



CANADIAN NETWORK *for*
the **PREVENTION** *of* **ELDER ABUSE**

RÉSEAU CANADIEN *pour la* **PRÉVENTION**
du **MAUVAIS TRAITEMENT** *des* **AÎNÉS**

PRIVACY POLICY

Canadian Network for the Prevention of Elder Abuse (“CNPEA”) respects privacy rights and the protection of personal information. This privacy policy governs CNPEA’s collection, retention and use of personal information that is collected by or provided to CNPEA either via CNPEA.ca (the “**Website**”) or otherwise.

By submitting personal information to CNPEA or its service providers and agents, you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting our privacy officer (identified below).

1. WHO WE ARE AND WHAT WE DO

CNPEA is a registered Canadian charity that fosters the exchange of reliable information, advances programs and develops policies on issues related to preventing the abuse of older adults.

CNPEA collects and processes personal information through the following areas of operations:

(i) our website allows visitors to become a member of the CNPEA organization through the third-party website Mailchimp (www.mailchimp.com). CNPEA takes no responsibility and will not be liable for any actions taken by Mailchimp ([Mailchimp terms of use](#)).

(ii) Individuals can sign up for training and educational webinars hosted through the third-party website Zoom Video Communication (<https://zoom.us/>). CNPEA takes no responsibility and will not be liable for any actions taken by Zoom. ([see their terms of use](#)).

(iii) CNPEA allows donations to be made to us through an unaffiliated third-party website, www.canadahelps.org (“Canada Helps”) which donations are made according to the CanadaHelps terms of use [<https://www.canadahelps.org/en/terms-of-use/>]. CNPEA takes no responsibility and will not be liable for any actions taken by CanadaHelps.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information means information about an individual from which that person can be identified.

Personal information we may collect, use and store includes:

- **Identity information** such as username or similar identifier, first name, last name, occupation;

- **Contact information** such as address and email address.
- **Technical information** such as internet protocol (IP) address browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website. This information may be used for analysis purposes, allowing us to provide better services to our site visitors and to provide us with demographic data.
- **Marketing / Communications information** such as your preferences regarding whether and /or how to receive marketing communications from us and/or third parties.

3. HOW IS PERSONAL INFORMATION COLLECTED?

We use different methods to collect personal information from and about you, including through:

- a. **Direct interactions** whereby you may give us your Identity, Contact, by filling in forms or by corresponding with us by post, phone, email or otherwise. Examples include during:
 - i. Sign-up to become a member;
 - ii. Subscribing to participate in an educational or training webinar hosted through our website, or to receive publications or to contact us or provide feedback;
 - iii. Requesting marketing to be sent to you; or
 - iv. Giving us feedback or contacting us to request information.
- b. **Automated technologies or interactions** whereby we will automatically collect Technical Personal information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, pixels, server logs and other similar technologies. We may also receive Technical Personal information about you if you visit other websites employing our cookies.
- c. **Third parties or publicly available sources.** We may receive personal information about you from various third parties as set out below:
 - i. analytics providers such as Google Analytics;
 - ii. digital marketing service platforms such as MailChimp;
 - iii. advertising networks such as Google Adwords, DoubleClick, Facebook and Twitter
 - iv. online telecommunications providers such as Zoom.

4. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where you consent to such collection and use, such as by consenting to this Privacy Policy, use is needed to perform the service you are requesting, or where we need to comply with a legal obligation.

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Personal information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide upon what information may be relevant for you.

Where *Canada's Antispam Legislation (CASL)* applies to CNPEA's communications with users, donors or volunteers, CNPEA is committed to complying with CASL and, in particular, the provisions setting out the requirements for sending commercial electronic messages.

You will receive marketing communications from us if you have requested information from us or made a donation to us and you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may share your personal information with other parties as set out herein.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

By providing us with Personal information, you acknowledge and agree that your personal information may be processed in countries other than Canada, where laws regarding processing of Personal information may differ from laws in Canada and/or in your country. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the Personal information. This will include putting appropriate contractual safeguards in place to ensure an adequate level of protection for the personal information.

7. HOW DO WE PROTECT PERSONAL INFORMATION?

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures that are intended to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our members, employees, workers and personal information processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator(s) of any breach where we are legally required to do so.

8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

We will only retain your Personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your personal information as detailed below.

In some circumstances we will anonymise your Personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

The vast majority of our donors and website users are Canadians; however, we have noted that (although we do not specifically target our services to EU data subjects) some of our website users and donors are from outside of Canada, including from the European Economic Area (“EEA”). For

the benefit of such users, we also endeavor to provide adequate protection for the personal data of EU data subjects in accordance with applicable EU data protection laws and regulations, including the EU GDPR. Subject to certain exemptions, you have the following rights in relation to the personal information we hold about you:

- a. **Right of Access:** If you ask us, we'll confirm whether we're processing your Personal information and, subject to any applicable exemptions, provide you with a copy of that Personal information within the timescales provided for by law. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.
- b. **Right to Rectification:** If the Personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your Personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- c. **Right to Erasure:** You can ask us to delete or remove your Personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your Personal information). If you are entitled to erasure and if we've shared your Personal information with others, we'll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- d. **Right to Restrict Processing:** You can ask us to "block" or suppress the processing of your Personal information in certain circumstances such as where you contest the accuracy of that Personal information or you object to us. If you are entitled to restriction and if we've shared your Personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- e. **Right to Information Portability:** You have the right, in certain circumstances, to obtain Personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- f. **Right to Object:** You can ask us to stop processing your Personal information, and we will do so, if we are: relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or processing your personal information for direct marketing.
- g. **Rights Regarding Automated Decision-Making and Profiling:** You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it

produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

- h. **Right to Withdraw Consent:** If we rely on your consent (or explicit consent) as our legal basis for processing your Personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10. CONTACTING US

For the benefit of EU data subjects, the Privacy Officer noted below is the “data controller” and is responsible for your personal information. The Privacy Officer is also responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our privacy officer using the details set out below.

Name: Benedicte Schoepflin, Executive Director CNPEA

Address: 1413 10th Avenue East, Vancouver, BC V5N1X4

Registered address: 208 – 1899 Willingdon Ave, Burnaby, BC V5C 5T1

Phone: 604.715.1007

Email: benedictes.cnpea@gmail.com

You have the right to make a complaint at any time to the relevant supervisory authority for personal information protection issues. In Canada, you can contact the Office of the Privacy Commissioner of Canada (“**OPC**”), see: <https://www.priv.gc.ca/en/contact-the-opc/> or analogous provincial authorities. EU data subjects can contact their relevant data protection supervisory authority. We are, of course, happy to do what we can to address concerns before you approach the supervisory authority.

Links to Other Websites

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

Changes

CNPEA reserves the right to modify or supplement this Privacy Policy at any time. If any changes are made to this Privacy Policy, a copy of the Privacy Policy as amended will be posted on our Website as soon as practicable following that update. Your continued use of the Website following such posting will signify your consent to its revised terms.