

Alzheimer Society of Manitoba

PRIVACY POLICY

Effective: March 1, 2016

Updated January 2023

The Alzheimer Society of Manitoba is part of the Alzheimer Society Federation in Canada (“Federation”). The Federation is a collective of the various Alzheimer Societies across Canada including the Alzheimer Society of Canada and provincial and regional societies (collectively referred to as “Federation Partners”). For a complete list of the Federation Partners, please see Schedule A at the end of this Privacy Policy. The Federation is a nation-wide movement to support individuals and families with Alzheimer’s disease and other dementias, and to find a cure for the disease. The Federation Partners are committed to working together in support of this vision and mission of the Federation. In this regard, in order to allow the Federation Partners to work together to fulfill the Federation’s mission, Personal Information provided to the Alzheimer Society of Manitoba may be shared between the various members of the Federation.

The Alzheimer Society of Manitoba (“ASM” or “we”) knows how important your privacy is to you. Our relationship with you is founded on trust and we are committed to maintaining that trust. The ASM recognizes that your right to privacy is an essential issue and understands your interest in protecting your Personal Information. For these reasons, the ASM Privacy Policy incorporates high standards as set out in federal and provincial Canadian privacy legislation and confirms our dedication to protecting your privacy and maintaining the trust that you have placed in our organization. This Privacy Policy may be updated from time to time by ASM at which time we will give you reasonable notice. Please check our website periodically to see the current Privacy Policy.

For the purposes of this Privacy Policy, “Personal Information” refers to any information about an identifiable individual. Information will be about an “identifiable individual” where there is a serious possibility that an individual could be identified through the use of that information, alone or in combination with other information.

1. **Collection of Personal Information**

ASM is committed to identifying the purposes for which Personal Information is collected at or before the time the information is collected, and to documenting the purposes for which Personal Information is collected. The Personal Information we may collect from you includes:

- name
- contact information (address, email, and/or phone, title)
- relationships

When you provide us with your Personal Information we assume you consent to our collecting it and using it for the specific purposes identified at the time of the collection or in this Privacy Policy. We do not collect Personal Information indiscriminately and we do not collect any information about you unless you provide it to us willingly.

2. **Use of Personal Information**

The above noted Personal Information we collect from you may be used by ASM and Federation Partners for the following limited purposes:

- To cross-reference Personal Information between and amongst all Federation Partners
- To enable ASM to share information with you about our upcoming events and/or programs and services
- To invite you to make a donation to help support the work of ASM

Some of the Personal Information we collect is needed in order to satisfy the requirements of Canada Revenue Agency (CRA). We may provide further details to you about Personal Information that we collect or uses that we may make of your Personal Information either at the time we ask you to provide that information or through changes to this Privacy Policy. Although you may choose to not share your Personal Information with us, if you choose not to do so, your involvement in our activities and the work of ASM may be limited.

If at one time you provided your Personal Information for any of the above reasons, or any additional reason, you may unsubscribe by contacting the Chief Privacy Compliance Officer whose information can be found at the bottom of this Privacy Policy.

3. **Disclosure of Personal Information**

By providing your Personal Information to us, you have confirmed your trust in us. We are honored by this and take pride in serving you. ASM may share your Personal Information in the following limited ways. If you would like to withdraw your consent to the disclosure of the Personal Information, please contact our Chief Privacy Compliance Officer whose contact information can be found at the bottom of this Privacy Policy. Please note that the withdrawal of your consent may impact on our ability to serve you and to maintain your relationship with us.

- Personal Information may be shared as necessary between and amongst all Federation Partners for the purposes stated within this Privacy Policy or disclosed at the time of collection

Personal Information may also be disclosed without your consent if required by law or by order or requirement of a court, administrative agency or governmental tribunal; where the society believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group.

ASM remains responsible for Personal Information in its possession or custody, including information that we transfer to a third party for processing or for storage. As such, ASM enters into confidentiality or contractual agreements with third parties which are engaged to perform services on its behalf and to whom we transfer Personal Information for processing or storage requiring them to provide a level of security comparable to that provided under its Privacy Policy.

4. **Storing, Processing and Securing Personal Information**

ASM stores and maintains Personal Information in conformity with the requirements of the *Personal Information Protection and Electronic Documents Act* and the Model Code for the Protection of Personal Information created and approved by the Canadian Standards Association. When we use third party service providers for storing or processing of Personal Information, we use contractual or other means to ensure that your Personal Information is protected. In some cases, third party service providers may store or transfer Personal Information in or to countries where compliance with Canadian privacy laws cannot always be guaranteed. Please rest assured that ASM makes reasonable efforts to contract only with trustworthy service providers who are committed to protecting the privacy of your Personal Information.

We use a variety of secure means to store and safeguard your Personal Information. These include:

- Password protected databases with access limited to authorized staff.
- All paper-based information is stored either in a locked filing cabinet or in a secure offsite storage facility. The information is stored for seven years as per CRA legislative rules. After seven years the information is shredded offsite by a company that follows strictest industry standards for safeguarding information and data security.
- All ASM electronic files are saved on a password protected secure network. All network traffic routes through a firewall that is regularly monitored by an IT company that follows industry standards for protecting and safeguarding information and data security.
- Building premises are secured by an Alarm system that is monitored 24/7. Off hours access is limited to authorized staff.

Relevant staff members of ASM have access to your Personal Information as required, and only as reasonably necessary on a need-to-know basis to fulfill the purposes identified upon the collection of the information, or for the purposes stated in this Privacy Policy, for example to

organize fundraising campaigns, process donations, or fulfill marketing and communication purposes.

5. **Website Use**

ASM may collect and use an individual's IP address, and date and time that the individual accessed our website, to help identify the individual, gather broad demographic information about users of the website, diagnose problems with our systems, and administer the website.

Depending on an individual's browser settings, the website may use cookies. A cookie is a tiny element of data that a website can send to an individual's browser, which may then be stored on their hard drive so the website can recognize them when the individual returns to the particular website. We use cookies to deliver content according to the individual's preferences and to save the individual's log-in information for the message board so that the individual is not required to re-enter it while the individual uses the website. If an individual's browser settings do not accept cookies from our website, they may not be able to take advantage of all of the features of the website.

We use “Google Analytics” to collect information about use of the website. Google Analytics is a web analytics service that uses cookies to track information about the use of the website such as how often users visit the sites, what pages they visit when they do so, and what other websites they used prior to coming to the website. This information is used to improve website. Google Analytics only collects the IP addresses assigned to you on the date you visit the site, rather than your name or other identifying information about an individual. Information collected through the use of Google Analytics is not combined with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to the website is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Google Analytics stores information on servers in the United States and the governments, courts or law enforcement, or regulatory agencies of the United States may be able to obtain disclosure of Personal Information through the laws of the United States. You can prevent Google Analytics from recognizing you on return visits to the website by disabling cookies on your browser. If you choose, you can opt out by turning off cookies in the preferences settings in your web browser. For more information on Google Analytics, please visit: <http://www.google.com/analytics/>.

6. **The Model Code for the Protection of Personal Information**

ASM applies the ten principles of the Model Code for the Protection of Personal Information when collecting, using or disclosing your Personal Information:

(i) **Accountability**

ASM is responsible for the Personal Information collected and maintained by it and which is under its control. In order to fulfill this responsibility, we have designated a Chief Privacy Compliance Officer whose contact information is available at the bottom of this Privacy Policy, to be responsible for the day-to-day care and control of Personal Information. We have taken the following measures to ensure compliance with this Privacy Policy:

- (a) Developing procedures to protect Personal Information;
- (b) Developing procedures to receive and respond to complaints and inquiries;
- (c) Training our staff about our policies and practices respecting Personal Information; and
- (d) Developing and distributing information to our staff and the general public explaining our policies and procedures respecting Personal Information.

(ii) Identifying Purposes

ASM is committed to openness to you regarding its collection and use of Personal Information, as discussed above. To demonstrate this openness, we require the consent of individuals prior to using their Personal Information for any purpose other than that for which it was originally collected or stated within this Privacy Policy. Similarly, if any individuals wish to be advised of the Personal Information we have related to them, they can contact us at the address set out below.

(iii) Consent

ASM is committed to ensuring that you are aware of how your Personal Information is used. We are dedicated to obtaining the informed consent of individuals who provide us with their Personal Information. If your Personal Information is to be used for a new purpose not previously identified at the time of collection or in this Privacy Policy, consent for that new purpose would be obtained. To this end, all our employees, personnel or agents are instructed to provide information about how Personal Information is used by us to all interested individuals who inquire, as well as obtain the informed consent of those who provide their Personal Information. As well, we may periodically request written confirmation from you to ensure that the Personal Information collected and maintained by us is up-to-date and accurate. We also may ensure that we have your continuing consent to use and retain your Personal Information. We will not disclose your Personal Information, without your consent. It will only do so if required by law or in the good faith belief that such action is necessary to:

- (a) conform to obligations imposed by law or statute;
- (b) meet an emergency need; and/or
- (c) as required pursuant to a criminal investigation.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the Chief Privacy Compliance Officer. Please note that the withdrawal of your consent may impact on our ability to serve you and to maintain your relationship with us.

(iv) Limiting Collection

ASM restricts the collection of Personal Information only to that information that is necessary for the limited purposes noted above. We are committed to collecting Personal Information in a

fair, open and lawful manner. For this reason, we do not indiscriminately collect Personal Information. We collect Personal Information to fulfill the above-noted purposes only, and for no other purposes.

(v) **Limiting Use, Disclosure and Retention**

ASM does not use Personal Information for purposes other than those for which it was originally collected or stated in this Privacy Policy unless it has first obtained the consent of the person from whom such information was received. We retain Personal Information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected, or for as long as legally required. Once Personal Information is no longer needed, it is shredded and disposed of. When disposing of or destroying Personal Information which is no longer needed, we ensure the appropriate measures are taken regarding the disposal or destruction so as to prevent unauthorized parties from gaining access to the information. ASM ensures that any third party service providers are following our policies regarding the retention and destruction of Personal Information.

(vi) **Accuracy**

ASM is committed to maintaining accurate, complete and up-to-date Personal Information. If you are aware of changes to the Personal Information you have given to us, simply inform us of the changes and we will update our records accordingly. You may check and correct your Personal Information by contacting the Chief Privacy Compliance Officer assigned to oversee the day-to-day care and control of Personal Information by writing or emailing your request to the address set out below.

(vii) **Safeguards**

ASM has developed and implemented security safeguards appropriate to the sensitivity of the Personal Information kept by us. We also ensure that any of our employees who deal with Personal Information are properly trained and are aware of the necessary and appropriate measures required to protect Personal Information. Any Personal Information kept by us is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected.

(viii) **Openness**

ASM makes information about its policies and practices respecting the collection and maintenance of Personal Information available to all interested parties. We are pleased to answer any questions that you may have regarding the collection and maintenance of Personal Information. Please forward any questions in writing or email to the address set out below.

(ix) **Individual Access**

You can also request access to your Personal Information held by us. However, we reserve the right to confirm the identity of the person seeking access to Personal Information before complying with any access requests. Please forward your access request in writing or email to the address set out below.

(x) **Challenging Compliance**

As noted above, ASM has designated an official who is responsible for the day-to-day care and control of Personal Information. This official will receive and respond to all information requests regarding our privacy policies or about your Personal Information under our care and control. We investigate all complaints received by us and will respond in writing in a timely manner. If any complaint is found to be justified, then we will take appropriate measures to resolve the matter to the satisfaction of the complainant.

7. **Additional Information**

Further to this [general privacy policy] additional policies and procedures governing the collection, storage, use and destruction of personal health information pursuant to the Personal Health Information Act are available.

If you would like more information about our policies, or if you would like to access or correct the Personal Information we have about you in our records, then please contact our Chief Privacy Compliance Officer by email or in writing, as provided below:

ATTENTION: CHIEF PRIVACY COMPLIANCE OFFICER

Tiffany Harder – Database Officer
Alzheimer Society of Manitoba
10-120 Donald Street
Winnipeg, Manitoba
R3C 4G2
tharder@alzheimer.mb.ca

SCHEDULE A: FEDERATION PARTNERS

National

Alzheimer Society of Canada

Provincial Societies¹

Alzheimer Society of Alberta and Northwest Territories

Alzheimer Society of British Columbia

Alzheimer Society of Manitoba

Société Alzheimer Society New Brunswick / Nouveau-Brunswick

Société Alzheimer Society Newfoundland & Labrador

Alzheimer Society of Nova Scotia

Alzheimer Society of Ontario

Alzheimer Society of Prince Edward Island

Alzheimer Society of Québec Alzheimer Societies

Alzheimer Society of Saskatchewan

¹ For Yukon and Nunavut please contact the provincial Alzheimer Society office closest to where you live.