

# Privacy Policy on the Protection of Personal Information

This policy of Canadian Policy Research Networks applies to individuals accessing our website. It pertains to the protection of personal information, that is, information that relates to an identifiable individual.

By using this website, you signify your consent to and agreement to be bound by these terms, practices and policy.

## 1. Why we collect personal information

CPRN collects, holds, uses and communicates certain personal information pertaining to you for the following purposes:

- managing your subscriptions to email news services, discussion lists, newsletters and other services which CPRN may provide from time to time;
- managing invoicing and accounting services relating to your transactions with us;
- managing and co-ordinating any comments you may have submitted to us and our responses to your comments;
- complying with legal and regulatory requirements.

The personal information collected by CPRN is used exclusively for the purposes listed above and for no other purpose. Moreover, CPRN will collect only the personal information that is strictly necessary for the authorized purposes.

From time to time, CPRN may update the purposes for which it collects, holds, uses and communicates personal information, in which case you will be notified accordingly so that you may agree to such modification.

#### 2. Your wishes will be respected

CPRN does not collect, hold, use or communicate personal information concerning you unless you have given your manifest, free and enlightened consent thereto for the purposes specified by CPRN. Every time any change is made to any of the specific purposes for which personal information is collected, held, used or communicated, we will ask you to consent to such change.

CPRN does not sell personal information to anyone for any purpose, nor does it make its subscriber lists available to others for a fee or on any other basis. You may at any time request that we delete any record with your personal information.

## 3. We collect and use what is needed and nothing else

CPRN will collect only such information as is strictly necessary for the authorized purposes. The nature of the information collected will be such as to allow CPRN to achieve the purposes authorized in connection with its activities.

In relation to subscriptions to *e-network*, only an e-mail address is requested, but you may include your country, province (or state), city, and type of work on an optional basis to provide CPRN with additional information about its website visitors. For *NetworkNews*, a first name, last name, title, organization, street address, city, province (or state), postal (or zip) code, country, work phone, fax number, e-mail and URL are requested.

In order to respond to any communication from CPRN website users, a name, e-mail address, phone number and fax number are required.

Thereafter, it is understood that such personal information will be used or communicated for the authorized purposes only; it will be disclosed to third parties only where we have your consent to such disclosure, where required or permitted by law.

We will retain personal information concerning you only as long as is necessary for the authorized purposes. Thereafter, the information will be destroyed, erased or depersonalized. The retention of certain personal information held by CPRN may be subject to statutory or regulatory provisions requiring the information to be retained for periods that differ from the retention period for which CPRN requires it, in which case the longer period will apply.

CPRN may also collect or communicate certain personal information without your consent, but will only do so to the extent permitted by law or where such information is required by a court or by persons authorized to compel its disclosure.

We may be required to supply certain personal information held by us should we receive an order, search warrant or other demand emanating from a legal authority. CPRN will ensure that such orders, warrants or demands are valid and will disclose only the personal information that is required by law.

# 4. Accuracy

CPRN undertakes to ensure that all personal information relating to you is accurate, complete and up-to-date. Having information that is accurate, complete and up-to-date allows us to make appropriate decisions based on that information and thus offer the best possible service to you. CPRN will update the personal information held by it having regard to the purposes for which the information is used. You are urged to ensure that your personal information is accurate by informing CPRN of any change in the personal information held. You are also encouraged to bring to CPRN's attention any error affecting the personal information held, which error will be immediately conveyed to all persons having received communication of the information.

## 5. Security measures

CPRN undertakes to ensure that the personal information held by it is protected by means of adequate physical, administrative and technical safeguards (including server firewall protection), and in particular to protect the information against loss, theft and unauthorized consultation, communication, copying, use or alteration. The protection methods authorized by CPRN will apply irrespective of whether the information is stored on paper, electronically or using any other medium. Only authorized personnel of CPRN who require the information for the performance of their duties will have access to personal information and such access will be limited to information that is strictly necessary for the performance of those duties.

CPRN will periodically update its policies with regard to the security measures that are to be taken in order to ensure that the personal information held by it is protected in the most effective manner possible.

## 6. Transparency and access to personal information

The public may have access to CPRN's policies on the protection of personal information. Requests for access to personal information held by CPRN concerning you should be directed in writing to CPRN's Chief Privacy Officer at <a href="mailto:privacyofficer@cprn.org">privacyofficer@cprn.org</a> or at CPRN, 214-151 Slater St. Ottawa, Ontario, Canada, K1P 5H3. Access to personal information will not be available over the phone.

We will assist you in identifying the personal information concerning you and in completing the request for access. You will be informed in advance of any charges that apply in connection with the request for access. Such charges may relate to the transcription, reproduction or transmission of personal information held by CPRN. We will respond to your request for access within thirty (30) days. If, for reasons beyond our control, a longer response time should be required, you will be advised accordingly.

In certain very specific cases, CPRN may not be able to supply personal information held concerning you for reasons of a legal nature, which may have to do with information being the subject of a privileged communication between professional and client, with pending judicial proceedings or with the protection of third-party privacy. In all such cases, we will convey in writing the reasons why your request for access has not been granted by CPRN.

#### 7. Complaint process

If you wish to submit comments or inquiries concerning this policy, or if you are not completely satisfied with its application by CPRN, you may convey your concerns or suggestions to CPRN's Chief Privacy Officer at <a href="mailto:privacyofficer@cprn.org">privacyofficer@cprn.org</a>. CPRN will reply to you as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address your concerns or to implement your suggestions.