:

- To solicit and process donations and to issue tax receipts;
- To process applications to other organizations for funding (e.g. financial assistance, grants, bursaries, subsidies) for LRG;
- To process and approve membership applications;
- To provide requested information (e.g. brochures, newsletters, etc.);
- To establish relationship and communicate with LRG donors;
- To understand LRG donors and how LRG may improve services to meet their preferences and expectations;
- To meet requirements imposed by law;
- To compile profiles on directors and members of committees;
- For any other purposes to which consent if given;

If LRG plans to use personal information collected for a purpose not previously identified, LRG will identify and document this before such use.

LRG will make every reasonable effort to specifically identify purposes, orally or in writing, to the individual from whom the personal information is collected either at the time of collection or after collection but before use. LRG will state the identified purpose so that an individual can reasonably understand how the information will be used or disclosed.

**Consent:**

Personal information will only be collected, used or disclosed with the knowledge and consent of the individual, or as required by law.

The way, in which LRG seeks consent, including whether it is expressed or implied, may vary depending upon the sensitivity of the information and the reasonable expectations of the individual. An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. LRG will inform individuals of any implications of withdrawing consent.

Typically, LRG will seek consent for the use or disclosure at the time of collection. In certain circumstances, consent may be sought after information has been collected but before use (such as where LRG wants to use information for a purpose not previously identified).

**Limiting Collection:**

LRG will limit the amount and type of personal information collected to that which is necessary for the identified purpose and LRG will only collect personal information by fair and lawful means.

**Limiting Use, Disclosure and Retention:**

Personal information will 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 will be retained as long as necessary to fulfill the indentured purposes.

Personal information which has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law. Where personal information is no longer required to fulfill the identified purpose, it will be destroyed, erased or made anonymous.

LRG does not transfer your personal information to a third party for marketing purposes unless your written consent is given. Any personally identifiable data about LRG members, donors or employees or web site visitors is stored securely.

**Accuracy:**

LRG will use their best efforts to ensure that personal information, including information that is disclosed to third parties, is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

**Safeguards:**

LRG will protect personal information with safeguards appropriate to the sensitivity of the information. LRG safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. LRG will make its employees and volunteers aware of the importance of maintaining the confidentiality of the personal information and LRG will exercise care in the disposal or destruction of the personal information to prevent unauthorized parties from gaining access to the information.

LRG methods of protection will include physical measures (for example, locked filing cabinets, restricted access to offices), organizational measures (for example, limiting access on "need to know" basis), and technological measures (for example, the use of passwords and encryption).

**Openness Concerning Policies and Practices:**

LRG will make readily available to members, donors, employees and stakeholders specific information about our policies and practices relating to the management of personal information.

The information that LRG will make available will include: how to gain access to personal information; the type of personal information held by us, including a general account of its use; general information concerning LRG policies: what personal information is made available to funders, and how to contact the LRG Privacy Officer.

**Individual Access:**

Upon written request, LRG will inform an individual of the existence, use and disclosure of his or her personal information and LRG will give the individual access to that personal information. And individual can challenge the accuracy and the completeness of his or her personal information and have it amended as appropriate.

LRG will respond to an individual's written request with in a reasonable time (generally within 30 days). LRG will assist any individual, if they need assistance, in preparing a request. LRG may require an individual to provide sufficient information to permit LRG to provide an account of the existence, use and disclosure of personal information.

While the response of LRG will typically be provided at no cost, depending on the nature of the request and the amount of information involved, LRG reserves the right to impose a cost. In these circumstances, LRG will inform the individual of the approximate cost to provide the response and request direction from the individual on whether or not to proceed with the request. Requested information will be provided or made available in a form that is generally understandable. Where possible, LRG will indicate the source of the information.

In providing an account of the parties to which LRG may have disclosed personal information about an individual, LRG will attempt to be as specific as possible.

If an individual successfully demonstrates the inaccuracy or incompleteness of personal information, LRG will amend the information as requires. If challenge is not resolved to the satisfaction of the individual, LRG will record the substance of the unresolved challenge. Where appropriate the amended information or the existence of the unresolved challenge, as the case may be, will be transmitted to the third parties having access to the information in question.

In certain situations, LRG may refuse a request or not be able to provide access to all the personal information LRG holds about an individual. Exceptions to the access requirement will be limited and specific, as permitted or required by law. Where permitted, the reasons for denying access will be provided to the individual upon request.

**Recourse:**

Any individual can address a challenge concerning LRG compliance with any of the Privacy Principles to the LRG Privacy Officer.

LRG will investigate all written complaints. If a complaint is found justified, LRG will take all appropriate measures, including, if necessary, amending our policies and practices.

**Website Privacy:**

LRG's website operating system may automatically record some general information about your visit such as:

- The Internet domain for your Internet service provider, such as 'company.com' or 'service.ca' and the IP address of the computer accessing the website such as 'pp-55'

- The type of browser (such 'Firefox version x' or Internet Explorer version x") you are using.
- The type of operating system you are using (such as Macintosh or Windows)
- The date and time you visited the LRG website and the web pages you visited the site, along with the address of the prior web site you were visiting if you linked to the LRG website from another website.

You will not receive marketing email from LRG unless you have consented to receive it. LRG uses email to communicate to our members, donors and stakeholders. However, LRG does not send 'spam' (unsolicited marketing email). If you agree to receive email communication from LRG every email message LRG sends will include an email address to which you can respond. If you do not wish to receive email from LRG please contact our administrator at [info@liferaftgroup.ca](mailto:info@liferaftgroup.ca).

LRG adheres to all privacy legislation as set out in Canada's Personal Information Protection and Electronics Act (PIPEDA), British Columbia's Personal Information Protection Act (PIPA), Alberta's Personal Information Protection Act (PIPA), Ontario's Personal Health Information Protection Act (PHIPA) and Quebec's An Act Respecting the Protection of Personal Information in the Private Sector.

LRG reserves the right to modify or supplement this privacy policy at any time.

Requests for further information, complaints, access or questions should be in writing to:

Privacy Officer  
GIST Sarcoma Life Raft Group Canada  
P.O. Box 64737  
810 - 3025 Lougheed Hwy  
Coquitlam, BC V3B 6S2

[privacyofficer@liferaftgroup.ca](mailto:privacyofficer@liferaftgroup.ca)

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