## Website Privacy Policy

## April 17, 2017

This Privacy Policy applies only to the Personal Information of individuals using the website maintained by the Ontario Brain Institute ("OBI", "we", "us", "our") and located at the URL <u>www.braininstitute.ca</u> (the "Site"). Personal Information ("Personal Information") has the meaning defined in and governed by the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). By accessing this Site, whether or not you provide Personal Information to us, you agree to the terms of this Privacy Policy.

The Ontario Brain Institute is committed to respecting the personal privacy of individuals using this Site. We are responsible for the Personal Information we hold. The Personal Information you provide to us will be treated with care and, subject to this policy and as permitted or required by law, will not be collected, used or disclosed without your consent. The Ontario Brain Institute does not disclose, trade, rent or sell your Personal Information to any third party.

This privacy policy ("Policy") explains:

-when and how we collect your Personal Information

-how we may use and disclose your Personal Information

-how we collect and use Aggregate Information

-what you can expect if you are asked to give us additional Personal Information

-how you can access, update or withdraw your Personal Information

The Ontario Brain Institute only collects Personal Information if you choose to supply it through this Site or by contacting us via email. When the Ontario Brain Institute collects your personal information on its website, e.g., through general or specific inquiries or to register for events, the Ontario Brain Institute may collect your first and last name, email address and subject of your inquiry, for the purpose of responding to your general or specific request for information. If you agree, the Ontario Brain Institute also will add your contact information to a central contact database for the purpose of providing you with its annual report, newsletters and notification of upcoming events. You may opt-out of receiving such communications from the Ontario Brain Institute at any time by sending a request to info@braininstitute.ca.

In addition to the purposes identified, we collect your Personal Information for the following purposes:

- To provide you with information about the Ontario Brain Institute

- To send general e-mail communication
- To maintain, administer and improve the Site and its quality;
- To offer you tailored content
- To contact you in response to your general or specific inquiries
- To periodically solicit feedback from you
- To generate statistics and aggregate reports to improve the Site
- To maintain and update our contact database
- For general administrative purposes,
- For any other purposes for which we have your consent.

The Ontario Brain Institute also collects Personal Information on this Site for specific and identified purposes. For example, individuals who contact us to register for events will be asked for specific information. Personal Information that is collected in this manner will be used (and may be disclosed) for the purposes identified to you at the time of collection. Personal Information will not be used for purposes other than those for which it was collected, except with your consent or as permitted or required by law. We will retain Personal Information only as long as necessary for fulfilling the purposes identified herein and for any additional purposes identified at the time of collection.

Access to the Ontario Brain Institute contact database will be limited to only those Ontario Brain Institute staff who require access to the Personal Information for the purposes identified and to fulfill their employment responsibilities. The Personal Information will be retained only so long as is necessary to fulfill the purposes for which it was collected and will be kept confidential and secure. If other information will suffice, Personal Information will not be collected or used. We are committed to destroying or disposing of Personal Information in a manner that prevents its reconstruction.

You will be notified if the intended purpose for the collection and use of this Personal Information changes and will be provided with an opportunity to have your Personal Information deleted from our contact database. If you opt-out of receiving communications from the Ontario Brain Institute, your Personal Information will be deleted from the contact database. You may opt-out of receiving such communications from the Ontario Brain Institute at any time by sending a request to <u>info@braininstitute.ca</u>.

This Privacy Policy further provides that the Ontario Brain Institute may only disclose Personal Information:

- To third party service providers, to the extent required for the identified purposes, as described in this policy or at the time of collection;
- to other third parties, such as sponsors and the Site content partners, but only where and to the extent you give the Ontario Brain Institute your permission to do so;
- pursuant to a legal proceeding; or
- when otherwise permitted or required by law.

If we use a third party service provider to provide services to us, we will use contractual means to ensure that the service provider's collection, use and disclosure of your Personal Information, if required, is limited in accordance with standards no less protective than this Privacy Policy. We will hold that service provider accountable to facilitate our compliance with this Policy and applicable legislation.

This Site collects aggregate information ("Aggregate Information") through the use of web server logs. Those logs are used for recording information, such as:

- Service provider Internet Protocol (IP) addresses;
- Browser versions;
- Referring websites;
- Search terms used;
- Average number of pages requested;
- Average duration of visit; and
- Total visitor traffic.

Aggregate Information is standard web server / visitor traffic information, regarding overall website traffic patterns. Web servers normally collect this type of basic information as part of their web log processes. By using this Site, you consent to our using Aggregate Information collected via cookies and similar technologies to use in statistical analysis to help us track trends and analyze patterns in the use of the Site, including to enhance the Site's functionality and user experience. You also consent to our using Aggregate Information for research purposes.

The Site may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"), a company based in the United States. Google Analytics uses cookies, which are text files placed on your computer, to help the Site operator (Ontario Brain Institute)) analyze how users use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google which has servers in the United States and in other countries.

Google will use this information for the purpose of evaluating your use of the Site, compiling reports on Site activity for Site operators (Ontario Brain Institute staff) and providing other services relating to Site activity and internet usage. 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 has advised us that it will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Site. By using this Site, you consent to the processing of Personal Information about you by Google in the manner and for the purposes set out above.

The Ontario Brain Institute is committed to data security, respecting the privacy of individuals using this Site and protecting the confidentiality of your Personal Information. To prevent unauthorized access, to maintain the accuracy of Personal Information and ensure that Personal Information is collected, used and disclosed only pursuant to this policy, the Ontario Brain Institute takes reasonable steps to maintain physical, electronic, contractual and administrative safeguards to secure Personal Information collected from its Site with a level of security that is appropriate to the sensitivity of the personal information collected and that is compliant with this policy and applicable law.

For all inquiries about your Personal Information that is subject to this Privacy Policy, including requests to access, correct or withdraw your Personal Information, please send a written request to:

Dr. Kirk Nylen, Director of Knowledge Translation and Outreach Ontario Brain Institute 438 University Ave, Suite 1618 Toronto, Ontario Canada M5G 2K8

## Email: info@braininstitute.ca

You may also contact the Director of Outreach to complain about this policy or our use of Personal Information. You may also contact the Information and Privacy Commissioner of Ontario directly at:

Information and Privacy Commissioner of Ontario

2 Bloor Street East Suite 1400 Toronto, ON M4W 1A8 Toronto Area: 416-326-3333 Long distance: 1-800-387-0073 Fax: 416-325-9195 Email: <u>info@ipc.on.ca</u> (do not send personal information, including personal health information)

We reserve the right, in our sole discretion, to modify this Policy at any time and without prior notice. If we modify this Policy, we will post the change via the Site or provide you with notice of the change. By continuing to access the Site after we post a modification (via the Site or via contact with you), you

agree to be bound by the modified policy. If the modified policy is not acceptable to you, you agree to immediately stop using the Site.