



INSTITUTE FOR CANADIAN CITIZENSHIP

PRIVACY POLICY

(Last Updated: April, 2012)

The Institute for Canadian Citizenship, its successors and assigns (collectively “ICC”) are concerned about the protection of personal information, and this is reflected in how ICC conducts itself, its programs (the “Programs”), its events such as its annual symposium (the “Events”) and its website (the “Web Site”).

In this policy, ICC describes: (i) how ICC collects personal information; (ii) the types of personal information that ICC collects; (iii) how that personal information may be used; (iv) how that personal information will be safeguarded; and (v) when and to whom that personal information may be disclosed. ICC recognizes privacy and security as being concerns for most individuals.

1. COMPLIANCE WITH LAWS

Please note that ICC complies with the federal and provincial laws relating to the protection of personal information that apply in the Province of Ontario, Canada. You can find out more about these laws by visiting the following web sites:

- the web site of the Privacy Commissioner of Canada located at www.priv.gc.ca; and
- the web site of the Information and Privacy Commissioner for the Province of Ontario located at www.ipc.on.ca.

2. WHO IS A PARTICIPANT OR A PAST PARTICIPANT?

A “Participant” is an individual who is registered in one of ICC’s Programs or registered to attend a current or upcoming Event. A “Past Participant” is an individual who has been Participant, but is no longer a Participant.

3. WHO IS A USER?

A “User” is an individual who uses the Web Site (as a casual visitor, Participant or otherwise).

4. WHAT PERSONAL INFORMATION IS COLLECTED BY ICC AND FOR WHAT PURPOSES IS IT USED?

4.1 Operating Programs

When an individual wishes to register in a Program, ICC may ask the individual for his or her:

- contact information including his or her full name, address, telephone number(s) and e-mail address;
- date of birth (day, month and year);
- date on which he or she became a citizen (day, month and year);
- location of his or her citizenship ceremony; and
- preferred language of communication.

ICC may also ask the individual for his or her username suggestions and password suggestions (which in the individual’s discretion, may or may not include personal information) and for further information the provision of which is not required in order to register in the Program.

The information described in this section 4.1 is used by ICC for: (i) checking the individual’s eligibility for the Program; (ii) checking the individual’s eligibility for other Programs and making the individual aware of them; (iii) checking if the individual is already a Participant (in order to avoid creating duplicate records or making the individual aware of a Program in which he or she is already a Participant); (iv) administering and operating the Program; (v) better tailoring the individual’s experience relating to the Program to the individual; and (vi) other purposes reasonably ancillary to those purposes.

It is a feature of certain Programs (such as the Cultural Access Pass Program) to automatically register Participants in an alumni Program when they are no longer eligible for the initial Program. If automatic

registration in an alumni Program is a feature of a Program: (i) the feature will be clearly set out when an individual registers for the Program and in the FAQs for the Program; and (ii) any information provided to ICC in connection with the initial Program is also being provided in respect of the alumni Program.

As well, during the two year period after a Participant becomes a Past Participant, the Past Participant's information described in this section 4.1 is used by ICC as follows: (i) to inform the Past Participant of Programs for which he or she is eligible; and (ii) for requesting donations.

PLEASE NOTE: ICC aggregates and depersonalizes this information. ICC uses the aggregated and depersonalised information to: (i) better understand how the Programs are being used in order to improve upon the Programs and develop new Programs; (ii) apply for funding or sponsorship for any Program; (iii) report on the effectiveness of any Program to those who fund or sponsor it; and (iv) support its research efforts described in section 4.4.

4.2 Holding Events

When an individual wishes to register for an Event, ICC asks the individual for his or her:

- contact information including his or her full name, address, telephone number(s) and e-mail address;
- whether or not he or she is a Participant; and
- if the Event is one for which there is a charge to attend, payment information.

ICC may also ask the individual for further information the provision of which is not required to register for the Event.

The information described in this section 4.2 is used by ICC for: (i) registering the individual for the Event; (ii) checking if the individual is already a Participant (in order to avoid creating duplicate records); (iii) administering and operating the Event; (iv) better tailoring the individual's experience relating to the Event to the individual; and (v) other purposes reasonably ancillary to those purposes.

As well, during the two year period after a Participant becomes a Past Participant, the Past Participant's information described in this section 4.1 is used by ICC as follows: (i) to inform the Past Participant of Events; and (ii) for requesting donations.

PLEASE NOTE: ICC aggregates and depersonalizes this information other than payment information. ICC uses the aggregated and depersonalised information to: (i) better understand how Participants participate in Events in order to plan future Events and Programs; (ii) apply for sponsorship and/or funding for any Event; and (iii) report on the effectiveness of any Event to those who sponsor and/or fund it; and (iv) support its research efforts described in section 4.4.

4.3 Operating the Web Site

(a) Browsing

ICC may collect the following types of personal information relating to all Users:

- the IP address from which the individual is accessing the Web Site;
- location data based on the IP address;
- which pages were accessed and for how long they were accessed; and
- data relating to how individuals interact with the Web Site (for example, the amount of time spent on a certain page).

By using the Web Site, you consent to the collection and use of this information by ICC and its use in aggregated form by ICC for the following purposes and for other purposes reasonably ancillary to them:

- to better understand how the Web Site is being used in order to improve upon the Web Site and other Web Sites; and
- to tailor how an individual experiences the Web Site.

PLEASE NOTE: ICC aggregates and depersonalizes this information. ICC uses the aggregated and depersonalised information to: (i) better understand how the Web Site is being used in order to improve upon the Web Site; (ii) better understand the extent to which content relating to any Program or Event that is posted to the Web Site is being used in order to improve upon ICC's Programs and Events; (iii) apply for funding and/or sponsorship for the Programs and Events; (iv) report on the role of the Web Site plays in operating or drawing attention to ICC's Programs and Events to those who sponsor or provide funding to ICC; and (v) support research efforts described in section 4.4.

(b) Web-based Services

When a Participant chooses to participate in activities or use services offered by ICC via the Web Site, ICC collects any personal information necessary for the activity and identified as being collected at the time. ICC may also ask the Participant for further information the provision of which is not required to participate in the activity or use the service. The Participant is not required to provide this information.

The information described in this section 4.3(b) is used by ICC for: (i) checking if the individual is a Participant; (ii) administering and operating the activity or service; (iii) better tailoring the individual's experience with the activity or service to the individual; and (vi) other purposes reasonably ancillary to those purposes.

PLEASE NOTE: ICC aggregates and depersonalizes this information. ICC uses the aggregated and depersonalised information to: (i) better understand how the Web Site is being used in order to improve upon the Web Site; (ii) better understand the extent to which content relating to any Program or Event that is posted to the Web Site is being used in order to improve upon ICC's Programs and Events; (iii) apply for funding and/or sponsorship for the Programs and Events; (iv) report on the role of the Web Site plays in operating or drawing attention to ICC's Programs and Events to those who sponsor or provide funding to ICC; and (v) support its research efforts described in section 4.4.

(c) Other

As well, the Web Site provides Users with opportunities to "opt in" to receive from ICC additional information, announcements or special offers in addition to those that are part of any Program or Event. If an individual opts to receive additional information or announcements from ICC, the personal information that he or she provides to ICC may be used to: (i) provide the additional information and announcements; and (ii) tailor the types of information and announcements provided by ICC to the individual. Additionally, an individual who has previously opted to receive additional information and announcements may subsequently "opt out" by following the directions for doing so on the Web Site.

(d) Cookies, web beacons and request headers

When a User accesses the Web Site, ICC's server may attach a small text file to the User's hard drive – a cookie. The cookie is used to identify the individual whenever he or she returns to the Web Site. The information contained in the cookie is also used to tailor how the User experiences the Web Site. Please note, by changing the settings of their web browsers, Users can prevent cookies from being set or delete them, but this may prevent the Users from participating in certain activities available via the Web Site.

The Web Site may use web beacons (also known as tags, transparent .GIF files and single pixel .GIF files). They are used to better understand how the Web Site is being used in order to improve upon the Web Site.

When a User accesses the Web Site, the User's browser will make certain requests of the Web Site. It is typical for a browser to provide information about itself (for example, type and version number) and its capabilities in the headers of such requests. ICC retains and aggregates this information, and ICC uses it to:

- better understand how the Web Site is being used in order to improve upon the Web Site;
- better understand how Program-related and Event-related content forming part of the Web Site is being used in order to improve upon how Programs and Events make use of the Web Site;
- tailor how an individual experiences the Web Site to the individual; and
- seek sponsors for the Programs and Events and report on the effectiveness of the web-based aspects of the Programs and Events to the sponsors.

4.4 Research

(a) Focus and General Purposes

There is a research component to ICC. ICC conducts research relating to: (i) immigration trends; (ii) the various ways in which new Canadian citizens experience Canada; (iii) the experiences that new Canadian citizens bring to Canada; and (iv) the contributions made by new Canadian citizens to Canada.

ICC conducts research to: (i) measure the effectiveness of its Programs, further develop its existing Programs and develop new Programs; (ii) measure the quality of an Event and develop new Events; (iii) increase public awareness about: (A) the needs and experiences of new Canadian citizens; and (B) the effect of exposing new Canadian citizens to and encouraging them to contribute to Canada's culture; (iv) measure the attitudes and behaviours of new Canadian citizens; and (v) increase public awareness about the contributions made by new Canadian citizens to Canada, especially in respect of Canada's shared and evolving culture.

(b) Surveys

ICC may use Participants' contact information to invite them to participate in surveys. ICC may do so through the Web Site, by email or by other means. When ICC creates an opportunity for individuals to volunteer their information by responding to a survey, ICC will remind individuals of ICC's general purposes for research, disclose any other purposes for which the personal information is being collected and seek consent to use the personal information collected for all such purposes.

From time to time, ICC may cooperate with other researchers on surveys. ICC does so only when the research shares a common focus with ICC's research and one or more common purposes. When ICC creates an opportunity for individuals to volunteer their information on behalf of a third party researcher, ICC will: (i) clearly identify the third party; (ii) clearly identify the purposes for which the information is being collected; and (i) with the third party, seek consent to use the personal information collected for such purposes.

(c) Other Research Opportunities

ICC may use Participants' contact information to invite them to participate in research events other than surveys (for example, discussion forums). Participation in research events is voluntary. Information collected by ICC at such events will be aggregated and depersonalized before being used by ICC for research or shared with any other researcher. ICC will not share the aggregated and depersonalized information with another researcher unless the researcher's research shares a common focus with ICC's research and one or more common purposes.

(d) Aggregated and Depersonalized

PLEASE NOTE: ICC may take information that it has already aggregated and depersonalized for other purposes and combine it with aggregated and depersonalized survey information. Provided that the combined information is still depersonalized, it may be used by ICC for research purposes, and ICC may provide access to that information to other researchers whose research shares a common focus with ICC's research and one or more common purposes.

4.5 Testimonials

ICC may use Participants' contact information to ask them to provide stories and testimonials of how they have benefited from any Program or Event. If ICC wishes to use any such story or testimonial provided

other than to improve upon the Programs and Events, ICC will seek the Participant's express consent to do so.

4.6 Fundraising

ICC may use a Participant's contact information to seek donations to help support ICC's efforts including its Programs and Events.

5. WITH WHOM DOES ICC SHARE MY PERSONAL INFORMATION?

5.1 Generally

ICC may share personal information which it has collected with its directors, officers and employees who need to use that information in connection with one or more of the purposes for which that personal information was collected.

From time to time, ICC may engage service providers to provide certain limited services such as hosting the Web Site or processing financial transactions. ICC will only provide those service providers with the personal information they need to deliver the service for which they were retained. ICC will also require those service providers, through contractual means, to safeguard such information, maintain its confidentiality and not to use that information for any purpose other than providing the services for which they were retained. Please note that such services providers may not be located in Canada.

ICC may access and/or disclose any personal information which it has collected if required or permitted to do so by law (for example, in order to comply with a legal requirement including but not limited to one imposed by a warrant, subpoena, court order or like instrument served on ICC or in urgent circumstances to protect the life, health or security of any person).

ICC may access and/or disclose any personal information which it has collected in order to prevent, take action or defend against or investigate: (i) possible illegal or unlawful activities, fraud or suspected fraud; (ii) violations of the terms of use for the Web Site or the terms applicable to any Program or Event; and (iv) any legal claims involving ICC.

Please be aware that ICC may disclose personal information to its successor or any assignee of: (i) all or substantially all of its assets; or (ii) all of its assets in relation to any Program or Event.

5.2 Participating Cultural Institutions

ICC aggregates and depersonalises survey information. With respect to any cultural institution that has chosen to participate in any Program or Event by making access to itself available to Participants for free or at a discounted rate, ICC may provide the aggregated and depersonalized information relating to Participants' experiences with the cultural institution.

5.3 Other Third Parties

Before disclosing personal information relating to an individual to a third party other than as set out in this policy, ICC will obtain the affected individual's consent to the disclosure.

5.4 Can third parties collect information via the Web Site?

If a User chooses to use a service provided by a third party via the Web Site, the User is entering into a legal relationship with that third party. Any personal information provided by a User in relation to his or her use of that service is being provided to the third party. It is not being provided to ICC, and its use is governed by the third party's policies relating to the protection of personal information, not this Privacy Policy. Please check the third party's privacy policies prior to providing personal information to them.

6. ICC WILL NOT ASK FOR YOUR PASSWORD

If you register for a Program, you may be given a user name and password that allow you to view certain information pertaining to the Program or participate in certain activities online. If you receive any unsolicited message claiming or appearing to come from ICC, any Program or the Web Site that requests password information or userID information, do not respond to it and report it to ICC by forwarding a copy of it to privacy@icc-icc.ca.

7. WHAT ABOUT INFORMATION SECURITY?

ICC uses physical, organizational and technological safeguards to protect personal information in its possession. For example, ICC uses encryption to safeguard certain types of personal information such as passwords when they are being transmitted over the Internet. However, please note that no data transmission over the Internet can be guaranteed to be completely secure. Consequently, ICC expressly disclaims all representations, warranties and conditions (whether express or implied) that any information transmitted to or by ICC over the Internet will be completely secure.

8. INQUIRIES, REQUESTS FOR ACCESS AND SUBMITTING CORRECTIONS

ICC welcomes comments regarding this policy. If any User or the parent or guardian of any User under the age of 13 believes that ICC has not adhered to this policy or would like to request access to or an amendment to his or her personal information or the personal information of his or her child being held by ICC, please contact ICC' Privacy Officer by e-mail sent to the Privacy Officer via the Web Site (i.e. by using the "Contact Us About Privacy" button on the page on which this policy is displayed) or by regular mail sent to the following address:

Institute for Canadian Citizenship
260 Spadina Avenue, Suite 500
Toronto, ON M5T 2E4
Attention: Privacy Officer

Depending on the type and volume of information requested, a fee may apply to processing it.

9. RETENTION AND DESTRUCTION

ICC has set retention schedules for any back-up of the Web Site that it may create as part of the routine operation and administration of the Web Site.

With respect to any personal information supplied to ICC, ICC keeps personal information only for as long as the personal information is required for the purposes for which it was collected and compliance with laws and regulations. Consequently, there is no single retention period applicable to all instances of personal information collected by ICC.

When any personal information is no longer required by ICC for the purposes for which it was collected, ICC destroys the personal information in a manner which takes into account the sensitivity of that information.

10. CHANGES TO THIS POLICY

ICC will occasionally update or change this policy. When ICC makes any change to this policy, an updated copy will be posted to the Web Site and for a period of at least 60 days, the word "updated" will appear next to the link to this policy on: (i) the introductory page of the Web Site; (ii) the log-in page for the Web Site; and (iii) the introductory page for each Program. The date that this policy was last updated will appear at the top of the copy of it posted on the Web Site.

11. CONSENT

11.1 Giving Consent

By enrolling in any Program, registering to attend any Event or using the Website, one is consenting to ICC's collection, use and disclosure of his or her personally identifiable information in accordance with this policy.

11.2 Opting Out of Promotional Emails and Newsletters

If an individual no longer wishes to receive newsletters and promotional communications from ICC, the Individual may opt-out of receiving them by following the instructions included in each newsletter or the User may communicate its wish by emailing ICC at CAP@icc-icc.ca. Please type "UNSUBSCRIBE" in the subject line and set out the affected email address.

11.3 Method for Withdrawing Any Other Consent

If any individual wishes to withdraw any consent (other than one related to newsletters and promotional communications from ICC), he or she may do so by emailing ICC at CAP@icc-icc.ca. Please type "WITHDRAWAL OF CONSENT" in the subject line, and clearly describe the consent being revoked.

Please note that by refusing to provide certain types of personal information or by denying or withdrawing consent to use or disclose personally identifiable information for purposes identified in this policy, an individual may be unable to participate in certain Programs, Events or activities on the Web Site.