



## ISAN Canada PRIVACY POLICY

ISAN Canada (“we”, “our” or “us”), respects your right to privacy and is committed to meeting the privacy standards established by federal and provincial regulations. All of our information handling practices comply with federal and applicable provincial laws, including the *Personal Information Protection and Electronic Documents Act*, an initiative designed to further protect the privacy of Canadians.

We are committed to maintaining the accuracy, confidentiality and security of your personal and financial information. As part of this commitment, we have established “Ten Privacy Principles” to govern our actions as they relate to the use of user information.

By using this web site, you are agreeing to be legally bound by the terms and conditions set out in this Privacy Policy. If this Privacy Policy is not acceptable to you, please do not use this web site, or provide us with any of your personal information by way of this web site or otherwise.

### **Ten Privacy Principles**

#### **1. Accountability**

We are responsible for maintaining and protecting personal information that is under our control. To help fulfill this mandate, we enable members of the public to contact us with questions regarding our compliance with the Ten Privacy Principles. Contact information is provided in paragraph 10 of this Privacy Policy.

#### **2. Identifying Purposes**

We will identify and document the purposes for which personal information is collected at or before the time such information is collected.

Some examples of the type of information we might collect are:

- your name
- your e-mail address
- your mailing address
- your telephone number
- credit card information
- information collected electronically via cookies

Most of the information collected comes directly from you when you request information about us or when you register to receive our services; however, under certain circumstances we may contact a third party to receive information about you, such as when you move to a new address without notifying us in advance.

### **3. Consent**

Your knowledge and consent are required for the collection, use or disclosure of personal information, except as otherwise required or permitted by law.

There are some situations where we may disclose your personal and other information without requesting your consent. For example, we may share all or part of the information we collect with ISAN International Agency (“**ISAN-IA**”). In addition, we use the services of third party suppliers, agents and computer-data processing companies (collectively, “**Third Party Contractors**”). Before disclosing any personal information to any Third Party Contractor, we will obtain their contractual commitment to keep all such information secure and confidential, and we will ensure that only necessary information is disclosed.

In addition, personal and other information may be shared if we are subject to government tax reporting requirements or as part of a legal proceeding or court order. In such cases, we will release only the information that is legally required. In addition, we may disclose personal information to public authorities without an individual's consent to protect the public interest. In addition, we may disclose your personal and other information without requesting your consent for the following purposes:

- To protect and defend our rights, interests or property or that of ISAN-IA, any Third Party Contractor or any other person or entity, including our registrants and readers; or
- To enforce the terms and conditions of any agreement between you and us.

### **4. Limiting Collection**

We will limit the personal information that we collect from you to what we need for the purpose(s) specified by us and we will use it only for those purpose(s). Information must be collected by fair and lawful means.

With your consent, which consent you hereby grant, we may gather personal information from you in person, over the telephone, by corresponding with you via mail, or over the Internet, or from one or more third parties.

### **5. Limiting Use, Disclosure and Retention**

Information gathered from you will only be used or disclosed for the purpose for which it was collected, except as you otherwise consent to or as otherwise required or permitted by law.

Your personal information will only be retained for the period of time required to fulfill the purpose for which it was collected or as may be required by relevant laws, whichever is greater. Following this period of time, our record of your personal information will either be destroyed or erased. Notwithstanding the foregoing, you hereby acknowledge that information maintained in those portions of our database or ISAN-IA's database that are available to other registrants or readers will be retained and made available in perpetuity.

Without limiting the generality of any other terms in this Privacy Policy, you hereby consent to the collection, use and disclosure of your personal information for any and all purposes consistent with ISAN Canada's mandate, such as in connection with providing ISAN registration and user services in compliance with the specifications of the International Standard ISO 15706, and any specifications established and required by ISAN-IA.

## **6. Accuracy**

Personal information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is used.

You have the right to access, verify and request that we amend the personal information held in our files.

To help us keep your personal information up-to-date, we encourage you to keep us informed of any changes, such as if you move or change telephone numbers. If you find any errors in our information about you, let us know and we will make the corrections as soon as reasonably possible, and we will transmit the amended information to others, where appropriate. To make a change to the personal information contained in your file, please contact us as set out in paragraph 10 below.

## **7. Safeguarding Information**

We will protect your personal information with appropriate safeguards and security measures. We will also retain your information only for the time it is required for the purposes we explain.

## **8. Openness and Your Refusal or Withdrawal of Consent**

At your request, we will answer questions you may have relating to the management of your information.

We will also explain your options of refusing or withdrawing consent to the collection, use or release of your information, and we will record and respect your choices.

In many cases you are free to refuse or withdraw your consent at any time. You may do so by contacting us as set out in paragraph 10 below or in any other manner as prescribed by us from time to time. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent. Please note that you will not be entitled to refuse or withdraw your consent where continued use, retention and/or disclosure of such personal information is required under (i) ISAN-IA specifications and requirements; (ii) ISAN Canada's mandate; or (iii) applicable law.

## **9. Access**

You may contact us from time to time as set out in paragraph 10 below to confirm that the personal information we maintain is accurate and complete, and to request that it be amended where such information has changed. However, in some specific circumstances, disclosure of your personal information to you can or must by law be denied, for example, when: (i) the information is protected by solicitor/client privilege, (ii) disclosure of the information would also reveal personal information about another person, or (iii) disclosure would reveal confidential commercial information. We will do our best to provide the required information to you within a reasonable period of time and will provide an explanation if we are unable to meet your request. A fee may be charged for certain inquiries due to the time and resources required, in which case, we will provide an estimate of the amount in advance.

## **10. Concerns**

If you have any questions, concerns or problems about privacy, confidentiality or how a request for information was handled, please write to / e-mail us at the below noted addresses:

ISAN Canada  
160 John Street, 5th floor  
Toronto, Ontario, Canada  
M5V 2E5

e-mail to : [privacy@isan.ca](mailto:privacy@isan.ca)

### **Privacy Online - General**

When you visit our web site and move from page to page, read pages or download content onto your computer, we learn which pages are visited, what content is downloaded, and the address of the web site that you visited immediately before coming to our web site. However, none of this information is associated with you as an individual. Rather, it is for statistical purposes. We use this information to find out how many people visit our web site and which sections of the web site are visited most frequently.

In some cases, we may collect other information about you that is not personally-identifiable. Examples of this type of information include the type of Internet browser you are using, the type of computer operating system you are using, and the domain name of the web site from which you linked to our web site or advertisement.

Whenever you disclose personal information on-line, that information may be intercepted, collected and used. We are not responsible if that information is intercepted. You transmit information at your own risk.

We shall not be held liable for disclosure of the personal information when in accordance with this Privacy Policy or pursuant to the terms of any agreement between us and you.

We are committed to protecting the privacy of our users and have taken reasonable measures to protect the confidentiality of your information and its transmission through the world wide web and we shall not be held liable for disclosure of the confidential information when in accordance with this Privacy Policy or any agreements, if any, between you and us.

You are required to cooperate with us in order to ensure the security of your information, and it is recommended, for example, that in the event you have access to any username and password protected areas of the web site, you choose a username and password carefully such that no unauthorized access is made by a third party. You agree not to disclose your username or password to anyone or to attempt to obtain or use the username and password of any other user of this web site.

### **Other Web Sites**

This web site may contain links to other third party web sites that are not governed by this Privacy Policy. Our Privacy Policy does not apply once you leave this web site. Additionally, we are not responsible for the privacy practices employed by any third party web sites to which this web site is linked. We suggest that you examine the privacy statements of those linked web sites to learn how your information may be collected, used, shared and disclosed by them.

### **Updating the Privacy Policy**

Any changes to our Privacy Policy and information handling practices shall be acknowledged in the Privacy Policy in a timely manner. We may add, modify or remove portions of the Privacy Policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found on this page. Your continued use of this web site will be deemed your conclusive acceptance of the updated Privacy Policy.

This Privacy Policy was last updated on December 19, 2007.