



CAPIC Privacy Policy

Last updated: March 4, 2019

Overview and Scope

The Canadian Association of Professional Immigration Consultants (“**CAPIC**”, “**we**” or “**us**”) takes steps to meet privacy principles and requirements with respect to personal information under applicable privacy and personal information protection legislation. This privacy policy (the “**Privacy Policy**”) applies to the websites operated by CAPIC, including our main CAPIC site (www.capic.ca), My Consultant website (www.myconsultant.ca), NCIC (National Citizenship and Immigration Conference) website (<http://ncic-ncici.ca/>) and Education Partner Symposium website (<http://www.eps-spe.ca/>) (the “**Sites**”). The purpose of this Privacy Policy is to inform the users of the Sites (“**you**” or “**your**”) as to how we collect, use, disclose and protect your personal information collected through the Sites. “**Personal information**” is information about an identifiable individual, as more particularly described under applicable privacy legislation. Personal information includes, for example, an individual’s name, address, birth date, social insurance number, and other types of information as defined under applicable laws.

Please read this Privacy Policy carefully.

Changes

We reserve the right to change any part of this Privacy Policy at any time. We will indicate at the top of this page the date this Privacy Policy was last amended. If we make any substantial changes to this Privacy Policy and the way in which we use your personal information, we will post these changes on this page and will do our best to notify you of any significant changes. Please check our Privacy Policy on a regular basis. To the fullest extent permitted by applicable law, your provision of personal information to us after the date specified in such notice constitutes your full agreement to the collection, use and disclosure of your personal information in accordance with the terms of this Privacy Policy, as revised.

Consent

Your consent to the collection, use and disclosure of personal information may be given in various ways. Your consent may be express (whether orally or in writing) or implied (for example, when you provide information necessary for a service you have requested) or, in some circumstances by not withdrawing your consent where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose (such as by using an “opt out” option provided).

Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Policy, if applicable, or otherwise at the time of collection. By using any Site and providing personal information through the Site, you consent to the collection, use, and disclosure of the information as specified in this Privacy Policy.

To the extent that you provide any personal information about another individual to us (such as, for example, when you provide to us information about a student for participation in our Education Partner Program), you represent and warrant that you have obtained the consent of that individual for this purpose or that you are lawfully authorized to consent to the collection, use, and disclosure of personal information on behalf of that individual

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes

described in this Privacy Policy or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, to maintain reasonable business and transaction records or to fulfil our legal obligations).

What Personal Data Do We Collect?

We collect personal information as necessary to perform our activities and provide you with products and services, and to comply with applicable law. We may collect and process the following information about you that you provide directly (such as by filling in web forms or applications) or through authorized third parties:

- a) Personal and contact information, such as name, company name, address, address, phone number and e-mail address;
- b) Information that you provided when you become a member of CAPIC, such as your gender, date of birth, country of citizenship, residency status, professional training information, practice specialties and languages spoken;
- c) Passport information when required to participate in certain programs;
- d) Billing and other financial information you provide when you initiate a payment transaction, such as credit card information;
- e) Information included in e-mails and other communications sent or submitted to CAPIC through the Sites;
- f) Responses to optional surveys that you complete;
- g) Information you provide in the context of your participation in contests or competitions which may be made available on a Site from time to time; and
- h) Information that is automatically collected using technology that allows electronic tracking of information, as further explained below in the section titled "IP Addresses, Cookies and Click-Through URLs".

How Do We Use Your Personal Information?

The personal information we collect may be used or disclosed by CAPIC for the following purposes:

- a) to facilitate membership and events management;
- b) to communicate with you in relation to your membership, an event or any good or service you obtain from us;
- c) to understand you and serve you better;
- d) to respond to your questions or inquiries;
- e) to facilitate and process your orders or applications you submitted, and facilitate any payment;
- f) to administer or otherwise carry out CAPIC's obligations in relation to any agreement we have with you;
- g) to anticipate and resolve problems with any goods or services we supply to you;
- h) to maintain reasonable business and transaction records;
- i) to improve our products and services;
- j) to meet legal and regulatory requirements;
- k) to send you informational or promotional communications that you have agreed to receive;
- l) to conduct market research and surveys and for statistical purposes;
- m) to conduct promotional activities, including contests;
- n) to carry out other purposes that are disclosed to you and to which you consent; and/or
- o) to carry out any other purpose permitted or required by law.

You may opt out of the use of your personal information for secondary marketing purposes by contacting us as outlined below. You may unsubscribe from receiving notices from us by following the instructions in communications we send you.

Do We Disclose Your Personal Information?

We may disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct inquiries into possible breaches of obligations or law and pursue legal action, to protect our rights, safety or property, to collect a debt owed to us, or otherwise as required or permitted by law. We may also other disclose information to third parties with your consent.

If CAPIC becomes involved in a reorganization or transaction, your information may be provided to the entities and advisors involved, for the purposes of determining whether to proceed with the transaction and, where applicable, concluding the transaction. Your information may be transferred to our successor or assign that may use and disclose the information for similar purposes as those described in this Privacy Policy.

CAPIC may also use de-identified personal information, or other non-personally identifying information, and share it with third parties for any purpose.

Service Providers

We may transfer your personal information to affiliates and third party service providers that will process it on our behalf, for example to facilitate payments or to operate computer systems on our behalf.

Personal information we collect is maintained at our offices or on our servers or those of our service providers and will be accessible to our employees and those of our service providers that require it for the purposes of their duties. Some of the personal information we collect may be stored or processed on servers located outside your jurisdiction of residence and become subject to the laws of such foreign jurisdictions, including those providing access to governments, courts, or law enforcement in those jurisdictions.

How Do We Protect Your Personal Data?

CAPIC is committed to protecting the personal information of individuals who use the Sites. We have implemented technology and policies with the objective of protecting your privacy from unauthorized access and disclosure and improper use. We retain personal information that we collect for as long as reasonably necessary to fulfill the purposes for which it was collected or to meet any legal requirements.

All third parties that obtain personal information from us (e.g. service providers that perform functions on our behalf) are required to protect your confidentiality and personal information in a manner consistent with this Privacy Policy, and/or as required by law.

IP Addresses, Cookies and Click-Through URLs

We may obtain information about the general Internet usage of users of our Sites by using a cookie. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. Cookies contain information that is transferred to your computer's hard drive. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

Cookies help us to improve our Sites and to deliver a better and more personalized service, by storing information about your preferences, and allowing us to customize our Sites according to your individual interests, to speed up the delivery of pages a user commonly uses and to recognize a user when the user returns to one of our Sites.

We may use both “*session*” cookies and “*persistent*” cookies on our Sites. Session cookies will be deleted from the user’s computer when the user closes his/her browser. Persistent cookies will remain stored on the user’s computer until deleted, or until they reach a specified expiry date. You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Sites. Disabling a cookie or category of cookies does not delete the cookie from your browser; you will need to do this yourself from within your browser. If you have disabled one or more cookies, we may still use information collected from cookies before your disabled preference was set.

We may occasionally use a “click-through URL”. When you click one of these URLs, you pass through our web server before arriving at your final destination. We track click-throughs to help us improve the user experience, determine your interest in particular topics and measure the effectiveness of our customer communications.

We may also use Google Analytics, which is a web analytics tool utilizing first-party cookies to track visitor interactions with the Sites. Google Analytics customers can view a variety of reports about how visitors interact with their website that helps website owners better engage its visitors and improve its website. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit the Sites. For more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page <https://tools.google.com/dlpage/gaoptout>.

You can learn more about cookies at the following third-party websites:

- AllAboutCookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

What Are Your Rights?

Subject to applicable law, you have a right to request access to the file containing your personal information and to request the correction of inaccurate personal information it contains. To request access or correction to your personal information in our files, please contact us as outlined below.

How to Contact Us

If you have any questions regarding this Privacy Policy, or if you would like to request access to or correction of the personal information in your file, obtain information about our practices with respect to foreign service providers and/or report any violation of this Privacy Policy, please contact our Privacy Officer in writing at info@capic.ca.