



POLICY TITLE: **PRIVACY POLICY**

MONITORING: **Annual Review by Governance and Nominations Committee**

APPROVED: 2019

AMENDED:

REFERENCES:

- 1. *Income Tax Act***
 - 2. *Council for Healthy Eyes Canada Conflict of Interest Policy, 2019***
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PURPOSE:

CHEC has enacted this Privacy Policy to put into writing its current practices and to conform to recent and anticipated legislative requirements requiring organizations to have written Privacy Policies.

BACKGROUND:

CHEC values your privacy and acts to ensure that it is protected. CHEC has looked to the 10 principles of the Canadian Standards Association's Model Code (C.S.A.) to formulate this Policy, and the C.S.A Code has been incorporated into federal privacy legislation.

PRINCIPLES:

1. Information Collected: In the course of operating the services, we may collect two (2) types of information about our users: personal information and non-personal information;
2. Personal Information is personally identifiable information, such as your name, address, email address, birth date and gender. personal information is collected by us when you choose to provide it to us when registering for a service, such as when you choose to subscribe to a CHEC service, enter a CHEC promotion or choose to receive a CHEC communication (e.g. newsletter, email, etc.). In addition, if you choose to contact any of our representatives, we may keep a record of that communication so that we may fully address the subject matter. We may also receive personal information from our business partners and other third parties, provided that such third parties confirm to us that you have permitted them to share such information;
3. Business contact information includes, but is not limited to, the name, title, business address, email address or telephone number of a business or professional person or an employee of an organization is not considered personal information;
4. Non-personal Information is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access an CHEC services, and the type and version of browser or operating system being used. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors and average time spent on an CHEC services, is also considered non-personal information;
5. Non-personal information is collected or derived by us in the course of operating the CHEC services. For example, our Web servers may automatically collect non-personal information

which is provided through your browser or stored on a Cookie or through a Web Beacon when you choose to visit an CHEC Service. Non-personal information is used by CHEC as described here;

6. Use of personal information: Personal information may be used by us for the following purposes:
 - a. Providing you with the CHEC services and information you have requested from CHEC, including your use of the CHEC or associated campaign sites. CHEC may from time-to-time use your personal information to contact you about changes, enhancements or similar notices related to the CHEC services;
 - b. If you indicated that you were interested in receiving offers or information from CHEC or certain of our selected sponsors, stakeholders or advertisers, CHEC or such sponsors or advertisers may send you email materials and other communications about products and services that CHEC feels may be of interest to you. If at any time you would like to end your subscription to any such communication please contact us at councilforhealthyeyes.info@gmail.com;
 - c. If you enter a contest or other promotion offered on CHEC Website, we may, under the rules of the promotion, use your name and certain other information to administer the promotion, such as contacting, announcing and promoting the winners of the promotion; and,
 - d. CHEC may also use personal information if it has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law or in order to protect or defend a legal interest.
7. Disclosure of personal information: CHEC will not sell or rent your personal information to anyone. CHEC will only disclose your personal information to third parties:
 - a. Where you have specifically given us your consent to disclose your personal information for a designated purpose;
 - b. Who are acting on our behalf as our agents, suppliers or service providers, solely to enable us to more efficiently provide you with CHEC services and products. Such entities act under strict contractual controls, requiring them to maintain the confidentiality of all such personal information and to use such information solely for purposes related to the provision of the CHEC Services;
 - c. As may be set out in the Terms of Use applicable to an CHEC services, to facilitate the provision of such CHEC services, such as fulfilling legal requirements;
 - d. As required by law, including by an order of any court, institution or body with jurisdiction or authority to compel the production of information, or in order to protect or defend a legal interest; and,
 - e. In connection with an CHEC corporate re-organization, merger or amalgamation with another entity, or a sale of all or a substantial portion of the assets of CHEC provided that the personal information disclosed continues to be used for the purposes permitted by this privacy policy by the entity acquiring the information.
8. Links to other sites and advertisements: CHEC services may contain links to other websites and services. While we try to link only to sites and services that share our high standards and respect for privacy, please understand that we are not responsible for the content of, or the privacy practices employed by, other companies or websites. This privacy policy applies only to the CHEC services referencing this privacy policy;
9. Security: The security of your personal information is important to CHEC;
10. CHEC takes technical, contractual, administrative, and physical security steps to protect personal information that you provide to us. We instruct our employees and agents with access to your personal information that it is to be used only in adherence with the principles set forth in this

privacy policy and the laws applicable to each specific business. In certain areas, such as if you provide credit card information to us, we work to help protect the security of your information during transmission by using encryption technology;

11. You can help protect the security of your personal information as well. For instance, never give out your password, since this is what is used to access your account or registration information. Also remember to log out of your account and close your browser window when you finish using an CHEC Service or surfing the web, so that other people using the same computer won't have access to your information.
12. CHEC, at its sole and absolute discretion, may from time-to-time change its *Privacy Policy* as new CHEC services and products are added or changed; and,
13. CHEC provides you with the means to access, update, edit or delete any account or registration information you may have provided to us at any time on your own by going to the appropriate page in the account or registration section of the relevant CHEC services, and changing or deleting such information as desired. If you are unsure whether we have a record containing any of your personal information and would like to confirm whether or not we do, please send an e-mail to our designated chief privacy officer, the Executive Director, at councilforhealthyeyes.info@gmail.com, indicating all email addresses that you may have given us. If you decide at any time that you do not want to receive any email materials to which you have subscribed, you may choose to unsubscribe to these e-mails by following the instructions at the bottom of the email material.

