

 ST. JOSEPH'S VILLA FOUNDATION	POLICY	SECTION ADMIN	PAGES 1 OF 6	NUMBER BUS-ADM #13
Subject: Privacy of Information			Date October 23, 2025	
Supersedes January 20, 2020	Cross Reference		Issuing Authority PRESIDENT & CEO	

POLICY STATEMENT:

St. Joseph's Villa Foundation, Dundas (SJVF) is committed to protecting the privacy of the personal information of its donors, volunteers, employees, and other stakeholders. We value the trust of our supporters and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us.

During the course of our various projects and activities, we frequently gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. Our privacy practices are designed to achieve this.

We uphold the principles of the Donor Bill of Rights. Our privacy policy adheres to the Personal Information Protection and Electronic Documents Act (PIPEDA).

DEFINING PERSONAL INFORMATION:

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

PRIVACY PRACTICES:

Accountability

The SJVF's Chief Privacy Officer (CPO) is the President & CEO. The CPO works closely with the CPO of St. Joseph's Villa, Dundas (Villa), to ensure the consistent application of privacy legislation, policies and procedures and in accordance with the principles and policies of the Imagine Canada Ethical Fundraising Standards to promote and protect the privacy of all benefactors of SJVF.

The CPO's responsibility is to understand the broad impact of privacy, to implement policies and procedures, and to handle complaints. He/she will communicate and explain this policy and give training regarding it to all employees and volunteers, who might be in a position to collect, retain or use personal information.

Third Party Use of Personal Information

SJVF uses third party vendors for services that would not be practical or cost-effective for us to perform ourselves. In all cases, the third party vendor signs a confidentiality agreement promising that it will take every precaution to protect the personal information in its possession and to destroy it upon completion. (Appendix A)

Further, data sent between SJVF and third party vendors will be encrypted to ensure protection.

SJVF uses third parties to process mailings. This requires sending name, address, and sometimes last gift information, usually segmented into specific categories based on gift recency and frequency. The mailing house addresses, sorts, and co-ordinates the distribution of these mails.

DATABASE ANALYSIS

SJVF may, on occasion, employ a third party to analyze our database to help us improve our fundraising practices. Only information necessary to the analysis is released.

IDENTIFYING PURPOSE

Before personal information is collected, SJVF must identify the purpose for which it is being collected. (Appendix B) Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered unless otherwise required by law. Should a new purpose be established, individuals must be notified of the change.

CONSENT

(a) Implied Consent

In the collection, use or disclosure of personal information, knowledge and consent of the individual is required. This consent must be meaningful and easily understood. The SJVF will consider a donation as implied consent to inform the donor of the impact of their gifts and include them in future communications to support SJVF, unless otherwise indicated by the donor.

(b) Withdrawal of Consent

SJVF offers individuals the opportunity not to receive any or all communications from us. Such requests will be respected and acted on promptly. Opt-out clauses will be included in all direct mail pieces, e-newsletters, and e-solicitations. Opt-out contact information is prominently located on the SJVF website: www.sjvfoundation.ca. To opt-out at any time, donors are invited to call SJVF at 905-627-9011.

(c) Resident Family Solicitation (includes Outreach Program Clients & St. Joseph's Estates

SJVF receives limited information on family members of residents who have been admitted to the Villa. Safeguards have been put in place to protect resident and family member privacy and to eliminate inappropriate mailings. Only if an individual initiates contact with SJVF and consents to receiving information and/or communications materials, does SJVF know of their name and address. Donating is considered to imply consent. SJVF materials include an "opt-out" or unsubscribe clause. Requests to be excluded from mailings or other communications will be respected and acted on promptly. The process to opt-out or unsubscribe from mailings is readily available on our website, included in our direct mailings and other communication materials.

(d) Publication of Donor Lists

With respect to the publication of donor lists by gift category, donor consent will be obtained at the time of solicitation and donor requests for anonymity will be honoured.

(e) Limiting Collection

Personal information collected is limited to that which is necessary to fulfill the purposes identified.

Information will be collected only by lawful means without misleading or deceiving individuals as to the reason. The source of the data will be indicated on each file.

(f) Limiting Use, Disclosure and Retention

SJVF collects, uses and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. When information is no longer needed, it will be destroyed.

SJVF only uses the information it collects for SJVF programs that support the Villa.

SJVF does not lend, exchange, rent or sell our donor list to other organizations or individuals.

(g) Accuracy

SJVF will ensure that personal information is as accurate, complete, and up to date as possible.

(h) Openness

SJVF provides the public with general information on our personal protection policies and practices, and makes it clear who serves as the SJVF's Chief Privacy Officer. This information is posted on our website and published on a regular basis in our various communications.

(i) Safeguards

SJVF will ensure that steps are taken to protect personal information from theft and loss, as well as unauthorized access, disclosure, copying or use.

Hard copies of records are kept in locked cabinets and are accessible by SJVF staff only on a need to know basis. Only SJVF staff with confidential passwords may access electronic records.

Information obtained from donors or visitors to our website is protected by special electronic security measures. SJVF only captures information from our website if a visitor chooses to make a donation, fill out a form or contact us.

(j) Individual Access

Upon request, individuals will be informed of the existence, use and disclosure of all of their personal information and be given access to that information. An individual has the right to challenge the accuracy and completeness of the information and have it amended if appropriate. An exception to this would be if information could not be disclosed for legal, security or other reasons.

If the information requested contains personal information about another individual, the other individual's information must be removed before the request is honoured.

All requests for access will be responded to within a reasonable time (no more than 30 days) and at minimal or no cost to the individual.

(k) Challenging Compliance

An individual can challenge SJVF's compliance with this policy. If so, SJVF will follow the procedures as outlined in its Complaints Policy (**BUS-ADM-6**).

Policies and procedures will be amended if a complaint has validity.

Updating of Privacy Policy

This policy will be regularly reviewed and updated as required. Revisions will be posted on the SJVF website.

Contact Information

Questions, concerns or complaints relating to SJVF's privacy policy on the treatment of personal information should be emailed to: d_davidson@sjv.on.ca

56 Governor's Rd., Dundas, ON L9H 5G7

905-627-9011 ext. 2293

Further information on privacy and personal information may be found on the website of the Privacy Commissioner of Canada at www.privcom.gc.ca.

An Agreement**between****Sarina Isenberg****and**

St. Joseph's Villa Foundation, Dundas (SJVF)
56 Governor's Rd.
Dundas, ON L9H 5G7

In order to protect the privacy of the individuals who comprise the database of SJVF, (name of company) agrees to hold such information in the strictest confidence. Its staff will limit access to this information, which will be destroyed/deleted upon receiving instructions from the SJVF. It will be used in accordance with the instructions provided by the SJVF and for no other purposes whatsoever.

(Name of company) agrees not to share this information with any other person or organization, except with the prior written approval of the SJVF. It will not be retained for any other purpose. It will not be duplicated, reproduced or stored, electronically or otherwise, in whole or in part, without the prior consent of the SJVF.

(Name of company) is responsible for the implementation of security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

(Name of company) agrees that the SJVF has at all times the right to demand immediate return of the information and any and all copies, excerpts, duplications in any form in the possession of (Name of company), their employees or agents, and that following such demand, the same shall be returned to the SJVF and all access to the information will be terminated.

 Don Davidson, President & C.E.O.
 St. Joseph's Villa Foundation

Date _____



Sarina Isenberg _____
 (Name of Principal & Company)

Date __January 6, 2022_____

Appendix B

Sample Purpose Statement (s)

Your Privacy is very important to us:

St. Joseph's Villa Foundation contacts its friends periodically to share news and information about St. Joseph's Villa by mail, phone or email. If you have any questions about this process, please call us at 905-627-9011 so that we can note and adhere to your personal privacy preference.

- ☐ ***Please exclude me from your mailing list***
- ☐ ***This gift has been made anonymously***
- ☐ ***Please exclude my name from lists celebrating donors by gift level.***

"It is our policy not to share, sell, or rent our mailing list with any person or organization. However, from time to time, we share news and information about the Villa and Foundation by mail and by email. This may include our annual report, e-newsletters, and letters concerning Villa and Hospice needs and progress. If you do not wish to receive this information, please check the box below."