



## **SHAD CANADA'S PRIVACY POLICY**

Shad Canada (or “we”, “us”, “our”) is committed to ensuring the protection of personal information of our visitors, (not limited to customers, applicants, parents/guardians, participants, funders, donors, alumni, volunteers etc) and users of the shad.ca web site (the “Website”) and our supporters. It is fundamental to the way we do business at Shad Canada in all our relationships, either on or off the Internet: we are committed to keeping personal information accurate, confidential, secure and private.

Shad Canada's policy is simple: we collect personal information about you only when you knowingly and willingly provide it, and we will not share or otherwise profit from the distribution of personal data beyond the use it was provided to fulfill.

Your privacy is of utmost importance to us. We strive to ensure our practices conform with applicable Canadian private sector privacy laws. Canada's privacy laws are based on ten inter-related fair information principles which are outlined below.

**By interacting with us, you consent to the collection, use and disclosure of your personal information, as provided in this Privacy Policy.**

Below, we have provided a short summary of the Privacy Policy's key elements, with the full version to follow. The reader (or “you”, “your”) may use the index to access specific sections of the Privacy Policy. However, we urge you to read the Privacy Policy fully and carefully to clearly understand how we may collect, use or disclose your personal information.

### **SUMMARY OF PRIVACY POLICY**

**We may collect the following personal information when you:**

- Use our Website and/or purchase from our store: IP address, time zone, cookies installed on your device. Additionally, as you browse the site, we collect information about the individual pages or products that you view, what websites or search terms referred you to the site and information about how you interact with the site;
- Apply for our program: name, contact information;
- Register for (accept an offer to attend) our program: in addition to the information collected above: payment information, health information, accommodation requests, emergency contact information;
- Otherwise contact us: name, contact information and any other information you provide;
- Make a donation: name, contact information, payment information.

**We may use your personal information for the purposes of operating our program, including:**

- To complete the registration process and process payments;
- To determine whether an applicant can fully participate in the program and whether Shad Canada can implement accommodation requests;



- To promote a safe participant experience and respond to emergency situations
- Compile non-identifiable statistics

**We may share your personal information with the following parties:**

- Service providers, including individuals and organization who are, or may be, involved in maintaining, reviewing and developing our systems, procedures and infrastructure.
- Parties contracted to design and deliver our program (for example, campus team members)
- To emergency health service providers and appropriate authorities, where necessary, in an emergent or emergency situation.
- To report demographical information to funders
- Persons outside of Shad Canada when they are required to receive this information in order to respond effectively to your query.

We may retain all communication indefinitely for purposes of improvement based on customer feedback.

**You may have the following choices, depending on the products and services accessed and your use of our Website:**

Your choices may include:

- **Cookies Settings and Preferences:** Cookies and tracking technologies may be disabled through browser settings. These actions will not prevent us from transacting with you, although it may negatively impact the user experience. You may also visit: <http://youradchoices.ca/choices>.
- **Marketing e-mails:** You may sign up for our mailing lists in order to receive notifications of when the application process opens and other relevant updates regarding the application process. You may unsubscribe at any time by contacting [info@shad.ca](mailto:info@shad.ca).
- **Opt-outs:** You may contact us at [info@shad.ca](mailto:info@shad.ca) to opt out/withdraw consent for the use and disclosure of your personal information, subject to legal and contractual restrictions.

In case of a breach of security safeguards, we will determine: whether the breach creates a real risk of significant physical, financial or reputational harm to you and will notify you and relevant regulatory authorities as appropriate and may notify other organizations or government institution that can reduce the risk or mitigate the harm from the breach.

How to contact us: For more information about this Privacy Policy and our practices or to obtain access to or correction or your personal information, please contact [privacy@shad.ca](mailto:privacy@shad.ca)



## **FULL VERSION OF PRIVACY POLICY**

- 1. What is personal information?**
- 2. What personal information do we collect and how do we collect it?**
- 3. Cookies and tracking technologies**
- 4. How do we use your personal information?**
- 5. The ten fair information principles**
  - Principle 1** – Accountability
  - Principle 2** – Identifying Purposes
  - Principle 3** – Consent
  - Principle 4** – Limiting Collection
  - Principle 5** – Limiting Use, Disclosure and Retention
  - Principle 6** – Accuracy
  - Principle 7** – Safeguarding Personal Information
  - Principle 8** – Openness
  - Principle 9** – Customer Access and Correction
  - Principle 10** – Handling Complaints and Suggestions
- 6. Your choices**
- 7. Links to other websites**
- 8. Contact us**
- 9. Updates**

### **1. What is personal information?**

Personal information means information about an identifiable individual, whose identity may be determined alone or in combination with other information. Personal information includes the health information of the individual.

This does not include de-identified or aggregated information where there is no serious possibility that an individual could be identified through the use of the information.

Applicable privacy laws generally do not apply to business contact information used for business purposes.

### **2. What personal information do we collect and how do we collect it?**

We may collect the following personal information as part of Shad Canada's program registration process or campus team member expression of interest where you otherwise contact or interact with us.

We may collect the following information when you access our Website: IP address, usage information

We may collect the following information when you first register and then apply to Shad Canada's programs:

- Applicant's email address
- Applicant's name, age/date of birth, gender
- School name and transcript information



- Information about personal experiences
- Bursary information including parent household income and number of dependents

For users that register on our Website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

We may collect the following information when you accept/register for Shad Canada's programs:

- Applicant's name, age/date of birth, gender
- Payment information
- Information re physical abilities (i.e. swimming ability)
- Health information, including emergency contact information, height, weight, family physician's name and contact information, emergency contact information, medical insurance, allergies, dietary restrictions, medications and immunizations, physical and mental health conditions, and medical clearance information

Psychometric analysis compiled through a third party with parental authorization We may collect the following personal information when you otherwise contact us:

- Name and contact information (i.e. telephone number, email address), in order to respond to your inquiry.

We may collect the following personal information when you make a donation:

- Donor name and contact information
- Payment information

Personal information may be collected online, by phone, by mailed letter or by fax.

### **3. Cookies and tracking technologies**

When you visit our Website, we use cookies to collect usage information. These small text files are placed on your hard drive and assist us in providing a more customized website experience.

Most browsers permit individuals to decline cookies. Please refer to your browser's help menu or other instructions to learn how to reduce or disable cookies. You can also learn more at [www.allaboutcookies.org](http://www.allaboutcookies.org). Declining cookies will not prevent us from transacting with you, but it may negatively affect your user experience on our Website.

In addition to your IP address, time zone and cookies, as you browse the site, we collect information about the individual pages or products that you view, what websites or search terms referred you to the site and information about how you interact with the site.



#### **4. How do we use your personal information?**

Shad Canada uses your personal information in order to:

- Complete the application process;
- Complete the registration process after an offer is extended;
- Process payments;
- Provide support and respond to inquiries;
- Create and/or update alumni profiles;
- Purchase from our store
- Improve the Website experience, including the quality and functionality of the Website; and
- Comply with any applicable law.

Shad Canada collects participant health information in order to:

- Determine whether an applicant can fully participate in the program;
- Assess whether Shad Canada can implement accommodation requests;
- Ensure Shad Canada team members can accommodate different participant's abilities (i.e. swimming abilities);
- To promote a safe participant experience; and
- To ensure Shad Canada team members can facilitate a participant's transfer to healthcare facilities in the case of an emergency situation.

Shad Canada may de-identify and/or aggregate personal information in order to use it for demographic/statistical analyses.

#### **5. The ten fair information principles:**

##### **Principle 1 – Accountability**

Shad Canada is responsible for all personal information under its control including any personal information disclosed to third parties for processing. Only those individuals who need access to the information to fulfill the intended use will have access to the information. Shad Canada has established policies and procedures to comply with its own privacy code and has designated one or more persons to be accountable for compliance. Please see the "Contact us" section for more information.

Shad Canada may disclose personal information to the following parties:

- Service providers, including individuals and organizations who are, or may be, involved in maintaining, reviewing and developing our systems, procedures and infrastructure.
- Parties contracted to design and deliver our program (for example campus team members)
- To emergency health service providers, where necessary, in an emergent or emergency situation.
- When you send us an email, you provide us with your name and email address, along with any other information you provide in the body of your email. This information may be shared with



persons outside of Shad Canada only when they are required to receive this information in order to respond effectively to your query. We retain all email correspondence as necessary for purposes of improvement based on customer feedback.

## **Principle 2 – Identifying Purposes**

If the purposes for collection, use and disclosure of personal information have not been provided in this Privacy Policy, Shad Canada will identify the purposes prior to collecting, using or disclosing personal information. Personal information will not be used for a purpose not previously identified without further individual consent, as specified below, unless the new purpose is required by law.

## **Principle 3 – Consent**

Knowledge and consent are required for the collection, use and disclosure of personal information, except where that information is de-identified for reporting to relevant interested parties at a summary level (gender, geographical demographics etc).

Unless permitted by law or provided for in this Privacy Policy, we do not collect, use or disclose personal information without first obtaining the consent of the individual concerned. We will seek the consent of the individual concerned in those cases where we wish to use their personal information for a new or different purpose.

Subject to legal and contractual restrictions, you are free to refuse or withdraw your consent at any point, with reasonable and advance notice. However, consent cannot be withdrawn retroactively. If your personal information is required to provide a product or service and you choose not to provide us with the required personal information, we will inform you of the consequences of the withdrawal of consent. We may not be able to offer you the products or services in question.

## **Principle 4 – Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified by Shad Canada.

## **Principle 5 – Limiting Use, Disclosure and Retention**

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

The retention timeline may vary to accommodate the purpose for which the personal information was collected and the nature of the information. If the retention period extends beyond the end of your relationship with us, it will be only for the timeframe required to respond to issues that may arise at a later date. When personal information is no longer required, we will destroy, delete, erase or convert it into an anonymous form. We do maintain information on our alumni including, their name, contact information, year attending Shad and any other generic information (notes to file) offered or obtained during our relationship with them. When alumni ask to be removed from contact lists, we mark their profile accordingly.



We do maintain information on our donors including their name, contact information, giving history, relationship to Shad (alum, parent, friend etc) and any other generic information (notes to file) offered or obtained during our relationship with them. When donors ask to be removed from contact lists, we mark their profile accordingly.

### **Principle 6 – Accuracy**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### **Principle 7 – Safeguarding Personal Information**

Shad Canada protects personal information with safeguards appropriate to the sensitivity of the information. Access to information gathered will only be available to those that need it to fulfill its intended purpose. Passwords to electronic files and locks on filing cabinets are employed to ensure that the information is protected. Furthermore, all computer systems require authenticated logins, servers are under restricted access and user passwords are encrypted within the database to ensure security. All administrative passwords are stored in locked filing cabinets and encrypted documents.

Upon employment, every employee of Shad Canada is required to sign a “Confidentiality Policy and Agreement” that ensures the confidential handling of business information including personal information. This agreement demonstrates our commitment, both collectively and as individuals, to protecting the confidentiality of information held by the organization, including specifically, “personal information.”

### **Breach Reporting**

A loss of, unauthorized access to or unauthorized disclosure of personal information may result from a breach of an organization’s security safeguards or from a failure to establish those safeguards. In the case of a “breach of security safeguards” involving your personal information under our control, we will notify regulatory authorities as appropriate, where it is reasonable in the circumstances to believe that the breach creates a real risk of physical, financial or reputational harm to you. We may provide notification to other organizations or government institutions that can reduce the risk or mitigate the harm from the breach. Breaches will be recorded and kept in accordance with applicable law.

### **Principle 8 – Openness**

Shad Canada will make specific information about its personal information management policies and practices readily available to any member of the general public.

### **Principle 9 – Access and Correction**

Upon request, Shad Canada will inform individuals of the existence, use and disclosure of their personal information and provide reasonable access to that information. An individual shall be able to verify the accuracy and completeness of their information, and may request that it be amended, as appropriate.

If Shad Canada is made aware that personal information is inaccurate, incomplete or out of date, we will revise the personal information.





Requests for access to personal information collected will be fulfilled within 30 days. Responses to inquiries or complaints will be handled as soon as reasonably possible. We may require sufficient information to validate the identity of the person making the request and to confirm the person is authorized to make the request, in order to guard against fraudulent requests for access.

## **Principle 10 – Handling Complaints and Suggestions**

Shad Canada has a whistleblower policy to receive and respond to complaints or inquiries about policies and practices relating to the handling of personal information

### **6. Your choices**

Your choices may include:

- **Cookies Settings and Preferences:** Cookies and tracking technologies may be disabled through browser settings. These actions will not prevent us from transacting with you, although it may negatively impact the user experience. You may also visit: <http://youradchoices.ca/choices>.
- **Marketing e-mails:** You may sign up for our mailing lists in order to receive notifications of when the application process opens and other relevant updates regarding the application process. You may unsubscribe at any time by contacting [info@shad.ca](mailto:info@shad.ca)
- **Opt-outs:** You may contact us at [info@shad.ca](mailto:info@shad.ca) to opt out of the use and disclosure of your personal information.

### **7. Use of the Internet and Links to other websites**

Complete confidentiality and security is not yet possible over the Internet. Internet use and communication is subject to interception, loss and alteration. On whichever site you provide personal information, it is possible for a third party to view that information. It is not surprising, for example, that messages to newsgroups have resulted in unsolicited email from spammers. You acknowledge and agree that Shad Canada shall not be responsible for any damages you may suffer as a result of the transmission of confidential or sensitive information over the Internet, and that all such communications will be at your own risk. Shad Canada has no control over other, third-party websites. Shad Canada may provide links to or automatically produce search results for, third-party websites or resources for the users' information.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged into that website. In such cases, you are no longer protected by our Privacy Policy and we encourage you to read the privacy statements or other disclaimers of such other third-party websites. Shad Canada is not responsible for the privacy or security practices or the content of external websites, services or products.





## **8. Contact Us**

We hope you find this statement informative and clear. Please contact our Privacy Officer, Jackie Hatherly-Martin, VP, Finance and Resources by email at [privacy@shad.ca](mailto:privacy@shad.ca) or at (519) 884-8844 x 232 with any questions or requests for further information. Or, if you prefer, contact us in writing, at:

Shad Canada  
c/o Privacy Officer  
419-A Phillip Street  
Waterloo ON N2L 3X2  
Canada

Individuals can also contact the applicable Privacy Commissioner.

## **9. Updates**

Shad Canada reserves the right to update and amend this policy as it is deemed necessary or appropriate to do so. Please check back often to be apprised of any changes. This version was updated on October 23, 2020.