

# Privacy Policy

---

## Intent

Protecting the privacy and confidentiality of personal information is an important aspect of the way CANADIAN INSTITUTE OF READING RECOVERY conducts its business. Collecting, using, and disclosing personal information appropriately, responsibly, and ethically is fundamental to the company's daily operations.

The company strives to protect and respect personal information of its campers, their families, employees, business partners, and so on in accordance with all applicable statutory requirements. All employees must abide by the procedures and practices set out below while handling personal information.

## Guidelines

This policy outlines the company's commitment to privacy and establishes the methods by which privacy is ensured. This policy applies to all employee personal information in the company's care, custody, and control.

Personal information is any factual or subjective identifying information about an individual or group of individuals. This can include name, date of birth, address, income, e-mail address, social insurance number, gender, evaluations, credit records, and so forth.

Business information is confidential information related to a specific business that is not readily available to the public, such as names of executive officers, business registration numbers, proprietary information, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is considered obtained by CANADIAN INSTITUTE OF READING RECOVERY when an individual provides express consent orally, in writing, or through an applicable online action. Before being asked to provide consent, individuals will be provided with the reasons their personal information is being collected, how it will be used and stored, and any disclosure or possible disclosure of the information.

Implied consent is granted by the individual where consent may reasonably be inferred from the action or inaction of the individual. Where possible, this should always be followed up by a CANADIAN INSTITUTE OF READING RECOVERY representative to obtain express consent.

## Appropriate Use

CANADIAN INSTITUTE OF READING RECOVERY collects and uses personal information solely for the purpose of conducting business. The company hereby asserts that personal information may only be used for the following purposes:

- To provide registration and payment for learning events and to enhance the learning and networking experience of those attending.
- To comply with legal and regulatory requirements

## Policy Statements

CANADIAN INSTITUTE OF READING RECOVERY assumes full accountability for the personal information within its possession and control. The company has appointed the Executive Director as custodian of all privacy matters and legal compliance with privacy laws.

In the course of conducting its business, the company may have to obtain personal information directly from the individual to whom the information belongs. Individuals whose personal information is being collected are at all times entitled to know how the company uses their personal information and that the use of any personal information collected is limited to only what is needed for those stated purposes. If necessary, CANADIAN INSTITUTE OF READING RECOVERY will obtain individual consent if personal information is to be used for any other purpose.

The company will not use that information without the consent of the individual.

Under no circumstances will the company sell, distribute, or otherwise disclose personal information, including personal contact information or employee lists, to third parties, unless required to do so by law. This may include consultants, suppliers, or business partners of the company, but only with the understanding that these parties obey and abide by this policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.

The company will retain personal information only for the duration it is needed for conducting its business and ensuring statutory compliance. Once personal information is no longer required, it will be destroyed promptly, safely, and securely. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

The company will take every reasonable precaution to protect personal information with appropriate security measures, physical safeguards, and electronic precautions. The company maintains personal information through a combination of paper and electronic files. Where required by legislation or disaster recovery or business continuity policies, older records may be stored in a secure, offsite location.

CANADIAN INSTITUTE OF READING RECOVERY will ensure:

- Access to personal information is authorized only for the employees and other agents of the company who require the information to perform their job duties, and to those otherwise authorized by law;
- The company's computer network systems and databases are secured by complex passwords and firewalls to which only authorized individuals may access;
- Active physical files are kept in locked filing cabinets;
- Routers and servers connected to the Internet are protected by a firewall, and are further protected against virus attacks or "snooping" by sufficient software solutions;
- Personal information is not transferred to employees or volunteers or any other person in the company unless authorized.

The CANADIAN INSTITUTE OF READING RECOVERY website will include our privacy policy and disclose our personal information practices. Individuals adding data into the web site will be notified about:

- Personally identifiable information about the individual that is collected from the website or through affiliate sites;
- Information about the organization collecting the data;
- How the data will be used;
- To whom the data may or may not be disclosed;
- What options are available to the individual regarding the collection, use, and disclosure of personal information;
- The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under the company's possession and control; and

- How the individual may access and correct any inaccuracies in their personal information.

In addition, CANADIAN INSTITUTE OF READING RECOVERY will explain that the company may share compiled demographic information with its business partners or advertisers, but no personal information that can identify any individual person will be disclosed. While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, but these IP addresses will not be linked to any personally identifiable information. Any registration or order form asking site visitors to enter personal or financial information will be protected by SSL encryption. Site visitors may opt out of having their personal information used at the point where the information is gathered.

In most instances, CANADIAN INSTITUTE OF READING RECOVERY will grant individuals access to personal information in the care, custody, and control of the company upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with their personal information, they should notify the company as soon as possible to make the appropriate corrections.

If the company denies an individual's request for access to their personal information, the company will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

CANADIAN INSTITUTE OF READING RECOVERY may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- The collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- The personal information was produced by the individual in the course of their employment, business, or profession, and the collection is consistent with the purposes for which the information was provided;
- The collection is made for the purpose of making a disclosure required by law; or
- Any other reason as defined in applicable legislation

Any questions or concerns regarding this policy can be addressed by contacting CANADIAN INSTITUTE OF READING RECOVERY at [www.rrcanada.org](http://www.rrcanada.org) The company will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.