



## **Stella's Place Privacy Policy**

**Last Updated: June 30, 2016**

### **1. About Stella's Place**

Stella's Place is a not-for-profit organization in Toronto, Canada that serves individuals between the ages of 16 and 29 who are experiencing mental health challenges. Stella's Place provides information about available support services and facilitates a path forward for its clients. Stella's Place provides services online and from its facility in downtown Toronto. Those services include peer support and clinical, employment, wellness, and recovery services among others.

### **2. Purpose/Amendment of this Privacy Policy**

Stella's Place values the privacy of individuals who provide it with their personal information and has implemented privacy policies and practices in an effort to treat such personal information respectfully and protect it from theft, loss and unauthorized access, use and disclosure.

This Privacy Policy ("**Policy**") provides an overview of how Stella's Place manages personal information it collects about clients and donors and information it collects automatically through electronic means.

Stella's Place may revise this Policy from time to time in response to changes in its practices or applicable privacy law, and/or regulatory or other direction. The date of the last revision will appear at the top of the Policy. It is important that you review the Policy if the date indicates that it has been revised since you last interacted with Stella's Place to ensure that you are familiar with our current information management practices.

### **3. Personal Information**

In this Policy, personal information means:

- a. in relation to a client of Stella's Place, information regarding his or her health, health history, health care/services, health care/services providers, including information such as contact information where it is provided in connection with such health information; and
- b. in relation to donors who are individuals (as opposed to corporations or other business entities), information identifying the donor, including information about his or her donation.

To the extent that personal information is provided by an individual other than the individual to whom the information relates, Stella's Place will understand that the individual providing the information has the consent or otherwise is authorized to provide the information to Stella's Place for use and disclosure in accordance with this Policy. No person is permitted to disclose the personal information of another person to Stella's Place without such consent or authorization.

#### **4. How Stella's Place uses the personal information it collects**

Stella's Place collects and uses personal information for purposes that include:

In relation to clients:

- recognizing an individual as a client and for any services that involve an online account, managing that account;
- communicating with a client or where permitted, a family member or representative of a client;
- providing information and making recommendations about applicable available support services;
- providing a client with services, including peer support and/or counselling;
- maintaining a record of the services provided to a client;
- billing for services covered by OHIP or another insurance plan;
- compliance with legal requirements including record-keeping and billing;
- educating support workers and counsellors to provide the services we offer;
- quality control and quality improvement activities, which may include supervisor review of clinical progress notes and/or assessment materials;
- program development and refinement (which may involve the use of information about client needs and the effectiveness of particular services); and
- seeking consent.

In relation to donors:

- reporting to internal accounting personnel, as required to allocate revenue by source for audit purposes;
- providing receipts for taxes purposes; and
- communicating in connection with permission for donor recognition including listing on our website.

Generally:

- as permitted by law, including for proceedings or contemplated proceedings.

#### **5. Disclosure of personal information by Stella's Place**



Stella's Place may disclose personal information as follows and for the following purposes:

- to other health care providers involved in providing or assisting in providing you with health care;
- to determine your eligibility to receive health care/services or benefits;
- for proceedings or contemplated proceedings;
- to a potential or actual successor of Stella's Place in the event that Stella's Place undergoes a reorganization, is considering or ceases to operate;
- to the Ministry of Health and Long-Term Care and its agents, to the health profession regulatory bodies governing the practices of some of our providers, to the Public Guardian and Trustee; and
- as required by law.

Also, if you tell us that you or someone is at serious risk of harm, it is our responsibility to involve the appropriate authorities or take other appropriate action to reduce or eliminate that risk.

## **6. Collection and use of information through the Website**

### **(a) General**

The following information relates specifically to the automatic electronic collection of information through the Stella's Place website located at [www.stellasplace.ca](http://www.stellasplace.ca) or any other interactive electronic channels or platforms made available by Stella's Place from time to time, including other websites and Stella's Place specific pages on social media sites (all such channels and platforms referred to collectively as the "Website"). The information to which these provisions apply is not necessarily personal information.

If you use the Website to provide Stella's Place with information, you will be understood to have agreed that Stella's Place may collect, use, disclose and otherwise manage that information in accordance with the Website Terms of Use. It is therefore imperative that you take the time to read the Terms of Use before using the Website. The **Terms of Use** can be found at [www.stellasplace.ca/a/pdfs/StellasPlace-TermsOfUse.pdf](http://www.stellasplace.ca/a/pdfs/StellasPlace-TermsOfUse.pdf).

In addition to the Terms of Use, to the extent that you provide Stella's Place with personal information through the Website, you will be understood to have agreed that Stella's Place may collect, use, disclose and otherwise manage that information in accordance with this Policy.



While Stella's Place strives to protect the information we collect through the Website, we cannot ensure or warrant the security of information transmitted over the Internet, including email which is vulnerable to interception and impersonation. Please do not provide us with personal information over the Internet that you intend be kept confidential. If you have questions or concerns about whether it is safe to transmit personal information through any particular part of the Website, please contact our privacy officer as indicated at the bottom of this Policy.

#### **(b) Use of Cookies**

Like many websites, the Website uses “cookies”, which are pieces of information that a web server places on a visitor's computer during a visit to a site, to improve the user experience and provide information about site usage. The use of cookies allows for faster and simpler navigation around the Website. We make no attempt to link IP addresses that do not contain the name of a visitor with his or her identity.

We also use the usage data we collect through cookies to determine the value of particular parts of the Website to our visitors and make changes in response.

Visitors who wish to opt out of having cookies placed on their computer should decline cookies (an explanation of how to decline is generally available from browser providers or their support services). Note that declining cookies may negatively impact the Website's performance.

#### **(c) Use of Google Analytics**

Stella's Place also uses Google Analytics to gather information about traffic on parts of the Website for statistical analysis of visitor behavior and identifying trends, to allow us to enhance the design and improve the content of the Website and more generally, to better understand our visitors so as to be better able provide the information and services that they would find helpful.

Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of the Website [www.stellasplace.ca](http://www.stellasplace.ca) to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Google collects cookies and usage data and processes such information in the United States. For more information on Google's use of information collected through Google Analytics, please consult Google's privacy policy, posted at <http://www.google.com/intl/en/policies/privacy/> and the section of the privacy policy entitled “How Google uses data when you use our partners' sites or apps”, located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

Anyone wishing to opt out of Google Analytics data collection should consult Google's instructions on downloading and installing the “Google Analytics Opt-out Browser Add-on”, posted at <https://tools.google.com/dlpage/gaoptout>.

#### **(d) Donating through the Website**



Donors who choose to make a donation to Stella's Place through the Website's 'Donate Now' option will be linked to Donor Perfect, a third party providing services to donors. Donor Perfect requires certain information from donors to process their gift and ensure they receive an official tax receipt. Donors who choose to use the services of Donor Perfect will be bound by terms and conditions established by Donor Perfect. Stella's Place does not govern those terms and conditions and will not be responsible for issues or liable for claims or damages arising from or connected with a donor's use of the Donor Perfect site or services. For clarity, donor use of the Donor Perfect site and services is governed by Donor Perfect's terms of use and privacy policy. The Donor Perfect site is a third party site the use of which is addressed in the "External Links" section of the Website Terms of Use. Donors who do not agree to the terms of use of the Donor Perfect site may make their gift by **contacting our development team at 416.461.2345 or [donate@stellasplace.ca](mailto:donate@stellasplace.ca)**

## **7. Practices in relation to donor personal information**

Our practices in relation to donor personal information have been shaped by guidance documents that include the:

- Ethical Fundraising and Financial Accountability Code of Imagine Canada (formerly the Canadian Centre for Philanthropy); and
- Code of Ethical Principles and Standards of Professional Practice of the Association of Fundraising Professionals ("AFP").

## **8. Security**

Stella's Place uses various physical, electronic and procedural means to safeguard personal information, as well as information identifying employees and volunteers, that we have collected. We limit access to such information to our employees and other staff members, volunteers and affiliated third party health service providers who require the information to provide services to the client to whom the information relates.

We provide training to our employees and other staff members and volunteers about their responsibilities in relation to personal information. In relation to donor personal information, we employ fund raising professionals who are trained in the AFP Code of Ethical Principles and Standards of Professional Practice. In addition to training, we employ administrative safeguards such as reference checks of prospective employees.

We use technical safeguards such as passwords and firewalls to control access to our electronic information systems.

We also use physical safeguards such as locked filing cabinets, restricted access to offices and other areas where personal information is stored and controlled entry to our premises.

## **9. Email communications, subscribing and unsubscribing**



uncover.  
discover.  
recover.

We will not send you emails or other electronic messages regarding our programs and events unless you subscribe for them. You may subscribe by using the signup form at the bottom of every page on the website ([www.stellasplace.ca](http://www.stellasplace.ca)).

## **10. Service providers**

Stella's Place uses external service providers to deliver certain services on its behalf that require access to personal information. We have contracts with these service providers prohibiting their use or disclosure of personal information for any purpose other than to provide their services to Stella's Place.

## **11. Access and Correction, Inquiries and Concerns, Contact**

Requests for access to personal information must be made in writing, to prevent the inadvertent disclosure of information to anyone except the person to whom the information relates or his or her authorized representative. Requests for access to or the correction of personal information should be directed to our privacy officer as indicated below.

Any questions, concerns or complaints about our personal information practices, and/or management of specific personal information or information about volunteers, should also be directed to our privacy officer.

Privacy Officer Contact:

Phone: 416.461.2345

Email: [info@stellspplace.ca](mailto:info@stellspplace.ca)

Post: Stella's Place, Privacy Officer  
18 Camden Street  
Toronto, ON M5V 1V1