



GRADUATE STUDENTS' ASSOCIATION

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GSA Privacy Policy

Policy Statement

At the Graduate Students Association of the University of Calgary (the "**GSA**"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that the GSA collects from or about you, how we use, and to whom we disclose that information.

The GSA has adopted a series of Privacy Policies to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to how we collect, use and disclose the personal information of the graduate students whom we represent, and other parties with whom we interact.

Privacy Policy Effective for Canada

It is the GSA's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes, the privacy legislation and/or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact our Privacy Officer for more information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities.

What Personal Information Do We Collect?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number, e-mail address and the information of your emergency contact;
- academic information, including, for example, your student ID number, the program in which you are enrolled, and the identity of your supervisor/advisors; and
- business relationship information, including information related to your agreements with us and your preferences (e.g. preferred telephone number at which to contact you).

The GSA represents the collective interests, but not individual opinions, of graduate students to governing bodies of the University, all levels of government and the surrounding community of Calgary and offers programs and other support to such individuals. As such, the GSA may also collect personal information from individuals participating in and/or impacted by these activities.

As a general rule, the GSA collects personal information directly from you and/or the University of Calgary. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you or implied from your actions).

From time to time, we may utilize the services of third parties and may also receive personal information collected by those third parties during the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Our Website

We may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page within our website that is viewed by that IP address and what country you are from. We may use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our other business purposes, such as: (i) customizing certain content that we think you might like based on your usage patterns; (ii) improving our products and services (including our representation of graduate students at the University of Calgary); and (iii) upgrading our website.

In connection with the foregoing, we may place a "cookie" on the hard drive of your computer to track your visit. The cookie acts as an identification card and allows

our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to our website, allowing us to understand your use of our website so that we can tailor the website to better meet your needs. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether to accept the cookie or not; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access several web pages found on the website.

In addition, we collect the personal information that you submit to our website, such as your name, address and any other contact or other information that you choose to provide by:

- purchasing tickets for an event;
- applying for a volunteer or other position through our website;
- submitting forms through the website; or
- otherwise corresponding with the GSA via our website.

Our website may contain links to other websites that may be subject to less stringent privacy standards. If you click on a link to such a third-party website, a third party may also place a cookie on your hard drive. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. The GSA is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

Finally, we may use third party analytics tools to help us measure traffic and usage trends for our website. These tools may use cookies and other technologies to collect information about your use of our website, and collect information sent by your device or our website. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, better understand your online activity, and assist us in improving our website.

For example, we use Google's Universal Analytics to better understand who is using our website and how people are using it. Google may use cookies, pixel tags and other technologies to collect and store information such as website pages visited, places where users click, time spent on each website page, IP address, type of operating system used, location-based data, device ID, search history, and phone number. We use this information to improve our website and as otherwise described in this Privacy Policy. Please see <http://www.google.com/policies/privacy/partners> for information about how Google Analytics uses this information, visit <https://tools.google.com/dlpage/gaoptout> for information about the Google Analytics Opt-out Browser Add-on, and visit <http://www.google.com/settings/ads> to adjust the settings for your Google account.

Why Do We Collect Personal Information?

The GSA collects personal information to enable us to manage, maintain and develop our operations, including, for example:

- to establish, maintain and manage our relationship with you so that we may, for example, represent you, mediate disputes that you may have, and/or provide you with the products and services that have been requested;
- to assess your candidacy for an award and/or bursary;
- to administer the GSA's Health and Dental plan;
- to send you marketing and other materials that we believe might be of interest to you;
- to be able to review the products and services that we provide to you so that we may: (i) understand your requirements for our products and services; and (ii) work to improve our products and services;
- to create Aggregated Information (as defined below) for the purposes of: (i) meeting student requests; (ii) enabling us to meet our obligations to represent graduate students at the; and/or (ii) developing new or improving existing products and services;
- to be able to comply with your requests;
- to protect the GSA against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable laws or regulatory processes; and
- any other reasonable purpose to which you consent.

We may share Aggregated Information with third parties for the purposes of managing, maintaining and developing our operations. For the purpose of this Privacy Policy, "**Aggregated Information**" arises from the compilation, combination and/or analysis of information from multiple sources on an aggregated basis (so as to prevent identification of personal information relating to any one individual) in order to identify or create, for example, trends, benchmarks, reports, summary metrics, predictive algorithms, products and/or services.

How Do We Use and Disclose Your Personal Information?

We may use and disclose your personal information:

- as permitted or required by applicable laws or regulatory requirements;
- for the purposes described in this Privacy Policy; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may also use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants, affiliates and other parties who require such information to assist us with managing our relationship with you, including: (i) third parties that provide services to us; and (ii) third parties that assist the GSA in the provision of services to you.

For example, we may share your personal information from time to time with our third-party information technology, data processing and payment processing service providers so that we may operate our business. As a result, your personal information may be collected, used, processed, stored or disclosed in the United States. As such, your personal information may potentially be accessible to law enforcement and national security authorities of that jurisdiction.

In addition, personal information may be disclosed or transferred to another party during the course a security interest of the GSA assets, or the completion of an asset or share sale of all or a part of the GSA, or some other form of business combination, merger or joint venture. A party involved in such a transaction would be bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Finally, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of the GSA's regular reporting activities to the University of Calgary;
- to protect the rights and property of the GSA;
- during emergency situations or where necessary to protect the safety of a person or group of persons; and
- with your consent.

Your Consent is Important to Us

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your

consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

As we have described above, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

Choice/Opt-Out

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer. In certain circumstances, the withdrawal of consent may render us unable to continue to provide products or services where the collection, use or disclosure of your personal information is necessary to provide the product or service.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

How Is Your Personal Information Protected?

The GSA endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction. Unfortunately, we cannot guarantee complete security: for example (i) unauthorized access use or disclosure, (ii) hardware or software failure, and (iii) other events may compromise the security of your personal information at any time.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances, we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may, with the approval of the Board, charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address any issues you have raised. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed the Executive Director of the GSA as Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

The Graduate Students Association of the University of Calgary
1030 ES, 844 Campus Place NW
Calgary, Alberta, T2N 1N4
Canada
Attention: Privacy Officer

E-mail: gsaed@ucalgary.ca

Revisions to this Privacy Policy

The GSA, from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the way we deal with your personal information. We will post any revised version of this Privacy Policy on our website (at www.gsa.ucalgary.ca), and we encourage you to refer to it on a regular basis.

This Privacy Policy was last updated on February 12, 2019.

Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore, where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights or impose upon the GSA any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.