



College of Paramedics of Manitoba

Unit 610 – 1445 Portage Avenue, Winnipeg, MB R3G 3P4

COLLEGE OF PARAMEDICS OF MANITOBA PRIVACY POLICY

The website www.collegeparamb.ca/ (the "Site") is operated by the College of Paramedics of Manitoba (the "College"). We respect your right to control your personal information. That is why we have developed this privacy policy (the "Policy") which describes:

- the types of personal information we collect about you;
- the purposes for which we collect that information;
- how we use that information;
- with whom we share that information;
- how we safeguard that information;
- the choices available to you regarding how we use your personal information; and
- how you can contact us about our privacy practices.

This Policy applies to the Site, as well as any other web applications, tools, forums, or social media pages offered by the College on the Site, and for any online services offered by the College including, but not limited to the registrant portal, registrant renewal, the complaint form, the Find a Paramedic search feature, and the contact us form, (collectively, the "Service").

By accessing or using the Service, you consent to the collection, use and disclosure of personal information by the College in accordance with the Policy. You may choose not to provide us with personal information. However, if you make this choice we may not be able to provide you with the application, service or information that you requested.

You can access specific sections of the Policy based on the type of information you are looking for by clicking on the links below.

1. What are the key defined terms used throughout the Policy?
2. What personal information do we collect?
3. What is the purpose of the collection of your personal information?
4. To whom do we disclose your personal information?
5. What if there is a change in the initial purpose of collection of your personal information?
6. How do we safeguard your personal information?
7. Do we transfer your personal information to third parties for storage or processing?
8. How long do we retain your personal information?

9. Do we collect, use, and disclose non-personal information about you?
10. How do we ensure the accuracy of your personal information?
11. How can you access your personal information?
12. Who do you contact if you have an inquiry, complaint, or want to request a review of your personal information?
13. How do we handle complaints?
14. If changes are made to the Policy, will you be notified? If so, how will you be notified?

1. Definitions

For the purposes of the Policy, the following words have the following meanings:

“collection” means the act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means.

“consent” means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied. Express consent is permission that is granted by an individual taking a positive step to signify consent and may be given orally, electronically or in writing. Implied consent is the assumption of consent that can reasonably be inferred from a user's action or inaction.

“user” means an individual who uses the Service provided by the College, including anyone else who accesses or visits the Site.

“disclosure” means making personal information available to a third party.

“employee” means an employee of the College, and for the purposes of the Policy only, includes agents, independent and other contractors performing services for the College.

“personal information” means information about an identifiable individual, but not aggregated information that cannot be associated with a specific individual.

“registered user” means a user who has created and registered an account with the College, as well as a Subscribing Organization that has created and registered an account or accounts with the College.

“third party” means an individual other than the user, or the user's agent, or an organization other than the College or a Subscribing Organization.

“use” means the treatment, handling and management of personal information by and within the College.

2. Information We Collect

When you interact with us through the Service, we may collect or receive the following types of information.

Personal Information You Provide To Us

You may provide us with your personal information in different ways. For example, we may collect any or all of the following personal information if the information is reasonably required to provide the Service to you:

- (a) information that you provide when you become a registered user, renew your registration, or otherwise complete forms on the Service, such as your name, email address, postal address, telephone number, age, occupation/title, educational background, criminal record checks, abuse registry information, and insurance certifications;
- (b) your log-in and password details in connection with your account, including your username;
- (c) your correspondence with College employees, including any questions, concerns or comments you may have about the Service or problems that you report;
- (d) comments, photographs, and any other content or information that you may submit to the Service; and/or
- (e) details of your requests made through the Service.

The College does not collect information related to payments to the College such as a credit card number. All purchases of College products and services will be directed to and handled by third parties such as Moneris. You will be bound by the privacy policies of these third party sites.

Technical Information We Collect Automatically

When you visit the Sites, we may collect, using electronic means, technical information. This information may include:

- (a) the IP address of your computer and which browser you used to view our Sites;
- (b) operating system;
- (c) resolution of screen;
- (d) location;
- (e) language settings in browsers; and/or
- (f) the site you came from and searched for keywords if arriving from a search engine.

This technical information (some of which in certain instances may be considered personal information) is aggregated and used to measure and improve effectiveness of our Site. We do not attempt to combine this technical information with other personal information we collect on our Site.

3. Purpose of Collection and Use of Personal Information

The College collects your personal information and will use your personal information as is reasonably required for the following purposes:

- (a) if you are a registered user, to establish and maintain your College account;
- (b) to provide web applications, the Service, and/or the other services or information that you request;
- (c) to verify your identity if you submit comments, photographs, opinions, or any other content or information to the Service;
- (d) to respond to questions, comments, requests, or complaints that you submit to the College;
- (e) to collect amounts owing from you to the College, if applicable;
- (f) to track communications with you;
- (g) to analyze use of the Service and to improve the Service;
- (h) to send emails, newsletters, regular mail or other communications you have consented to receive from the College;
- (i) to provide Service-related announcements or notifications to you;
- (j) to fulfill a purpose that we disclose to you when we request your personal information;
- (k) to aggregate your personal information resulting from the combination and/or aggregation of certain raw personal information collected from you with other data in a way that no longer personally identifies you; and/or
- (l) to meet legal and regulatory requirements.

Your personal information will only be collected and used by the College and employees, agents, partners and service providers in a manner consistent with the activities of the College. Access to your personal information by the College's employees, agents, partners and service providers is limited only to those authorized, based on their need to deal with the personal information for the reason(s) for which it was obtained, including to enable them to perform a business, professional or technical support function for the College.

4. Disclosure of Personal Information

The College may disclose your personal information to:

- (a) its employees, agents, partners and service providers as is reasonably necessary to enable these parties to perform a business, professional or technical support function for the College;
- (b) a person who, in the reasonable judgment of the College, is seeking the information as your agent; and
- (c) a third party or parties, where you consent to such disclosure or the disclosure is permitted or required by law.

5. Change of Purpose

The College will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and obtain your express consent to do so.

Please note that we may process your personal data without your knowledge or consent where this is required by law.

6. Safeguarding Your Personal Information

The College is committed to safeguarding your personal information. The College uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, misuse, modification or destruction, and any other unlawful form of processing of the personal information in our possession regardless of the format in which it is held.

The College also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information.

The College takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the information.

While the College is committed to safeguarding your personal information, we cannot ensure or warrant the security of any personal information we collect either directly or automatically from you, and you do so at your own risk.

The College cannot guarantee that such personal information may not be accessed, disclosed, altered, or destroyed by breach of any of our security safeguards. To the degree that personal information is of a sensitive nature, in the event of a breach, there may be a risk of significant harm to you which includes bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.

The College also cannot guarantee that information sent or received over the Internet is secure and does not make any representation or warranty concerning the security of personal information

communicated to or from the College via the Internet or regarding the interception by third parties.

7. International Transfers

Your personal information may be stored and processed in any country where we engage third party service providers (e.g. Canada, United States). While such information is outside of your country of residence, it is subject to the law of the country in which it is held, and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. For example, personal information stored in the United States is subject to the US PATRIOT ACT.

Regardless of where your personal information may be stored and processed, the College's practices will at all times continue to be governed by this Privacy Policy. In addition, the College has measures in place to ensure that when your personal information is transferred to a third party for processing, whether within or outside Canada, it is subject to appropriate safeguards in accordance with applicable data protection laws. These measures typically include contractual safeguards stipulating the confidentiality of the information and the purposes for which it is to be used.

Where and when appropriate, we will transmit amended personal information to third parties having access to the personal information in question.

8. Retention of Personal Information

The College will only keep personal information for as long as reasonably necessary to fulfil the relevant purposes set out in the Policy and in order to comply with our legal and regulatory obligations. To determine the appropriate retention period for your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Non-Personal Information

We may collect, use and disclose non-personal information, including aggregated data resulting from the combination and/or aggregation of certain raw data collected from you with other data in a way that no longer personally identifies you. We make no attempt to link this non-personal information with the identity of individuals. We may permanently archive non-personal information for future use in any manner whatsoever.

10. Accuracy of Personal Information

The College is committed to keeping your personal information as complete, up-to-date and accurate as is necessary for the purposes for which it is to be used. The College will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, the College will transmit amended information to third parties having access to the personal information in question.

11. Access to Personal Information

Upon request, the College will provide you with a reasonable opportunity to review the accuracy of your personal information. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you.

Also upon request, the College will provide an account of the use and disclosure of your personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, the College will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list.

In certain situations, the College may not be able to provide access to all of the personal information we hold about you. In such a case, we will provide the reasons for denying access upon request. Such reasons may include:

- (a) if doing so would likely reveal personal information about another individual that cannot be severed or the information could reasonably be expected to threaten the life or security of another individual;
- (b) if doing so would reveal any of our confidential information;
- (c) if the information is protected by solicitor-client privilege;
- (d) if the information was generated in the course of a formal dispute resolution process; or
- (e) if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law, or that of a foreign jurisdiction.

Individuals may obtain information or seek access to their personal information by contacting the Executive Director/Registrar during regular business hours.

12. Cookies and Similar Technologies

The Site uses "cookies", which are small text files placed on your computer or other device when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information.

There are three main types of cookies:

- (a) **Session cookies** are specific to a particular visit and limited to sending session identifiers (random numbers generated by the server) so you don't have to re-enter information when you navigate to a new page or check out. Session cookies are not permanently stored on your device and are deleted when the browser closes;
- (b) **Persistent cookies** record information about your preferences and are stored in your browser cache or mobile device and remain on your device between browsing sessions. For example, a persistent cookie may be used on a website to remember your log-in details so you will not need to enter those details each time you visit that website; and

- (c) **Third party cookies** placed by someone other than us which may gather data across multiple websites or sessions.

We may use the following cookies to perform the following functions:

- (d) **Strictly necessary / technical cookies** that are essential to enable you to move around a website and use its features. You cannot withdraw your consent to the use of these types of cookies because without them, the Service cannot be provided.
- (e) **Analytical / performance cookies** that collect information in aggregated form about how users interact with the Site so that we may improve functionality. These cookies are sometimes placed by third party providers which enable features or functionality provided by third parties in connection with the Service. For example, advertising, interactive content, and analytics. The parties that set these third-party cookies can recognize your device both when it visits the website in question and also when it visits certain other websites.
- (f) **Functional cookies** that allow a website to remember choices you make, recognize you when you return and to personalize content.
- (g) **Targeting / advertising cookies** that track browser habits and used to deliver targeted (interest-based) advertising.

You acknowledge that where we allow third parties to drop cookies, we have no control over those cookies or the data generated. Please refer to the third party's privacy policy for information on what information they collect and how they use it. These cookies are likely to be analytical/performance cookies or targeting cookies.

Managing Cookies

You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended on the Service. All browser settings are slightly different, so to manage cookies, you should refer to the relevant settings within your browser.

Other Technologies

We may use other technologies similar to cookies like web beacons, which are sometimes called "tracking pixels" or "clear gifs". These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited the Site or opened an email that we have sent them. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

13. Analytics

The Site may employ Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies," which are text files placed on your computer, to help the website analyze how users use

the Site, compiling reports on the Site's activity for the Site's operators and providing other services relating to website activity and Internet usage. The information generated by the cookie (including the IP address) is transferred and stored on a Google server located in the United States.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other information held by Google.

We may also use additional analytics programs from time to time to process non-personal information about you.

We make no attempt to link this non-personal information with the identity of individuals using the Service. Non-personal information may be permanently archived for future use in any manner whatsoever by the College.

Disable Google Analytics

You can prevent the collection and processing of cookie created data relating to your utilization of the Site (including your IP) via Google by downloading and installing the browser-plugin available under the following link (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Google currently offers this opt-out tool for Internet Explorer 11, Google Chrome, Mozilla Firefox, Apple Safari and Opera.

Further information concerning the terms and conditions of Google's use and data privacy can be found at <https://www.google.com/analytics/terms/us.html> or at <https://policies.google.com/privacy>.

14. Contact Us

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information, please contact the College at:

Mailing Address: 610-1445 Portage Avenue

Telephone No. 204.793.3592

E-mail: info@collegeparamb.ca

15. Complaints

The College will promptly investigate all complaints concerning our compliance with the Policy and our dealings with your personal information. If a complaint is found to be justified, the College will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.

16. Withdrawing Consent

You may withdraw your consent to the collection, use or disclosure of your personal information by the College at any time, subject to legal or contractual restrictions and reasonable notice. Your withdrawal of consent may result in the inability of the College to continue providing aspects or all of the Service to you. Please contact the College for more information regarding the implications of withdrawing consent.

17. Policy Changes

We may modify the Policy to accommodate changes in our services, changes in technology and legal developments. If we make changes to the Policy, we will provide notice through the Service, or by other means to provide you the opportunity to review the changes before they become effective.

If we make significant changes to the Policy, we will provide reasonable notice through the Service, or by other means, to provide you the opportunity to review the changes and provide your required consent before they become effective. A significant change may be using personal information for a new purpose or disclosures to new third parties.

Whenever we update the Privacy Policy, we will change the date below to indicate when the changes were made.

Date: July 20, 2020