



Universities Canada

Privacy Policy

Universities Canada is committed to fair information practices in relation to individuals whose information it collects, uses, discloses and retains in the course of its operations. Personal information management practices by Universities Canada will be consistent with the fair information principles in the Canadian Standards Association Model Code on the Protection of Personal Information. Where applicable, Universities Canada will comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation.

This policy applies to the business functions of Universities Canada, University Affairs and Scholarship Partners Canada. Websites published by Universities Canada include:

www.univcan.ca
www.universityaffairs.ca
www.affairesuniversitaires.ca
www.universitystudy.ca
www.etudesuniversitaires.ca
www.universityworks.ca
www.luniversitecamarche.ca
portal.univcan.ca
portail.univcan.ca
portal.scholarshippartners.ca

This Privacy Policy does not apply to personal information about employees, former employees and potential employees (all referred to as “employees”) of Universities Canada.

Accountability

Universities Canada is responsible for all personal information under its control, including personal information disclosed to third parties for processing.



Universities Canada has appointed a Privacy Officer who is accountable for the organization's compliance with this Policy. Other individuals within Universities Canada may be responsible for the day to day collection and processing of personal information and may be delegated to act on behalf of the Universities Canada Privacy Officer, where appropriate. The identity of the individuals designated by Universities Canada to oversee compliance with this Policy will be made known internally and will be made available externally on request.

Identifying the purposes for collection of personal information

Universities Canada will clearly identify the purposes for which personal information is collected, used, disclosed and retained at or before the time the information is collected.

Universities Canada will collect, use, disclose and retain personal information for the following purposes:

- to ensure efficient operations and communications with members and other stakeholders;
- for the purpose of data collection and research on higher-education topics;
- to subscribe to e-mail alerts regarding career advertisements and upcoming issues of the University Affairs magazine;
- to subscribe online to receive the University Affairs magazine;
- to voluntarily register individuals online for events organized by Universities Canada;
- to voluntarily provide information on our scholarship listing tool;
- to process and evaluate scholarship applications, select scholarship recipients and administer scholarship payments once awarded and to assess the efficacy of scholarship programs;
- to develop aggregate information and statistics in relation to scholarship programs;
- to maintain a scholarship program alumni contact, a scholarship client list, and to administer subscriptions to University Affairs;
- to market University Affairs' publications to potential purchasers or subscribers;
- to identify and offer information services and products to meet University Affairs' subscriber needs or preferences;
- to audit University Affairs' readership levels;
- to provide and administer payroll and benefits services to other associations and employers in the higher education sector;
- to comply with legal requirements;
- to subscribe to receive Universities Canada e-newsletter on higher education;
- to respond to inquiries received by email, telephone or by the Universities Canada websites;
- to market publications of interest to the higher education sector.

If Universities Canada proposes to use, disclose or retain personal information for a purpose not previously identified, the new purpose will be identified and documented prior to the new use. Unless permitted by law, the consent of the individual will be obtained before the information can be used, disclosed or retained for that purpose.



Consent

Universities Canada will obtain the consent of individuals before or when it collects, uses, discloses or retains personal information, except where authorized by law.

In obtaining consent, Universities Canada will identify the purposes for which personal information will be used, disclosed and retained. Purposes will be stated in a manner that can be reasonably understood by the individual.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may result in the removal of the individual from the program or service. Individuals may opt-out or refuse to consent to the use, disclosure or retention of their personal information for marketing purposes by contacting Universities Canada at 613-563-1236 or by writing to **Privacy Officer, Universities Canada, 1710 – 350 Albert Street, Ottawa, Ontario K1R 1B1**.

Limiting collection of personal information

Universities Canada shall limit the collection of personal information to that which is necessary for the purposes identified. Universities Canada will collect personal information by fair and lawful means.

Universities Canada collects personal information primarily from individuals directly. Universities Canada may also collect personal information from other sources including:

- publishers, list brokers or other associations;
- scholarship administration services clients;
- authorized representatives of employers using Universities Canada payroll and benefit services who represent that they have the right to disclose the information;
- Universities Canada may collect personal information about an individual's family members or beneficiaries from that individual for purposes of providing benefits administration services to the individual, employer, and will in such circumstances rely on the individual to obtain the consent of these other parties.

Universities Canada uses cookies to collect information anonymously and track user patterns on our websites. Cookies contain a unique identification number that identifies your browser, but not you, each time you visit one of our websites. Cookies tell us which pages of our websites are visited and by how many people. They also allow us to save your settings and preferences for future visits, enabling you to customize your experience of our websites. Information gathered through the use of cookies is not related to any personally identifiable details. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on our websites.

Universities Canada also uses analytics to measure the number of visitors to our sites and its various sections and to help make our sites more useful to visitors. This information is not associated with any personal information and may include:



- Domain for your Internet service provider (for example, bell.ca, if you are using a Bell account) from which you accessed the Internet;
- Anonymized IP address (an IP or internet protocol address is a number that is automatically assigned to a device connected to the web. By implementing IP anonymization, Google Analytics does not store nor process complete IP addresses.);
- Type of operating system you are using (ex: Windows or Mac);
- Type of browser you used when visiting the site (ex: Chrome or Firefox);
- Date and time of your visit;
- Pages you visited and time spent on page;
- Address of the website that connected you to our websites (such as google.com or bing.com);
- Device type (desktop computer, tablet, or type of mobile device);
- Browser language.

Data collected for web analytics purposes may be processed in any country where Google operates servers, and thus may be subject to the governing legislation of that country.

Limiting use, disclosure and retention of personal information

Universities Canada will not use, disclose or retain personal information for purposes other than those for which it was collected, except with the consent of the individual, or as required or authorized by law. Personal information will be retained only as long as necessary for the fulfilment of those purposes.

Universities Canada may disclose personal information about an individual to the following:

- a person who, on the basis of a written authorization from a scholarship applicant or recipient, is seeking the information as an agent of the applicant or recipient;
- members of a scholarship selection committee, responsible for selecting scholarship recipients;
- the employers using Universities Canada payroll and benefit services in relation to their employees;
- third party data processors;
- third parties for marketing or readership audit purposes.

Universities Canada has a records retention policy that specifies the length of time that records are maintained. All personal information is accessible only by Universities Canada's personnel, or service providers, who need access to that information for the performance of their duties or services.

Accuracy

Universities Canada will make every effort to maintain the accuracy of the Personal Information in their possession. Universities Canada will rely on the individual to provide accurate Personal Information so as to minimize the possibility that inaccurate Personal Information may be used to make a decision.



Universities Canada will on request correct inaccuracies in Personal Information during the period of its retention. Where notification of such inaccuracies is received, Universities Canada will communicate them to any third parties to whom this information has been disclosed for correction purposes.

Safeguards

Universities Canada will protect personal information with security safeguards appropriate to the sensitivity of the information.

Universities Canada will protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held and will restrict internal access to personnel who require such access to perform their duties.

Universities Canada will protect personal information transferred to third parties providing services to Universities Canada through contractual measures or other arrangements stipulating the confidentiality of the information, restricting the purposes for which the information is to be used and prohibiting its disclosure to third parties upon direction from Universities Canada in accordance with this Privacy Policy.

In the event of a suspected security breach, Universities Canada's staff will immediately undertake an investigation to assess the severity of the breach, including an assessment of which information may have been compromised. Should a security breach be confirmed, Universities Canada will ensure prompt response and appropriate notification to all potentially affected Users, the Sponsors of those programs and the Privacy Commissioner of Canada as soon as feasibly possible. Where applicable laws, such as the General Data Protection Regulation (GDPR), contain addition requirements (e.g. notification within 72 hours), Universities Canada shall ensure compliance with those laws. Universities Canada will then review the incident and ensure appropriate action is taken to prevent future breaches.

Openness

Universities Canada will make readily available information about its policies and procedures with respect to the management of personal information. Individuals will be able to acquire information about our policies and procedures at minimal or no cost and without unreasonable effort. This information will be made available in a form that is generally understandable.

Access to personal information

On written request, and subject to the exemptions stipulated by law, Universities Canada will inform individuals of the existence, use, disclosure and retention of their personal information and provide access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended where inaccuracies exist. When appropriate, the amended information will be transmitted to any third parties having access to the information in question.



Challenging compliance

An individual will be able to address a challenge concerning compliance by Universities Canada with this Policy to the Privacy Officer. Universities Canada will investigate all complaints within 30 days of receipt. If a complaint is found to be justified, Universities Canada will take appropriate measures, including amending its policies and procedures if necessary.

Individuals can obtain more information on Universities Canada's privacy practices, or make a complaint, by contacting:

Privacy Officer
Universities Canada
1710 – 350 Albert Street
Ottawa, Ontario K1R 1B1
Phone: 613-563-1236
E-mail: privacy@univcan.ca

Individuals also have recourse to the Office of the Privacy Commissioner of Canada if they consider that Universities Canada has not responded satisfactorily to their complaint or inquiry.

Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec K1A 1H3
Phone: 819-994-5444
Toll-free: 1-800-282-1376
Website: <https://www.priv.gc.ca/en/>