

## **PRIVACY POLICY**

Last updated February 2, 2009

### **INTRODUCTION**

This Privacy Policy explains how personal information about you may be collected, used, or disclosed by the Canadian Education and Research Institute for Counselling (“CERIC”), as a consequence of your activities on this Site (the “Site”). We urge you to read it carefully.

At CERIC, we treat your personal information with the utmost respect and in accordance with this Privacy Policy. As further described below, we will NEVER SELL, TRADE, RENT OR LICENSE PERSONAL INFORMATION THAT YOU PROVIDE TO US.

By registering for any of our conferences, by registering as a user of this Site, or by otherwise accessing this Site, you agree to the terms of this Privacy Policy and consent to the policies and practices described for the collection, use or disclosure of personal information.

From time to time CERIC may introduce or modify its products or services and may change this Privacy Policy by notifying you via this Site. You agree to review this Privacy Policy from time to time so that you will be aware of any changes.

### **PROTECTION OF PERSONAL INFORMATION**

Canadian law governs the collection, use and disclosure of personal information in a manner that recognizes individuals’ right of privacy with respect to their personal information.

The federal *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) sets out rules and principles for the management of personal information by commercial organizations. This Privacy Policy adopts the standards required by PIPEDA and applies to all personal information submitted to or collected by CERIC by or through this Site.

The type of personal information that is protected by law includes almost any information about an identifiable individual, such as your name, address, telephone number, age, sex, marital status and nationality. Personal information may not, however, include certain types of business or employment related information. It does not, for example, include the name, title, business address or telephone number of an employee of an organization.

PIPEDA provides certain fundamental principles which apply to the collection, use and disclosure of your personal information. One of the most significant, is that your personal information generally cannot be collected, used or disclosed without your consent. It also allows you to find out why your personal information is being collected, how it is being used, where it’s being stored and to whom it’s disclosed. It requires the use of appropriate safeguards to secure your personal information. It also grants you access to your personal information and provides mechanisms for ensuring compliance.

## **WHAT INFORMATION DO WE COLLECT**

We limit the collection of your personal information to that which is required or permitted by law. We collect such personal information as is required for the purposes identified by us in this Privacy Policy or identified by us at the time that we collect the information from you.

When you register on the Site for a Cannexus conference, or to become a registered user of the Site, you may be requested to supply certain registration information (“Registration Information”), including without limitation your name, email address, occupation, title, mailing address, telephone number, emergency contact information and special dietary or attendance information.

Depending on the selections that you make on our Site, we use your Registration Information to register you for the applicable conference, or to register you as a user of the Site, or both.

We will store your Registration Information in our database to allow us to serve you better with respect to any applicable conference and future visits to the Site. Your Registration Information may also be used by us to contact you about other products or services, such as future conferences, that we or our affiliates offer and that may be of interest to you.

You can visit this Site without telling us who you are and without providing us with any information about yourself. However, certain anonymous information (“Anonymous Information”) may be collected by us automatically. Our Web server may collect the IP address and the name of the Internet service provider (“ISP”) associated with the computer from which you accessed this Site, the type and version of Web browser and operating system that you are using, and the address of the Web Site that you visited prior to this Site. If your Web browser is configured to accept cookies, we may place either temporary cookies (only until you exit your current browser window) or permanent cookies (until you manually disable or delete the cookie using your browser software) on your computer. A "cookie" is a small piece of information that our Web server automatically sends to your browser for storage on your computer, which then permits our Web server to recall information about your preferences as a part of the Anonymous Information. With the exception of the Anonymous Information described above, you will always know when we are collecting information from you and therefore have the opportunity not to provide the information.

The purposes for which we collect any information will always be as set out in this Privacy Policy or as otherwise expressly communicated to you before we collect the information.

## **USE OF INFORMATION**

Registration Information is collected primarily for the purpose of identifying you as a user of this Site and as an attendee of any applicable conference.

Registration Information may also be used to determine appropriate new features, content or services for this Site, to provide advertisers and business partners with aggregate but NOT

personally identifiable information about our customers and their preferences, including statistical information about the source of visitors, sales, traffic patterns and use of services.

Anonymous Information, if used at all, would only be used to measure the number of visits, average time spent, page views, and other statistics about visitors to this Site, to monitor Site performance for systems administration purposes, to make this Site easier and more convenient to use, for law enforcement purposes, and to report information in aggregate but not personally identifiable form to our advertisers (e.g. how many visitors log in to this Site).

If cookies are enabled for your Internet browser, then they may be used to help us measure the number of visits, average time spent, page views, and other statistics relating to your use of this Site. If you are performing a search on our Site, then a cookie is used to carry the search request data from the request page to the results page. This cookie, by itself, does not tell us your email address or who you are.

Anonymous Information can be used to serve targeted advertising on this Site. Targeted advertisements are probably more interesting for you and are more productive for our advertisers.

When information is collected from you by us as a part of an online or email survey, unless you request to receive the results of the survey, no personally identifiable information is requested during such surveys and all collected information is used on an aggregated basis only.

If you contact us, we may keep a record of the correspondence but we do not make any use of the email address or other contact information, other than to respond to the communication.

## **YOUR CONSENT**

We do not collect, use or disclose your personal information without your consent except where required or permitted by law.

We may, for example, collect, use or disclose personal information without your knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

We may also disclose personal information without knowledge or consent to a lawyer or other advisor representing us, to collect a debt, to comply with a subpoena, warrant or other court order or rules, as required for the investigation or enforcement of laws, or as may otherwise be required or authorized by law. Where a request for personal information is made by an organization claiming lawful authority for the request, we will take reasonable steps to ensure that the requesting party properly identifies its legal authority.

We will generally obtain your consent electronically on our Site. However, it may also be obtained in writing or verbally. In determining the appropriate form of consent, we will consider the sensitivity of and reasonable expectations regarding the personal information.

We will not require you to consent to the collection, use or disclosure of personal information as a condition to the supply of any products or services, except to the extent reasonably required to fulfill the purposes identified in this Privacy Policy (for example, to register you for a conference) or otherwise identified at the time that we collect your personal information.

You may withdraw your consent to the continued collection, use or disclosure of your personal information by us at any time by sending an email to [admin@ceric.ca](mailto:admin@ceric.ca), but such a request would be subject to legal or contractual restrictions. We would also require reasonable advance notice to effect any requested changes. A request that we no longer collect or use your Registration Information or Anonymous Information, may mean that we will no longer have practical means to provide you with our services or products. You may no longer be able to log in to our Site or may lose certain functionality when visiting the Site, including functionality that depends on Anonymous Information such as the placement of cookies.

## **DISCLOSURE OF INFORMATION**

We will not sell, trade, rent or license personal information that you provide to us.

We may use third party service providers to process credit card transactions and to handle our bulk mailings. Third party service providers are required to comply with privacy laws and principles comparable to ours. All credit card transactions are completed using secure electronic encryption.

We do not otherwise transfer any personal information to third parties for processing or storage.

However, we may disclose your personal information to third parties who acquire all or a substantial part of our business, including by merger, amalgamation, a sale of our assets or in the unlikely event of bankruptcy. Subject to a court order, at the time of such merger, amalgamation, sale or bankruptcy, we would contractually require any resulting entity that obtains your personal information to comply with its obligations under PIPEDA regarding your personal information, including the applicable terms and conditions of this Privacy Policy.

## **ACCESS AND ACCURACY AND UPDATE OF PERSONAL INFORMATION**

We will take reasonable steps to ensure that your personal information is as accurate, complete and up-to-date as is appropriate for its purposes and to minimize the possibility that inappropriate information may be used to make a decision about you

You may contact us to address errors or omissions relating to your personal information or to request that we update your personal information by emailing [admin@ceric.ca](mailto:admin@ceric.ca).

Upon request made in writing, we will inform you of the existence, use and disclosure of your personal information, at minimal or no cost to you, in accordance with processes and procedures that we have put in place for such requests. If you are unsure whether we have a record containing your personal information and would like to confirm what personal information we have, please send an email to [admin@ceric.ca](mailto:admin@ceric.ca) with your request, identifying all email addresses which you may have given us. If there is a cost involved at all, we will inform you at that time.

We may require additional information from you in order to verify your identity following an access request. Such personal information will only be used for the purpose of identity verification and will itself be subject to protection under the terms of this Privacy Policy.

## **SAFEGUARDS**

Where we consider it appropriate, having due regard to the sensitivity of the particular information that we collect, use or disclose, we use encryption or authentication tools, among other methods, practices and procedures, to protect certain your personal information irrespective of which format it is stored in. Our practices and procedures for safeguarding your information are regularly reviewed.

E-mails you send to us are not necessarily secure when they are transmitted to us.

It is important that you keep any user ID and password information secure and that you not share it with anyone, in order to safeguard your personal information on our Site.

There are occasionally fraudulent “phishing” emails targeting individuals who the perpetrators believe might be registered users of this Site. We never send an email which requests users to visit a Web page or to place a call and provide their user ID, password or any personal information. We will never ask you to confirm your user ID or password via email. If you ever receive such an email, do not log in from any referred link and do not provide any personal information.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify or supplement this Privacy Policy at any time.

## **CONTACT US**

We will make information about our policies and practices relating to management of personal information readily available. Please direct any questions about our privacy policies and procedures, any requests for access to our records of your personal information and any other privacy related concerns or complaints to our Chief Privacy Officer at [admin@ceric.ca](mailto:admin@ceric.ca). All privacy related complaints will be acknowledged, recorded, investigated and responded to in accordance with applicable law.