



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 peer, clinical, and wellness support services and facilitates a path forward for its participants. Stella's Place provides services online and from its facility in downtown Toronto.

2. Purpose and Amendment of this Privacy Policy

Stella's Place values the privacy of individuals who provide us with their personal information. We have implemented comprehensive 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 the personal information it collects about participants and donors and information it collects automatically from users of the website through electronic means. Stella's Place may revise and amend 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 the user's responsibility to make sure they are familiar with our current information management practices.

3. Personal Information

In this Policy, personal information means:

- a. in relation to a participant of Stella's Place, information identifying the participant and other personal health information (PHI) regarding the participant's health, health history, health care/services, and contact information for past or current health care/services providers where it is given in order to provide health care; 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 collection, 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

In relation to participants, Stella's Place collects and uses personal information and personal health information for purposes that include:

- Recognizing an individual as a participant.
- Seeking and obtaining participant consent.
- For any services that involve an online account, managing that account.
- Communicating with a participant, or where permitted, a family member or representative of a participant
- Providing information and making recommendations about applicable available support services.
- Providing a participant with services, including peer support and/or counselling.
- Maintaining a record of the services provided to a participant.
- Billing for services covered by OHIP or another insurance plan.
- Compliance with legal requirements including record-keeping and billing.
- Educating peer support workers and clinicians 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).
- As permitted or required by law, including for proceedings or contemplated proceedings.

In relation to donors, Stella's Place collects and uses personal information for purposes that include:

- Reporting to internal accounting personnel, as required to allocate revenue by source for audit purposes.
- Providing receipts for taxes purposes.
- Communicating in connection with securing permission for donor recognition including listing on our website.
- As permitted or required by law, including for proceedings or contemplated proceedings.



5. Disclosure of Personal Health Information by Stella's Place

Stella's Place complies with the Personal Health and Information Protection Act (PHIPA) regarding all sharing and disclosure of participant personal health information (PHI) to others. Whenever required by law, Stella's Place will obtain participant consent to disclose PHI.

Stella's Place may disclose the personal health information of current or past participants as follows:

- To other health care providers in a participant's circle of care for the purposes of providing health care.
- To other health care providers outside of the circle of care, without participant consent, if it is deemed reasonably necessary for the purposes of providing health care and consent cannot be obtained in a timely manner (e.g., in a health emergency).
- To determine eligibility to receive health care/services or benefits where they are funded by the Government of Canada, the Government of Ontario or a municipality.
- As required by law 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 or ceases to operate.
- To the Ministry of Health and Long-Term Care and its agents for the provision of payment or reimbursement.
- To the Ministry of Health or another public health authority to prevent or mitigate a public health emergency.
- To the health profession regulatory bodies governing the practices of some of our providers.
- To report to the appropriate authorities or to take other appropriate action in order to eliminate or reduce a significant risk or serious bodily harm to a person or group of person.

6. Collection, Use and Confidentiality 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 and any other interactive electronic channels or platforms made available by Stella's Place, including external websites used to promote or provide Stella's Place services (e.g., event planning or ticketing websites) and Stella's Place specific pages on social media sites (e.g., Facebook, Twitter, Instagram). All



such channels, platforms, social media pages, and service affiliations are referred to collectively as the “Website”.

The information to which these provisions apply is not necessarily limited to 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 *Stella’s Place Website Terms of Use*. It is therefore imperative that you take the time to read the *Stella’s Place Website Terms of Use* before using the Website.

In addition to the *Stella’s Place Website 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 personal information in accordance with this Policy.

Please do not provide us with personal information over the Internet that you intend be kept confidential. 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. 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 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 uses Google Analytics to gather information about traffic on parts of the Website for:

- statistical analysis of visitor behavior;
- identifying trends;
- enhancing the design and improving the content of the Website; and
- understanding our visitors in order to provide the information and services that they want.

Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of the Website 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](#) and the section of the privacy policy entitled "[How Google uses data when you use our partners' sites or apps](#)".

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](#)".

(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 service agreement](#) 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 Stella's Place 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.



7. Practices in Relation to Donor Personal Information

Stella's Place respects the privacy of our donors and only collects and keeps the information we need to properly secure, identify, handle, direct, administer and acknowledge a donation.

All information concerning donors or prospective donors, including names, addresses and telephone numbers, and the amount of the gift shall be kept strictly confidential by Stella's Place employees, unless written permission is obtained from donors to release such information.

With every gift, the donor will be provided a way to:

- Remain anonymous if they wish to do so.
- Give permission to make their name, organization, and gift amount public in order to receive philanthropic recognition in the community.
- Stipulate how their name should appear if they wish to be identified as a donor.
- Name a person who they are donating in honour of.
- Opt out of receiving general news and information about Stella's Place.

Our complete policy and practices in relation to donor personal information are outlined in the Stella's Place Fundraising Policy and have been shaped by guidance documents that include:

1. The Association of Fundraising Professionals (AFP) [Bill of Rights](#)
2. The Association of Fundraising Professionals (AFP) [Code of Ethical Standards](#)
3. The Canadian Association of Gift Planners (CAGP) [Code of Ethics](#)

8. Security

Stella's Place uses various physical, electronic and procedural means to safeguard the personal information of participants, donors, and website users that we have collected. We limit access to said personal information to only the employees and affiliated third party information and health service providers who require the information to provide services to the participant, donor, or website user to whom the information relates.

We provide training to our employees about their responsibilities in relation to personal information. In relation to donor personal information, we employ fundraising professionals who are trained in the AFP Code of Ethical Standards. In addition to training, we employ administrative safeguards such as requiring 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,



restricting access to offices and other areas where personal information is stored and controlling entry to our premises.

9. Email Communications, Subscribing and Unsubscribing

Stella's Place complies with all federal, provincial and local laws, including Canada's Anti-Spam Legislation (CASL), that regulate email and other electronic messaging. We will not send you unsolicited email or other electronic messages regarding our programs, services, and events.

You may give consent to receive information from Stella's Place about our programs, services and events by subscribing to our email list from the link at the bottom of every page on the website (www.stellasplace.ca). All electronic communication from Stella's Place contains instructions on how to unsubscribe from receiving further email or notifications.

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. Requests, Questions, and Complaints

Requests for access and/or correction to personal information held by Stella's Place must be made in writing, to prevent the inadvertent disclosure of information to anyone except the person to whom the information relates or their authorized representative.

<p>Direct all internal requests, questions, and complaints about personal information and information practices at Stella's Place to:</p> <p>Privacy Officer Stella's Place 18 Camden St. Toronto M5V 1V1 416-461-2345 ext. 332 privacyofficer@stellasplace.ca</p>	<p>To make an external complaint about our information and privacy practices you may contact:</p> <p>Information and Privacy Commissioner of Ontario 2 Bloor Street East, Suite 1400 Toronto, ON M4W 1A8 416-325-3333 or 1-800-387-0073 https://www.ipc.on.ca/privacy/filing-a-privacy-complaint/</p>
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