

CONFIDENTIALITY POLICY

This Policy applies to Queen Elizabeth Health Complex Foundation, ("we", "us" or "our") and sets out the principles by which Queen Elizabeth Health Complex Foundation handles privacy matters.

1. General

1.1 Objective

The Queen Elizabeth Health Complex Foundation is an organization whose mission is to raise funds to support the Queen Elizabeth Health Complex. We collect, use, and disclose information daily for the purposes of our services relating to soliciting contributions of various forms and participating in events. Confidentiality of information is important to us. We adhere to the highest ethical standards when handling all information, particularly personal information.

This Confidentiality Policy is intended to help you understand our practices regarding the collection, use, disclosure, and retention of personal information. By providing us with personal information (through our website, by completing an event entry or donation form, online, by email, in person or by telephone), you agree to it being processed in accordance with what is set out in this Confidentiality Policy, and you authorize the Queen Elizabeth Health Complex Foundation, its third parties and its service providers to process your personal information for the purposes set out below (see point 4).

This Confidentiality Policy does not apply to third-party websites which may be accessed by clicking on links on this website, and the Queen Elizabeth Health Complex Foundation is not responsible for such third-party websites. This is the case, for example, when you make a donation. In such a case, you will be redirected to a transactional site, since the Foundation does not collect or store information relating to credit card numbers. If you follow a link to a third-party website, that third party will have its own confidentiality policies which you should review before submitting any personal information.

2. What information do we collect?

Personal information means any information about an individual from which that person can be identified. They do not include data from which the identity has been removed, i.e., anonymous data. We may collect, use, store and transfer different types of personal information about you during our business and provision of services, including:

- professional and/or personal contact details, such as first name, last name, address(es), email address(es), date of birth and telephone number(s).
- biographical information such as job title, employer name, professional and/or personal background, photos and video or audio content.
- biometric information such as food preferences/restrictions/allergies and other medical conditions to be known in the event of an emergency and necessary for your safety as part of your participation in an activity or event organized by the Queen Elizabeth Health Complex Foundation.
- information relating to marketing and communications preferences, as well as related information such as dietary preferences, comments, and survey responses.
- information relating to giving history, participation in events, billing, and financial information, such as a billing address, bank account information or payment data. **We do not store any information relating to credit card numbers.**
- information on your professional background, your networks, your social involvement, your professional affiliations, and family ties.
- recruitment information, such as a curriculum vitae, education and employment history information, details regarding professional affiliations and other information relevant to potential recruitment by the Queen Elizabeth Health Complex Foundation.
- information about website usage and other technical information, such as details about visits to our website, your interaction with our advertising and online content, or information collected through cookies and other tracking technologies.
- information such as your donation and community investment policy, your contributions, the beneficiary organizations and what they are dedicated to if applicable, the recognition obtained, the decision-making process and the people involved in the organization and this process.
- any other personal information provided. Please note that if you provide us with personal information about other people (such as your customers,

directors, officers, shareholders, or beneficial owners), you must ensure that you have properly notified them that you are providing their personal information to us. information and to have obtained their consent to such communication of information.

- where applicable, evidence of the consent given to us (date, time, means), in circumstances where such consent is necessary for the processing of personal information.

3. How do we collect your information?

We collect your personal information from you and during our interactions with you, as follows:

- When registering for events, activities, and newsletters.
- When you make a donation to our organization, whatever the form of your donation.
- When you send your application for a vacant position.
- When you register as a volunteer for our organization.

We also collect publicly available information including on public platforms, including our website.

4. How do we use personal information?

We may use personal information in any of the ways set out below, with your consent or, where applicable, another legal basis. In each case, we indicate for what reasons we use your personal information:

- To ensure the safety of participants, employees and volunteers during our activities and events.
- To make our website easier to use, ensure that content is relevant and that content on our website is presented in the most effective way for you and your device.
- For business development purposes – to provide mission details, information on the development of our organization and our sector and invitations to events where an individual has opted in to receive such information.

- For philanthropic prospecting purposes, by launching appeals for donations or inviting you to renew a donation. At all times, we stop communicating with donors who no longer wish to receive this type of communication. You can withdraw your consent to communicating with us at any time using the contact details indicated in the [“How to contact us?”](#) section.
- For research and development purposes (including from a security perspective) – to carry out analyses to better understand the socio-demographic portrait of our community, our donors, and participants in our events.
- For recruitment purposes – to enable us to process job applications and assess whether an individual meets the requirements of the position for which they may apply at the Queen Elizabeth Health Complex Foundation.
- To meet our legal, regulatory or risk management obligations.
- To prevent fraud and/or conduct other background checks that may be required at any time under applicable law or regulation and/or best practices (if false or inaccurate information is provided or if fraud is observed or suspected, information may be transmitted to fraud prevention organizations and may be recorded by us or by such organizations). When we process special category personal information, we may also rely on important public interest (prevention or detection of crime) or legal claims.
- To enforce our rights, to meet our legal or regulatory obligations regarding the communication of information or to protect the rights of tiers.
- In order to reorganize or change our organization – if we undertake a reorganization (for example, by merging, consolidating or transferring part of the mission of our organization), we may need to transfer some or all of the personal information to an applicable third party (or its advisors) in connection with any due diligence process or transfer to such reorganized entity or third party for the same purposes as set out in this Confidentiality Policy or for the purposes of analyzing any proposed reorganization. In such a situation, we will take all possible means to ensure the protection and security of personal information.

5. Who do we share personal information with?

The Queen Elizabeth Health Complex Foundation is a legal entity (a non-profit organization duly incorporated and recognized as a charitable organization). We may share personal information with certain third parties, including the following:

- Volunteers and employees of the Queen Elizabeth Health Complex Foundation for the purposes of recruiting human resources, and volunteers and the purposes of soliciting financial or other contributions.
- Third-party service providers and/or partners, in particular those who could provide us with donation solicitation, database analysis, website, application development, hosting, maintenance, and coaching services. security and other services. These third parties may have access to or process personal information as part of the services they provide to us. **We limit the information we provide to these service providers to only that information that is reasonably necessary to enable them to perform their functions, and our contracts with these service providers require them to safeguard the confidentiality of this information.**
- Government authorities and law enforcement agencies when required by applicable laws. For greater clarity, we may disclose personal information and other information if we are required to do so by laws, including tax laws, or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or government subpoena or search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies.

We will only use personal information for the sole purpose of fulfilling the primary purpose and applicable legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

The organization uses the services of third-party sites, such as Google and Facebook, to promote its content and offers.

When you visit our website, these third parties may use cookies, web beacons or other similar technologies on your hard drive to collect or receive information about your browsing on the website and elsewhere on the Internet. These technologies make it possible to deliver relevant and targeted advertising based on your interests. You can view

cookies and destroy them if you wish. So, you have full control. We advise you to refer to your browser settings to make the appropriate changes.

If you would like third-party sites to store cookies on your hard drive in order to provide you with targeted advertising, you can enable this option.

6. How long do we keep personal information?

We will only retain personal information for as long as necessary for the purposes set out in this Personal Information Confidentiality Policy and to comply with our legal and regulatory obligations.

To find out more about how long we retain personal information, please contact us using the information provided under [“How to contact us?”](#).

7. Where do we store personal information?

The personal information collected is kept in a secure and recognized database.

All documents containing personal information that we may print are kept in secure locations such as lockable filing cabinets.

8. How do we protect personal information?

We follow generally accepted industry standards to protect the information submitted to us, both when transmitted and once we receive it. We maintain appropriate physical, technical or administrative safeguards to protect personal information against accidental or unlawful destruction, accidental loss, modification, unauthorized disclosure or access, misuse, or other unlawful form. processing of personal information in our possession.

We have taken steps to ensure that the only personnel who have access to your personal information are those who have a need to know it or whose duties reasonably require the information to be known.

All Foundation staff members sign a confidentiality agreement for personal information to which they may have access as part of their duties. Electronic information is stored in a secure database and on the Foundation's server. Several servers with restricted access allow better management and protection of more sensitive information. In addition,

physical files are kept inside the Foundation's premises, and, depending on their nature, in lockable filing cabinets.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Although we take security measures specific to ensuring the protection of personal information and which are reasonable considering their sensitivity, the purpose of their use, their quantity, their distribution and their medium, we, therefore, cannot ensure or warrant the security of any information you transmit or provide to us, and you do so at your own risk.

We also cannot guarantee that such information will not be accessed, obtained, disclosed, modified, or destroyed because of the violation of our physical, technical, or administrative safeguards. If you have reason to believe that personal information has been compromised, please contact us using the contact information provided under [“How to contact us?”](#).

If a confidentiality incident occurs affecting your personal information, we undertake to notify you as soon as possible following our knowledge of this incident. We will take reasonable measures to reduce the risk of harm being caused and prevent new incidents of the same nature from occurring.

9. What rights does an individual have regarding their personal information?

In certain circumstances and in accordance with applicable data protection laws, an individual has the following rights:

- **Access:** the right to ask whether we are processing information and, if so, to request access to that personal information. Subject to applicable law and, where applicable, the payment of a monetary sum to cover the costs incurred by transcription, reproduction and transmission, the person may thus receive a copy of the personal information that we hold and certain other information concerning her. The amount payable may vary depending on the request and is transmitted in advance to the person submitting an access request.
- **Accuracy:** we are required to take reasonable steps to ensure that the personal information in our possession is accurate, complete, non-misleading and up to date.

- Rectification: the right to request rectification of any incomplete or inaccurate personal information we hold.
- Deindexation: the right to ask to stop disseminating their personal information or to deindex any hyperlink attached to their name giving access to information if this dissemination causes them harm or contravenes the law or court order (right to erasure or oblivion).
- Anonymization: the fact that our organization can, instead of destroying it, anonymize personal information to use it, but only for serious and legitimate purposes (e.g.: retention of information required for possible tax inspection purposes).
- The right to be informed when you are the subject of a decision based exclusively on automated processing.
- The right to be informed when using identification, location or profiling technology and the means offered to activate these functions.

Finally, it is also possible to file a complaint with a data protection supervisory authority, more particularly in the country, province, or state in which you normally reside (in Quebec, *the Commission d'accès à l'information*), in which we are located or in which an alleged breach of data protection laws has been committed.

To exercise any of these rights, please contact us as indicated in the [“How to contact us?”](#) section.

10. How do we use cookies and similar technologies?

The QEHC Foundation website uses cookies to help you navigate efficiently and perform certain features. Detailed information on all cookies can be found under each consent category accessible on the website. A banner is automatically displayed and allows you to manage or refuse cookies.

Cookies that are categorized as “necessary” are stored on your browser as they are essential to enable the basic functionality of the website. We also use third-party cookies that help us analyze how you use this website, store your preferences, and provide you

with content and advertising that is relevant to you. These cookies will only be stored in your browser with your prior consent.

You can choose to enable or disable some or all these cookies, but disabling some of them may affect your browsing experience.

11. How to contact us?

To ask questions, make comments or make a complaint regarding this Policy on the protection of personal information or about personal information, exercise your rights, or file a complaint, please communicate by email at gehc.foundation@gehc.org, by telephone at (514) 485-5018 or by mail at the following coordinates:

Queen Elizabeth Health Complex Foundation

Ms. Elaine Lalonde
2100 Marlowe Avenue
Suite 331
Montreal, QC H4A 3L5

This policy was updated on June 12, 2024. It has been approved by our Privacy Officer.