

## IT Systems Privacy Policy

At Pallium Canada, we are committed to protecting your privacy and ensuring transparency regarding the collection, use and disclosure of your personal information. The purpose of this Privacy Statement is to inform you of Pallium Canada's practices relating to the collection, use and disclosure of personal information that you voluntarily provide to us through the use of our IT Systems. Our IT Systems include, but are not limited to, the Learning Management System (LMS), Pallium Canada's website, Learning Journey Application, Single Sign On provider, and any other self-hosted or third-party hosted web application or system.

This Privacy Statement also explains how you can contact us if you have any questions, wish to make changes to or delete any personal information that Pallium Canada may be holding about you. We strongly recommend that you take the time to read this Privacy Statement and retain it for future reference.

### Personal information

**Personal information:** The types of personal information or personal data we may collect about you include:

- **Contact information:** This may include your name, street address, city, province, postal code, email address, telephone number and fax number that you provide.
- **Demographic information:** This may include your age, birth date, occupation, and lifestyle that you provide.
- **Learning Experience Information:** This is information you provide to us through user surveys, instruments, quizzes course modules and learning objects.
- **Your browser or device:** Browsers and devices often collect information automatically including your Media Access Control (MAC) address, computer type (Windows or Macintosh), device manufacturer and model, language, Internet browser type and version, and browser click-through and usage data.
- **Cookies:** A cookie is a file that may be placed on your hard drive by a website to monitor your use of our IT Systems. They are also used to know whether you are logged in or not and to record browsing activity on our IT Systems. We use cookies and similar technologies to identify and provide personalized features for your use of our IT Systems. We also use them for tracking traffic patterns to and from our IT Systems. If you do not want information collected using cookies, most browsers allow you to automatically decline cookies or be given the choice of declining cookies from websites. If you decline cookies, you will not have access to our IT Systems as cookies are required to login.
- **IP Address:** Your internet service provider assigns your computer or device a number which is referred to as your Internet Protocol ("IP") address. Your IP address and information about your visit to our IT Systems may be logged in our server log files when you use our IT Systems. Your IP address may also be used to indicate your approximate location. Automatic collection of this information is standard practice for many websites. We use your IP address for purposes such as calculating usage levels and diagnosing server problems.

- Additional personal information that you provide to us directly, through your use of our IT Systems.

## Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- Regarding the personal information we collect from you in relation to your use of our IT Systems (through cookies, for example) – to help enable basic functions like page navigation and access to secure areas of our IT Systems, to enable our IT Systems to remember information that changes the way our IT Systems appears to you (such as your preferences regarding your preferred language).
- To enable you to create your profile and to connect with other members in our IT Systems.
- To enable you to access and use our IT Systems.
- To contact and communicate with you (such as by sending you course reminders, newsletters or updates with information of interest to you).
- For internal record keeping and administrative purposes.
- To provide you with custom, proof of learning documents, such as certificates of completion.
- To confirm attendance in classroom sessions.
- To obtain your input on the quality of our courses, webinars, modules and learning experiences.
- To assess the impact of our courses, webinars, modules and learning experiences in terms of changes to knowledge, attitudes, comfort and practice.
- For analytics, including to operate and improve our IT Systems.
- To comply with our legal obligations and resolve any disputes that we may have.

## Disclosure of personal information

Pallium Canada primarily shares anonymized data to ensure the confidentiality of person information. Personal information is disclosed solely to the following parties:

- Facilitators, coordinators and administrators of your learning experiences for high-level reporting, such as course and workshop attendance and activity completion.
- Facilitators, coordinators and administrators of your learning experiences for activity reporting, including responses to surveys, instruments and quizzes, in an anonymized format (with all identifiers removed).
- Third-party applications, such as marketing and customer relationship management software, which employ reasonable security safeguards to protect your personal information.
- Third parties, including Google Analytics or other relevant entities, for the collection and processing of data.
- With your explicit consent, we may share anonymous data (with all identifiers removed) with research teams to assess the impact of our courses, modules and learning experiences for the purpose of publishing academic papers.

Pallium Canada reserves the right to disclose personal information to a third party if a law, regulation, search warrant, subpoena or court order legally requires or authorizes us to do so.

## Knowledge and consent

Pallium Canada collects personal information about you only when you voluntarily provide it. We will seek consent for the use or disclosure of your personal information at the time of collection. Any secondary or optional uses Pallium might make of any personal information will be identified and you will be provided with an opportunity to accept or reject such uses.

The form of consent that we seek, whether it is express or implied, will largely depend on the sensitivity of the personal information and the reasonable expectations of the individual in the circumstances.

We will not, as a condition of the supply of a product or service, require you to consent to the collection, use or disclosure of information beyond that which is required to fulfill the purposes for which the information is being provided by you. However, your voluntary provision of additional information helps us to improve and expand the educational and information services that we offer.

You may withdraw your consent at any time, subject to legal or contractual restrictions and with reasonable notice, by contacting us.

## Storage and security

Pallium Canada makes all commercially reasonable efforts to ensure that the personal information that you provide to us is protected against loss and unauthorized access. This protection applies in relation to information stored in both electronic and hard copy form. Access to your personal information is restricted to selected employees or representatives. In addition, Pallium Canada employs generally accepted information security techniques, such as firewalls, and access control procedures to protect personal information against loss and unauthorized access.

## Retention

Pallium Canada retains your personal information only for as long as is necessary to fulfill the purposes for which it was collected and to comply with applicable laws. Personal information that is no longer required by Pallium to fulfill the identified purposes will be destroyed or anonymized.

## Correction and access

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Upon your request, we will make all commercially reasonable efforts to make the personal information that we hold about you available to you. In certain limited circumstances, such as

where the information is prohibitively costly to provide, the information contains references to other individuals, or the information cannot be disclosed for legal or security reasons, we may not be able to make all of the information that you have requested available to you. You may request access to your personal information by contacting us.

You can help us maintain the accuracy of your personal information by updating your profile in the LMS or notifying us of any changes to this information.

## Links to third-party sites

Our IT Systems may contain links to third-party websites. Please be aware that operators of these linked websites may collect your personal information, including information generated through the use of cookies, when you access their websites. Pallium Canada is not responsible for how such third parties collect, use or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information.

## Complaints

If you have reason to believe that Pallium Canada may have failed to comply with this Privacy Statement, you may make a complaint by contacting us directly.

If we are unable to resolve your complaint, you can contact the Office of the Privacy Commissioner of Canada at [www.priv.gc.ca](http://www.priv.gc.ca).

## Changes to this privacy statement

Pallium Canada reserves the right to modify this Privacy Statement at any time without prior notice. The Privacy Statement on our Learning Management System (LMS) at any given time shall be considered the current Privacy Statement in effect.

## Contacting us

In the event that you have any questions about this Privacy Statement or for any of the other reasons indicated above, you may contact us at the addresses below.

**Email:** [info@pallium.ca](mailto:info@pallium.ca)

**Mail:**

342B Richmond Road  
PO Box 67093  
Westboro Postal Outlet  
Ottawa, Ontario  
K2A 4E4

**Telephone:** 1-833-888-LEAP (5327)