

**Type of Policy:** Board – Human Resources

**Approval Date:**  
November 30, 2013  
**Review Date:**  
July 31, 2016

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**Name of Policy:** Privacy – External - HRP5

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

**Policy Statement:** The Lung Association - Alberta & NWT (“TLA”) recognizes the importance of privacy and the sensitivity of personal information. TLA has been, and continues to be, committed to maintaining the accuracy, confidentiality and security of the personal information it collects. In addition, TLA is required to comply with provincial privacy legislation. This Privacy Policy outlines how TLA 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 TLA’s employees.

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

## **Accountability**

TLA is responsible for maintaining and protecting personal information under its control. Each employee of TLA 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.

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

## **Collection of Personal Information by TLA**

The personal information about you that may be collected by TLA 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 TLA from third parties such as rental mailing lists used in fundraising campaigns.

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

## **Purposes for Which TLA Collects and Uses Personal Information**

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

- for keeping you informed about the services TLA 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**

TLA may be required or permitted to disclose personal information to people outside TLA. 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 TLA's auditors or other professional advisors.

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

## **Your Access to Your Information**

It is important to ensure the accuracy of any personal information TLA has about you. Generally speaking, you are entitled to know what personal information TLA has about you, and to change that information if it is inaccurate or out-of-date. If you want access to the information TLA has about you, you should send a written request to TLA's Privacy Officer. TLA 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, TLA 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 TLA;
- 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 TLA not to disclose such information; and other exceptions authorized by legislation.

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

### **Other Peoples' Access to Your Information**

The circumstances under which people outside TLA might gain access to your personal information through deliberate disclosure by TLA 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. TLA makes every reasonable effort to protect personal information against loss or theft, as well as unauthorized access, disclosure or modification. The precautions taken by TLA include:

- Access to personal information by TLA staff is restricted to those staff members who require access in the performance of their duties.
- TLA computer systems are password-secured and constructed in such a way that only authorized individuals can access our systems and databases.
- TLA 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 TLA on its private network (or Intranet) is not encrypted, nor are e-mail communications leaving the TLA network. You should be aware that communication via the Internet is not secure.

### **Retention**

TLA 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 TLA's privacy practices to TLA'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**  
The Lung Association – Alberta & NWT  
PO Box 4500, Station South  
Edmonton, AB T6E 6K2

TLA 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 TLA'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, TLA 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**

TLA 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.