

Privacy Policy

Board Policy

Last Reviewed: September 10, 2019

Epilepsy Toronto (“we”, “our”, “us”) is committed to respecting your privacy and protecting your personal information and we are accountable to fulfill this commitment. We recognize the importance of your right to privacy and want you to be familiar with how we collect, use and disclose any personal information that individually identifies you (e.g. name, phone number, email address).

Epilepsy Toronto follows the requirements under Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA), and is governed by the Canadian Anti-Spam Legislation (CASL). We also adhere to applicable service delivery practices required for Epilepsy Toronto programs that receive government funding.

This Privacy Policy explains how we collect, use, disclose and protect your personal information when you use our website (the “Site”) and our programs and services (the “Services”). This Privacy Policy outlines the terms and conditions you agree to when using our Site and Services. We will only collect, use and disclose your personal information in accordance with this Privacy Policy.

By using our Services and Site and supplying your personal information, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, disclosure and other processing of your personal information as outlined in this Privacy Policy.

What Personal Information Do We Collect?

Personal information means any information about an identifiable individual. Anonymous Data means data that is not associated with or linked to any individual’s personal information or will not easily permit the identification of individuals. EPILEPSY TORONTO does not consider personal information to include Anonymous Data.

The types of personal information that we may collect include, but are not limited to:

- your name;
- your title;

- your address;
- your phone number;
- your email address; and
- personal information you give us that we did not request (such as personal information you voluntarily put into an email to us).

Purposes for Collecting Your Personal Information

We collect, use and disclose your personal information in order to provide you with our Services. We also collect, use and disclose your personal information to comply with legal and regulatory requirements and as otherwise may be permitted or required by applicable laws. We will only use the personal information that we collect for the purposes for which it was collected.

Specifically, we collect your personal information for the following purposes:

- to provide you with our Services as requested by you;
- to establish and maintain responsible relationships with our participants, members, donors, parents/guardians, staff and volunteers;
- to manage, develop and enhance EPILEPSY TORONTO operations, programs and services;
- to acknowledge gifts, issue tax receipts, and other administrative requirements including information requests;
- to process and collect fees for service;
- to assess participant needs;
- to conduct participant satisfaction research;
- to determine program, service, employment or volunteer eligibility;
- to provide safe and secure EPILEPSY TORONTO environments;
- to share impact stories of our participants, members, donors, parents/ guardians, staff and volunteers;
- to collect data for statistical purposes;
- for administration, management, strategic planning, decision-making, research, and allocating of resources within EPILEPSY TORONTO;
- for fundraising and advertising;
- to respond to your questions that you send by email or through our Site;
- subject to applicable law, to provide you with newsletters and articles to notify you about other programs and services provided by EPILEPSY TORONTO, which may be of interest to you;
- to customize the appearance of the Site and Services displayed to you;

- to obtain your feedback regarding our Services, including through surveys;
- to improve the Site and help us develop new services, apps, tools and Site features; and
- to meet any legal or regulatory requirements.

When Do We Collect Personal Information?

We may collect your personal information when you voluntarily provide it to us by using our Site or Services.

For example, we may ask you to provide personal information if you:

- use our Site or our Services;
- make a donation through our Site or otherwise;
- register, update, create or sign in to an account on our Site and our Services;
- send us a question or comment by email, social media or phone;
- post comments or other content on our Site or Services;
- register to receive newsletters, articles and updates about our Services; and
- otherwise participate in features of our Site or our Services that ask for personal information.

In the case of donations, personal information is collected to facilitate the recording of your gift. Our on-line donation processing is secure.

Any personal information posted, used or disclosed on a Facebook page, Twitter page, LinkedIn page, Instagram page, YouTube page or other social networking page or site is subject to that website's privacy policy, and is not subject to this Privacy Policy.

Limiting Collection of Personal Information

We limit the collection of personal information to that which is necessary to fulfill the purposes identified in this Privacy Policy and we collect, use and disclose your personal information in accordance with this Privacy Policy.

As much as possible, staff and volunteers will collect personal information directly from you. Personal information may be collected from other sources with your prior consent.

Use, Disclosure and Retention of Personal Information

Your personal information will not be used without your consent for purposes other than those for which it was collected or in accordance with applicable laws. From time to time, we may wish to use personal information for new or additional purposes, in which case we will amend

the Privacy Policy to include these new or additional purposes and will obtain your consent through your continued use of our Site and Services.

To help safeguard your privacy, we will consider using non-identifiable information, such as coded or Anonymous Data that does not identify you whenever possible. We may generate Anonymous Data from personal information collected through the Site and Services by removing information that makes the data personally identifiable to an individual. We may use this Anonymous Data and aggregated data for any reasonable purpose and disclose such data to third parties in our sole discretion.

We may use and disclose your personal information to service providers, data processors and other third parties ("*Third Parties*") under the following limited circumstances:

- to service providers that help with our operations, Site and Services including, without limitation, for customer services, monitoring and analyzing Site activity, and operating and maintaining the Site. Such service providers and partner companies may only use your personal information for the purposes described in this Privacy Policy;
- when necessary to protect our safety, property or other rights, our representatives, customers and users of the Site, including to detect and prevent fraud;
- if we sell or transfer all or a portion of our business or assets to a related company or a third party;
- with your consent; or
- when otherwise required or permitted by law.

In certain circumstances, personal information can be collected, used or disclosed without your consent. For instance, EPILEPSY TORONTO may disclose personal information without your prior knowledge or consent:

- to a lawyer or other legal representative of EPILEPSY TORONTO;
- to a government body or agency in certain circumstances;
- to collect a debt, or comply with a subpoena, warrant or other court order; or
- in circumstances otherwise required or permitted by law.

We retain your personal information only for as long as we need it to fulfill the purposes for which it was collected (including as required by contract with a funding partner) or as required by law.

EPILEPSY TORONTO will maintain schedules for records retention and destruction, which apply to personal information that is no longer necessary or relevant for the identified purposes for collection, or required to be retained by law or under contract. Such information shall be securely destroyed, erased or rendered anonymous.

Links to Other Sites

Our Site may contain links to other sites that are independently owned and operated by third parties. These other sites may have their own privacy policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any sites owned and operated by any third parties. Other sites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy of each site you visit.

Third Party Analytics

Our Site uses third party analytics services such as Google Analytics, a web analytics service of Google, Inc. ("*Google*").

Google Analytics uses "cookies" to analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) is sent to a Google server in the U.S. and stored there. Google will use this information to evaluate your use of our Site, compile reports on Site activity for our Site operators and to provide other site activity related internet services. Additionally, Google may transfer this information to a third party when required by law or in the case of a third-party processing information on Google's behalf. In no case will Google use your IP address in connection with any other information held by Google.

You can set your internet browser to prohibit the installation of cookies, although we must point out that some features and functions of our Site will then be unusable. By using our Site, you consent to the processing of data about you collected by Google in the manner described and for the above mentioned purpose. The consent for collection and storage of data can be withdrawn at any time in the future by clicking on the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>. Given the debate concerning the use of analytical tools using full IP addresses, we wish to point out that our Site uses the "Anonymize IP" function of Google Analytics which works with a shortened form of IP addresses to avoid direct personal identification.

Furthermore, we use the cookies to carry out frequency assessments, page usage assessments and marketing assessments. For the aforementioned assessments, we utilize this cookie information without a link to your personal information, so it is completely anonymous.

Security

All staff and volunteers with access to information are required, as a condition of employment or volunteer role, to respect the confidentiality of personal information and protect personal information in their control (regardless of format) against such risks as loss or theft, or unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards.

Safeguards may include physical measures (such as locked doors or locked file cabinets), organizational measures (such as staff training, limited access and security clearances) and technological measures (such as passwords and anti-virus software for computer systems).

Any personal information that you provide to us through our Site is stored on a secure server. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we are committed to protecting your personal information, we cannot ensure or warrant the security of any information you provide to us.

Personal information shared with a third party for processing shall be protected through contractual agreements with requirements for confidentiality and appropriate safeguards.

Payment Information

We use commercially reasonable efforts to select an appropriate company to maintain the confidentiality and security of your payment information. When you make a donation on our Site, you will be directed to a third party provider website which will collect payment information directly from you, such as your credit card numbers and expiration dates, and any other personal information necessary to process your payment ("*Payment Information*"). EPILEPSY TORONTO and third party provider will send emails to you regarding the processing of your online payment.

Individual Access and Accuracy of Personal Information

You may request access to your personal information which we may hold by contacting us at the contact information set forth below, and we will respond within the time periods provided for under applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for such access request unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so. You may request to update and change your personal information at the contact information set forth below. We shall endeavor to correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information shall be transmitted to third parties having access to such information. A statement of disagreement will be attached to records where a requested amendment cannot be made..

Children's Privacy

We are committed to protecting the privacy of children and we do not knowingly solicit personal information from children under the age of 13. If a child has already provided us with personal information, his or her parent or guardian may contact us for the purpose of deleting this information.

Electronic Communications

We comply with Canada's anti-spam legislation (CASL) and we will not send you electronic communications in contravention of this law. As part of signing up to receive our Services, you may have also opted in to receive email communications from us. If you opted-in to receive such communications, we may use the information to communicate with you regarding our Services, provide you with other information that you request, and/or improve our service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our email or other communications at any time and we will ensure that our emails include instructions on how to unsubscribe if you no longer wish to receive future emails from us. We provide an on-going opportunity to unsubscribe or opt-out of contact by us by accessing our Site or by email to info@epilepsytoronto.org or by calling Epilepsy Toronto Office.

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to our Privacy Policy; or (iii) to receive Service related messages.

User Content in Comments, Chat Rooms and Message Boards

If you post comments on the Site (such as commenting on a blog post) that may be available on our Site from time to time, you should know that when you voluntarily disclose your personal information on our comment boxes or other interactive areas where personal information can be posted, the information can be collected and used by other internet users. This may result in unsolicited messages from other posters or parties. We undertake no obligations as to the security of information you voluntarily post in comment sections of our Site or in other interactive features of our Site. Please refer to our Terms of Use to understand your obligations when providing your own content (referred to as “User Content” in our Terms of Use).

Terms and Conditions

Our Site is owned by EPILEPSY TORONTO. Any images, graphics, multimedia or content is copyrighted by EPILEPSY TORONTO and may only be used in the manner provided for in the terms and conditions outlined throughout this Privacy Policy. In addition, our Site contains names, logos, trademarks, service marks and other intellectual property which are the property of EPILEPSY TORONTO and may not be used for any purpose without the express written consent of EPILEPSY TORONTO. We will permit you to download or photocopy material displayed on our Site for your non-commercial personal use. However, any content or graphics extracted must prominently display copyright and other proprietary notices.

Changes to this Privacy Policy

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes to this Privacy Policy. We will post the most current version on our Site and we will indicate the date this Privacy Policy was last revised at the top of the page. Your continued access or use of this Site after any such changes constitutes your acceptance of the Privacy Policy as revised.

Your Consent to the Terms of this Privacy Policy

By using our Services and providing us with your personal information, you agree that we may collect your personal information and you voluntarily consent to the collection, use, disclosure and transfer of your personal information in accordance with this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use our Site or our Services or provide

us with any personal information. If you do not understand the nature, purpose and consequences of us collecting, using and disclosing your personal information, please do not use our Site or our Services or provide us with any personal information, and contact us at the contact information set forth below so that we can address your questions or concerns.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting us at the contact information set forth below. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

How to Contact Us

We welcome your feedback. If you have questions, comments or concerns about this Privacy Policy, or would like to do any of the following:

- see your personal information that you have already sent us so that you can correct, update or delete it from our files;
- if your child under 13 has used this Site and sent us personal information, delete that personal information from our files;
- ask that we not send you electronic communications or otherwise contact you; or
- report any violation of this Privacy Policy,

you may speak to our staff and volunteers by contacting us by phone, fax or email:

EPILEPSY TORONTO

Email: info@epilepsytoronto.org

Phone: 416-964-9095

Fax: 416-964-2492

If your concern or complaint is not resolved to your satisfaction, you can contact our Executive Director, our designated Privacy Officer, who will investigate your concern and try to resolve it.

You will be asked to provide the following information, in writing:

- your name;
- an address, email, phone number or fax number where we can reach you;
- the nature of your complaint, including relevant details and what you would like EPILEPSY TORONTO to do; and

- the name of any EPILEPSY TORONTO staff or volunteers with whom you have already discussed the issue.

We will endeavour to get back to you promptly.