



**Courage. Encouraged.**

## **PRIVACY CODE**

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The Glenrose Rehabilitation Hospital Foundation (GRHF) Privacy Code is a formal statement of the principles and guidelines concerning the requirements for the protection of personal information provided to GRHF by its stakeholders, donors and employees. GRHF strives to provide the best service possible. This means handling your personal information fairly and honestly.

The purpose of the GRHF Privacy Code is to provide responsible and transparent practices in its management of personal information in keeping with applicable legislation. It tells you how we protect your privacy and the confidentiality of your personal information.

### **What is Personal Information?**

Personal Information is any piece of information, either factual or subjective, about an identifiable individual. Personal Information does not include the name, title, business address or telephone number of an employee of an organization.

### **The 10 Principles of Privacy**

The following principles, developed by the Canadian Standards Association, form the basis of GRHF's fair information practices and outline GRHF's commitment to protecting your privacy.

#### **1. Accountability**

Every GRHF employee is responsible for maintaining the confidentiality of all information to which they have access. Our employees are informed about the importance of privacy and receive ongoing updates on privacy related policies.

#### **2. Identifying Purposes: Why we collect information**

Should we need to collect personal information from you, we will identify the purpose for the collection at or before the time we collect it. We will only collect the information needed to fulfill the purpose we have identified and for no other purpose. If we wish to use your information for any other purpose we will obtain your consent.

We ask for your personal information in order to meet your service and product needs, as well as to establish a lasting relationship with you. For example, we may request your personal information to:

- send you information that you have requested
- invite you to events
- better understand your needs
- provide you with information our initiatives
- comply with law.

#### **3. Consent**

GRHF seeks your consent to collect, use or disclose your personal information at the time of collection or in advance. We have taken steps to ensure that our language is clear and understandable so that you know why we are collecting your information and how we will use it. Please note that under certain legal and medical circumstances it may be impossible or impractical to obtain an individual's consent.

Consent may be expressed in writing or it may be implied in the circumstances. In addition to writing, your consent may also be expressed verbally or electronically. In deciding what form of consent is appropriate, we will consider the type of personal information we need, its use, any necessary disclosures, the type of customer contact that is involved and applicable legislation. In general, you can choose not to provide us with some or all of your personal information at any time. Upon request we will explain your options of refusing or withdrawing consent to the collection, use, and disclosure of your personal information.



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#### 4. Limiting Collection

GRHF does not collect personal information indiscriminately. Rather, we limit our collection of personal information to only what is necessary for the purpose we have identified. We employ fair and lawful means in the collection of personal information.

#### 5. Limiting Use, Disclosure and Retention

GRHF will use or disclose your personal information for the purpose for which it was collected, except with the consent of the individual.

There are some instances in which we may be required to disclose your personal information as part of GRHF conducting its business in the ordinary course; this includes, for example, suppliers and distributors. When we hire other organizations to provide support services, we will require them to conform to our privacy standards.

We will retain personal information only for as long as required to fulfill the identified purpose. Once your personal information is no longer required, it will be destroyed or made anonymous.

#### 6. Accuracy

At GRHF, we endeavour to keep our personal information holdings complete, up-to-date and accurate. While we do our best to ensure our information is accurate, we do rely on individuals to inform us of any relevant changes in their personal information.

Should you discover, upon review of your personal information, that amendments are required, please advise us. If the requested change is accepted, the personal information will be modified in accordance with your request as soon as possible and you will receive a copy of the amended portion of the record.

When a correction or amendment has been made to a personal record, GRHF will, where appropriate, send a copy of the correction to any persons or organizations that have access to the information in question.

If the requested change is not accepted, you will be notified in writing that the change will not be made. You will be given an opportunity to submit a statement concerning the dispute which will be maintained along with the disputed information for as long as we retain that information. Where appropriate, third parties who have received the disputed information will also receive a copy of the statement of dispute.

#### 7. Safeguards: Protecting your information

We employ appropriate safeguards to make certain that your personal information is protected from loss or theft as well as from unauthorized access or disclosure.

The information we collect is retained on GRHF premises, other than where you have consented to its release or such release is required by law. GRHF may employ other companies to provide services to you on our behalf, such as data processing or records retention. When this occurs, we have contracts in place to ensure your personal information is protected by the same high standards that govern GRHF's information handling practices.

The nature of the safeguards and level of protection will depend on the sensitivity of the information in question and incorporates physical security measures (locked doors and file cabinets), organizational controls (visitor sign in and employee identification cards), and technological tools (computer passwords and encryption).

GRHF audits its security measures to ensure our practices conform with our Code and related privacy policies.



## 8. Openness: Keeping you informed

We have prepared this Privacy Code to keep you informed of our commitment to protecting your personal information. It is available to the public in paper form at the address set out below and in electronic form at [infor](#).

If you have any privacy related questions or concerns not addressed in the Privacy Code, please contact our Chief Privacy Officer at 1-800-265-1840 extension 2 or by mail at 1840 Oxford St. E., London, Ontario N5V 3R6. We will respond to all inquiries to the best of our ability.

## 9. Providing Access

GRHF Canada will provide you with access to the information it retains about you upon receipt of a written request and satisfactory identification.

We may charge you a nominal fee and if so, we will give you notice in advance of costs for processing your request.

Upon written request and satisfactory identification, we will also correct or amend any personal information if its accuracy and completeness is found to be deficient.

There are some instances where GRHF will not be able to provide an individual with the requested information. Some of these instances include where the information:

- consists of references to other persons that cannot be otherwise severed,
- is subject to solicitor–client privilege,
- contains confidential GRHF proprietary information,
- has already been destroyed due to legal requirements or because it was no longer needed for the identified purpose.

If GRHF is unable to provide you with the information you have requested, the reason for the refusal will be explained in writing.

## 10. Providing Recourse

You may at any time initiate a formal privacy inquiry by contacting any of the above personnel. Once your written request form is received, GRHF will promptly initiate an investigation and respond to your concern in writing.

If the issue is still not satisfactorily resolved, we will provide information on other complaint procedures that may be available to you.

If you have any questions or concerns about the privacy of your personal information or our Privacy Code, please contact us at 780.735.6124 or by mail at Glenrose Rehabilitation Hospital Foundation 10230 111 Avenue NW, Edmonton, AB T5G 0B7.