

Institute for Canadian Citizenship – Privacy Policy

The Institute for Canadian Citizenship respects your privacy. When individuals use our services, attend our events, participate in our programs, or provide feedback or donations, they entrust us with their personal information. As part of our commitment to protect this personal information, we want everyone to know our practices for the collection, use and storage of personal information.

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1. Scope and Application of the Policy

This privacy policy (the "**Policy**") relates to the personal information collected by the Institute for Canadian Citizenship, its successors and assigns (collectively, "**ICC**", "**we**", "**us**" or "**our**").

The Policy describes what personal information ICC collects; how ICC uses, shares and manages your personal information; how you can access, update and correct your personal information; the privacy choices available to you; how ICC will notify you of changes to the Policy; and how you can raise questions or concerns about the privacy policy and your personal information.

The scope of this privacy policy is limited to the personal information of donors, participants, past participants, users, volunteers and other non-ICC affiliated persons, as defined below.

(a) Who is Covered by the Policy?

The Policy applies to you when you visit one of our websites, participate in any of our programs or events, download or use the Canoo mobile application, make a donation to ICC or otherwise interact with ICC. Relevant terms are defined in this Policy as follows:

Child or Children – Minors who are younger than thirteen years old.

Donor – An individual who has made or is in the process of making a donation to ICC.

Participant – An individual who is registering or registered in a program or registering or registered to attend a current or upcoming ICC event.

- **Event** – A current or upcoming ICC event. *For example, ICC's Annual Symposium, 6 Degrees, and Building Citizenship.*
- **Program** – A program offered by ICC. *For example, the Cultural Access Pass and the Canoo mobile application.*

Past participant – An individual who has been a participant, but is no longer a participant.

Volunteer – An individual who has signed up to volunteer or has volunteered with ICC.

User – An individual who visits any of ICC's websites. A user may also be a participant, past participant, volunteer or donor.

- **Website** – Any of ICC's websites. *For example, culturalaccesspasss.ca, icc-icc.ca, 6degreesto.com, canoo.ca, and inclusion.ca.*

(b) What is Covered by the Policy?

The Policy describes how we handle your personal information, specifically, what we collect, how we collect, use, share, protect and store it. We also explain your privacy choices and how you can exercise those choices. We define "personal information" as follows:

Personal Information – Information about an identifiable person. ICC collects personal information directly from you, from our websites, programs, events, and third parties. Personal information ICC collects includes: name; e-mail address; phone numbers; citizenship information; IP address; and information obtained from a scan of a citizenship certificate.

Please note that additional terms and conditions may apply when you engage in certain of ICC's programs, events, websites and/or research. If applicable, those terms and conditions will apply together with the Policy. *For example: You are required to accept terms and conditions when you register for the Canoo mobile application. Those terms and conditions apply together with the Policy.*

2. What Personal Information is Collected and How?

ICC limits the collection of personal information to what is reasonably necessary to fulfill the purposes for which it was collected. As detailed below, we collect personal information in a variety of ways, including: directly from you, through our events, programs and websites, and from third parties. For more information on why we collect this personal information, see [How Does ICC Use Personal Information?](#)

(a) Personal Information from Volunteers and Program and Event Participants

ICC collects personal information from volunteers and participants of ICC's programs and events. If you want to participate in ICC's programs or events or volunteer with ICC, you may be asked to provide personal information, including the following types of information:

- Contact information, including: your full name, address, telephone numbers, and e-mail address;
- Date of birth (day, month, year);
- Demographic information, including: your gender, number of kids, and country of origin;
- Citizenship information, including: citizenship date, number of years in Canada, and location of citizenship ceremony;
- Employment information, including: what organization you represent and your occupation;
- Your opinions through surveys;
- Whether you are already a participant or past participant;
- Payment information (if applicable); and
- Communication preferences, including your preferred language of communication.

ICC may ask for other information which is not required to register for the program or event or to volunteer with ICC. ICC will disclose when we are asking for information that is not required to register for the program or event or to volunteer with ICC.

It is a feature of certain programs to automatically register participants in an "alumni program" when participants are no longer eligible for the initial program. If automatic registration in an alumni program is a feature of a program:

- the feature will be clearly set out when you register for the program and in the FAQs for the program; and

- any information provided to ICC in connection with the initial program is also being provided in respect of the alumni program.

You may be asked to create a username and password to participate in our programs or events. Usernames or passwords do not need to contain personal information.

Additional Personal Information Collected from Canoo Participants

ICC collects personal information both directly from you and from your mobile device through registering and activating Canoo, downloading the Canoo mobile application, and using the Canoo mobile application. In addition to the above listed personal information, ICC may collect personal information related to your mobile device. The chart below provides the types of personal information ICC collects via the Canoo mobile application from your mobile device, cellular service provider or internet service provider:

Information ICC Collects	Why ICC Collects and Uses This Information
Personal information you provide through the Canoo mobile application, or allow the Canoo mobile application to obtain, such as information required to register for the program.	To confirm your eligibility for the program and provide the program. For more information, see How Does ICC Use Personal Information?
Geolocation: If enabled, the approximate physical location of your device.	If enabled, ICC may provide you with location-based services, such as finding nearby participating cultural institutions.
IP Address: A unique numerical label that identifies your device and allows it to communicate over a computer network.	ICC uses your IP address for purposes which include: <ul style="list-style-type: none"> Communicating with your device; Providing you with services; Identifying your jurisdiction for legal and regulatory purposes; and Presenting you with offers and opportunities relevant to your region.
Camera: If enabled, the use of the camera function on your device.	Your camera is accessed, with your consent, to populate information relevant to registering and activating your Canoo membership (such as information from your citizenship certificate). To determine your eligibility for the Canoo mobile application , you may be asked to use your camera to provide a scan of your citizenship certification. ICC uses this scan to populate information relevant for determining eligibility but does not retain any image of your citizenship certificate.
Date and time of your use of the Canoo mobile application.	ICC uses this information for purposes which include: <ul style="list-style-type: none"> Confirming your eligibility for Canoo membership; Preparing post-visit surveys; Providing in-app services, such as creating a list of your "Favourite" cultural institutions; and Performing analytics.

Other Device Related Information, including: model of your device, operating system of your device, and information about device's screen size.	ICC uses this information for purposes which include: <ul style="list-style-type: none">• Identifying and communicating with your device;• Authenticating you and your device;• Providing you with services and offers compatible with your device;• Performing analytics; and• Determining the eligibility of your device.
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(b) Personal Information from Donors

ICC may collect personal information from donors, including the following types of information:

- Contact information, including: your full name, home and business address, telephone numbers, and e-mail address;
- Amount donated;
- Whether the donor was a participant or past participant; and
- Other information necessary to process a donation.

(c) Personal Information from Users

ICC may collect personal information from users, their web browser and ISP, including the following types of information:

- Information about your IP address, including: your IP address; and location data based on your IP address;
- Information about your web browser;
- Information about your visit to the website, including: when you accessed the website, which pages you accessed and for how long you accessed them, and other data relating to how you interact with the website; and
- Information about your internet service provider, including the identity of your internet service provider.

ICC may collect certain types of information electronically when you interact with ICC's website, e-mail, Canoo mobile application, social media accounts, online advertising, or through the use of our or a third party's technologies, which include cookies, web beacons, request headers and other technologies:

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

Web Beacons – The website may use web beacons (also known as tags, transparent .GIF files and single pixel .GIF files). They are small image files that have information about users, such as IP address, which can be downloaded when users visit a website or open an e-mail. Web beacons provide information on how the website is being used for the purpose of improving the website.

Request Headers – When a user accesses the website, the user's browser will make certain requests of the website. 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.

When you "opt-in" to receive additional information or announcements regarding ICC's programs, events or special offers, ICC may collect personal information directly from you, such as your name and contact information, to facilitate this communication.

If you choose to participate in programs offered by ICC via ICC's websites, ICC collects personal information necessary for participation in those programs. ICC will disclose that such required information is being collected at the time. ICC may also ask you for further information which is optional. ICC will disclose when we are asking for information that are not conditions of service.

(d) Personal Information from Research Activities

ICC may use participants' and past participants' contact information to invite them to participate in surveys and research events (such as discussion tables). Participation in ICC's surveys and research events are voluntary.

3. How Does ICC Use Personal Information?

ICC uses your personal information to provide programs, host events, communicate with you, conduct research, solicit donations, enhance your experience of ICC's websites and the Canoo mobile application, and other purposes related to ICC's mandate. ICC also aggregates and depersonalizes personal information, defined as follows:

Aggregated and depersonalized information – Personal information that has been anonymized. Because aggregated and depersonalized information does not identify an individual, it is not personal information. ICC reserves the right to use aggregated and depersonalized information in any manner it sees fit in the course of fulfilling its mandate, in accordance with applicable law. ICC does not aggregate or depersonalize sensitive information such as payment information or citizenship numbers in fulfilling its mandate. *For example, ICC may use aggregated and depersonalized information for research purposes and may provide it to other researchers who share a common focus with ICC's research and at least one common purpose.*

(a) Providing Programs and Holding Events

ICC uses your personal information to provide programs and hold events, including:

- Checking your eligibility for programs and events;
- Registering you for, administrating, and operating programs and events;
- Checking if you are already a participant or past participant;
- Conducting surveys and research about ICC programs and events;
- Improving your experience;
- Informing you of your eligibility for other programs or events;
- Understanding how ICC can fulfill its mandate and support future research; and
- Other purposes reasonably related to these purposes.

(b) Communicating With You

ICC uses your personal information to communicate with you in a variety of ways, including:

- Providing you information and updates about ICC, programs and events;
- Responding to your questions;
- Providing you information related to ICC's mandate and the roles of new Canadian citizens;
- Informing you of ICC volunteer or research opportunities;
- Asking participants and past participants to provide stories and testimonials of how they have benefited from any ICC program or event. If ICC uses a testimonial or story provided, other than to improve upon the programs or events, ICC will seek the participant's express consent; and

- Other purposes reasonably related to these purposes.

(c) Research Activities

ICC uses your personal information to conduct research relating to: immigration trends; the experiences of new Canadian citizens; the experiences that new citizens bring to Canada; and the contributions made by new citizens.

As part of ICC's research activities, your personal information may be used in manners including:

- Measuring the quality and effectiveness of programs and events, further developing programs and events, and developing new programs and events;
- Increasing public awareness about issues related to ICC's mandate;
- Measuring the attitudes and behaviours of new Canadian citizens;
- Increasing public awareness about the contributions made to Canada by new Canadian citizens;
- Contacting participants and past participants to invite them to engage in research events and surveys; and
- Other purposes reasonably related to these purposes.

(d) Soliciting Donations

ICC uses personal information to fundraise in a variety of ways, including:

- Soliciting donations from participants, past participants, users, donors and others;
- Keeping records of donations;
- Communicating with donors about ICC, programs and events;
- Processing donations; and
- Other purposes reasonably related to these purposes.

(e) Improving Your Experience of ICC Website and the Canoo Mobile Application

Use of the ICC's website constitutes consent to the collection and use of this information by ICC and its use in its aggregated and depersonalized form for purposes including:

- Better understanding how ICC's websites are used to improve the experience;
- Better understanding how program-related and event-related content forming part of the website is being used in order to improve upon how programs and events make use of the website;
- Tailoring how an individual experiences the website;
- Seeking sponsors for programs and events and reporting on the effectiveness of the web-based aspects of the programs and events to the sponsors using anonymized information; and
- Other purposes reasonably related to these purposes.

The website contains links to other third-party websites. Please be aware that the ICC is not responsible for the privacy policies and practices of these third-party websites.

(f) Aggregated and Depersonalized Information

ICC uses aggregated and depersonalized information in a variety of ways, including:

- Better understanding how programs and events are being used in order to improve and plan future events and programs;
- Applying for event and program funding and sponsorship;
- Reporting on the effectiveness of events and programs to sponsors and funders;
- Supporting ICC's research efforts; and

- Other purposes reasonably related to the purposes described in [How Does ICC Use Personal Information?](#).

4. How Does ICC Share Personal Information?

ICC may share your personal information within ICC, with our service providers and other third parties for the purposes described in the Policy and in accordance with applicable law. ICC will not sell or rent your personal information.

(a) Service Providers

ICC may engage service providers to provide certain services. Service providers provide services to ICC such as website hosting, database services, e-mail deployment, cloud application platforms, and processing financial transactions. ICC requires service providers to limit their access and/or use of personal information to provide their services and to comply with ICC's privacy requirements.

When ICC engages service providers, it requires them, through contractual means, to safeguard the disclosed information, maintain its confidentiality and not to use that information for any purpose other than providing the services for which the service provider was retained.

(b) Researchers

ICC may work collaboratively with other researchers. When ICC works with other researchers it will only share aggregated and depersonalized information, or personal information with your consent.

(c) Third Parties

In the course of providing certain programs, events or services, ICC may do so through third parties. As a result, your personal information may be collected, used and shared by the applicable third party. These third parties may have their own privacy policies and terms and conditions, which will govern their use of your personal information. ICC is not responsible for the privacy practices of third parties. *For example, a donor may choose to use the donation processing service of CanadaHelps.org via the website. If so, the donor is entering into a legal relationship with that third party.*

ICC may from time to time partner with third parties to provide participants with information relevant to ICC's mandate. These partners may include government entities and non-profit organizations. ICC will not share your personal information with these third party partners.

(d) Donations

Personal information provided by individual donors is never sold or rented to other organizations. Personal information provided by donors may be provided to a service provider in order to process a donation.

If a donor consents, the identity of a donor may be disclosed as part of ICC's donor appreciation activities.

(e) With Consent

ICC, with your implied or express consent, may share or disclose your personal information outside ICC or entities identified in the Policy, in accordance with applicable law.

(f) Other Permitted Reasons

ICC may access and/or disclose personal information without consent in special circumstances where required or permitted by law (such as to comply with legal requirements). ICC will access your personal information to protect ICC, ICC employees, ICC volunteers and ICC directors in order to protect, take action,

defend against or investigate: any legal issues; violations of the terms of use for ICC's websites or the terms applicable to any program or event; or possible illegal or unlawful activities, fraud or suspected fraud.

ICC may transfer 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.

(g) Aggregated and Depersonalized Information

ICC may share aggregated and depersonalized information with:

- Any of ICC's partner organizations, such as cultural institutions that have chosen to participate in ICC's programs or events;
- Other researchers (see [Researchers](#));
- Funders and program and event sponsors; and
- The general public.

ICC may share aggregated and depersonalized information through a variety of methods, including:

- Social media, research reports (*for example, on outcomes of programs and events, impact on new citizens and inclusion*), op-eds, conferences, presentations and other methods that educate the public on the value of arts and culture for building inclusion and belonging, the importance of inclusion and belonging and other purposes related to ICC's mandate;
- Annual reports to partner organizations including cultural institutions to help them build strategies to improve the experiences for participants and new citizens; and
- Information concerning the experiences and survey results of users, participants and past participants to funders, event sponsors, partner organizations and participating cultural institutions.

5. How Does ICC Manage Consent?

By enrolling in a program, registering to attend an event, or using the websites, you are providing your consent to the collection, use and disclosure of your personal information as set out in the Policy.

Your consent can be explicit (such as signing up for an e-mail newsletter or allowing ICC to share a program testimonial) or implied (where your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information, such as using the website).

ICC will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated in the Policy (at the time of collection) or in the terms and conditions of the specific program or event. Your consent can be withdrawn at any time, except in limited circumstances. For more information about withdrawing consent, see [How Do I Change My Privacy Choices?](#).

6. How Do I Change My Privacy Choices?

There are various methods to change and manage your privacy choices, including: unsubscribing from e-mails, changing your browser settings, contacting ICC, or using third party unsubscribe functionality.

Please note that by refusing to provide certain types of personal information or by denying or withdrawing consent to use or disclose personal information for purposes identified in the Policy, you may be unable to participate in certain programs, events or website activities.

Once you have changed your privacy choices, it may take some time for ICC's records to reflect the recent changes.

(a) Unsubscribing from E-Mails

You may opt-in to receiving ICC newsletter e-mails at the time you register for a program, event, or otherwise interact with ICC.

You may opt-out of receiving newsletter e-mails by clicking "UNSUBSCRIBE" within any ICC newsletter e-mail. You may also change their privacy choices by emailing ICC at info@inclusion.ca. Please type "UNSUBSCRIBE" in the subject line and disclose the affected e-mail address.

(b) Changing Your Browser Settings

ICC use technologies, such as cookies, to enhance the experience users have when visiting our website. You may be able to disable or delete some of these technologies using your internet browser at any time. Should you disable or delete these technologies, you may not be able to use some features of our website.

Information on how to manage these technologies may be found in your internet browser's instructions.

(c) Contacting Us

You may change your privacy choices (for non-e-mail subscription issues) by e-mailing ICC at info@inclusion.ca. Please type "WITHDRAWAL OF CONSENT" in the subject line, and clearly describe the consent being revoked and the affected individual.

(d) Third Party Functions

ICC may use third party services that use certain technologies to analyze users' browsing behaviour on ICC's websites. You can manage your privacy choices with respect to certain third parties, like Google Analytics, by using the privacy functions within their platforms. By modifying your privacy choices with these third parties, you may lose the functionality of certain features on our websites.

ICC may also embed links to other websites on our websites. These include links to: Twitter, Facebook, Instagram and LinkedIn. For more information on how to change the privacy choices of third parties, please visit the appropriate third party website.

(e) Protecting Information of Children

ICC is concerned about the privacy and safety of children when they use the internet. ICC will never knowingly solicit personal information online from children without parental consent. ICC's websites are general audience sites and are not targeted to children.

If you are a parent or guardian of a child and become aware your child has provided ICC personal information, please contact ICC through a method listed at [Who Do I Contact With Privacy Concerns or Questions?](#), and ICC will work with you to address the issue.

7. How Does ICC Protect and Store Personal Information?

ICC takes the security of your personal information seriously. We store your personal information as long as it is necessary to fulfill the purposes for which it was collected and for a reasonable time thereafter, or as permitted or required by law.

(a) How Does ICC Protect Personal Information?

Our Privacy Officer is responsible for implementing procedures to protect personal information; establishing procedures to receive and respond to complaints and inquiries; and training staff about ICC's policies and practices.

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. ICC also limits access to personal information to ICC staff on a "need to know basis". Where appropriate, ICC aggregates and depersonalizes personal information so that it can no longer be used to identify you personally.

(b) Where Does ICC Keep Personal Information?

Generally, ICC stores, accesses and uses personal information in Canada. However, some of our service providers may be located outside of Canada including but not limited to the United States and Ireland. In those cases, the personal information may be subject to the laws of the jurisdiction in which the information is used, accessed or stored.

When ICC engages service providers, it requires 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.

(c) How Long Does ICC Keep Personal Information?

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 for a reasonable time thereafter, or as permitted or required by law. Therefore, there is no single retention period applicable to personal information collected by ICC. When any personal information is no longer required by ICC for the purposes for which it was collected, ICC aggregates and depersonalizes, or destroys the personal information in a manner which takes into account the sensitivity of that information.

Information collected by a third party will be retained in accordance with the privacy policies of that third party.

(d) Material Risks of Disclosing Personal Information

In terms of communicating personal information, no method of transmitting or storing data is completely secure. Personal information transmitted over the internet cannot be guaranteed to be completely secure. Personal information retained by ICC cannot be guaranteed to be completely secure. While ICC takes the security of your personal information seriously and has implemented a series of safeguards as described at [How Does ICC Protect and Store Personal Information?](#), there is the risk that personal information provided to ICC may be obtained by others and used for credit card fraud, identity theft or other unauthorized uses of personal information. ICC expressly disclaims all representations, warranties and conditions (whether expressed or implied) that any information transmitted to or by ICC will be completely secure.

8. How Do I Request Access and Make Changes To My Personal Information?

ICC seeks to ensure that any personal information provided by users, donors, participants and past participants is as accurate, complete and up-to-date as possible in order to fulfill the purpose for which it was obtained.

(a) How Do I Access My Personal Information?

Upon request, ICC will inform you if we hold any personal information about you. You may request access to review the personal information about yourself in the possession of ICC. ICC will provide you access to your personal information within a reasonable timeframe, in accordance with applicable laws.

A minimal fee may be charged depending on the type and volume of information requested.

(b) How Do I Request ICC Change or Delete My Personal Information?

You may request that ICC change or delete personal information about yourself in the possession of ICC. ICC reserves the right not to modify any personal information, but will append any alternative text you believe is appropriate. ICC will make reasonable efforts to comply with a request to delete your personal information as long as technological or legal constraints do not limit our ability to fulfill the request.

There may be limited circumstances where ICC may retain some necessary personal information about an individual who has withdrawn consent, such as to maintain a do-not-contact list.

9. How Do I Know If There Are Changes to the Policy?

ICC may occasionally make changes to the Policy or other privacy related materials. When ICC makes changes to the Policy, an updated copy will be posted on www.icc-icc.ca and www.inclusion.ca.

For a period of at least 60 days, the word "updated" will appear next to the link to this Policy on:

- The introductory page of www.icc-icc.ca and www.inclusion.ca;
- The log-in page for www.icc-icc.ca and www.inclusion.ca; and
- The introductory page for each program.

The date that the Policy was last updated will appear at the top of the copy posted on our websites.

By continuing to visit our websites, participate in our programs, make donations, attend our events, or otherwise interact with ICC after the updated version of the Policy has been posted, you are accepting the changes to the Policy, subject to any additional requirements which may apply. If you do not agree to the changes in the Policy, it is your obligation to stop participating in our programs, attending our events, visiting our website or otherwise interacting with ICC. If you also do not agree with the changes, you may contact ICC and request we destroy all personal information about you in its possession. See [How Do I Request Access and Make Changes To My Personal Information?](#) for more information.

10. Who Do I Contact With Privacy Concerns or Questions?

In the event you have questions, concerns, or would like to make a complaint, please contact us at:

- privacy@inclusion.ca; or
- Institute for Canadian Citizenship,
260 Spadina Avenue, Suite 500
Toronto, Ontario M5T 2E4
Attention: Privacy Officer.

If ICC's Privacy Officer is unable to address your concern, you may bring the matter to the attention of the Office of the Privacy Commissioner of Canada.