

# Corporate Privacy Policy Respecting the Collection, Use and Disclosure of Personal Information (“Privacy Policy”)

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The Canadian Cardiovascular Society (“**CCS**”) is a national professional society of cardiovascular clinicians and scientists. The CCS promotes cardiovascular health in Canada by disseminating research and best practices, organizing and promoting educational publications, education programs and other events. The CCS is a data controller and processor of factual or subjective information, recorded or not, that can be used to directly or indirectly distinguish, identify or contact a specific individual (“**Personal Information**”). Personal Information may be collected and processed through the services offered by CCS. Note that some Personal Information may be found in the public domain by accessing publications such as telephone directories online.

## **Scope of this Privacy Policy**

This Privacy Policy applies to all Personal Information collected, used or disclosed by us, whether from a CCS Member, prospective member, or others who have expressed an interest in the CCS or have participated in an event sponsored or organized by the CCS.

CCS keeps Personal Information as long as it is needed to fulfill the purposes identified below, or otherwise identified in advance of a request for consent. When Personal Information is no longer required to fulfill the identified purposes, the CCS applies all commercially reasonable safeguards to safely and securely destroy said Personal Information.

## **Commitment to Privacy of Personal Information**

The CCS is committed to protecting the privacy of its members and others who use CCS products and services. This Privacy Policy sets out our practices regarding the collection, use and disclosure of Personal Information in connection with the products and services the CCS provides, including our websites, such as [ccs.ca](http://ccs.ca), [cardiocongress.org](http://cardiocongress.org) and [MY.CCS.ca](http://MY.CCS.ca). By becoming a CCS member, maintaining such membership, attending a CCS event or program, communicating with CCS, taking part in a committee/working group or otherwise receiving services from the CCS, you consent to our collection use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy.

The CCS collects, uses, and discloses Personal Information only with valid legal consent of the individual, except as otherwise permitted or required by law. Members and users can

withdraw their consent of the use of their Personal Information by contacting the CCS and informing the CCS Privacy Officer at 1-877-569-3407 or [privacy@ccs.ca](mailto:privacy@ccs.ca) of that request. CCS services are not directed to children under the age of 16. You may not use our services if you are under the age of 16.

CCS makes every reasonable effort to protect the Personal Information we collect by implementing commercially reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. We ensure that CCS employees are aware of the importance of maintaining the confidentiality of Personal Information.

### **Changes to this Privacy Policy**

The CCS changes constantly and the Privacy Policy may be updated from time to time, to reflect developments in its practices, new technology or the law. Please check our website frequently to see recent changes. The CCS will include a *News Update* when the Privacy Policy is updated and will notify members/users with notification of Privacy Policy updates through electronic communications. Unless stated otherwise, our current Privacy Policy applies to all information that we have about an individual. The CCS will never materially change its Privacy Policy to make it less protective of an individual's information collected in the past without the consent of the affected individual.

### **Types of Information the CCS Collects and Uses**

The Personal Information that CCS generally collects processes and uses includes names, first names, surnames, email addresses, date of birth, names of affiliated institutions and/or employers, addresses or any geographic indications, professional specialization, usage data, IP addresses, phone numbers, social media account information, degrees/certifications and information collected through cookies, and other tracking technologies, and banking or credit card information (card number, type, CVV code, expiry date and billing address – collectively, “Payment Information”). Per Payment Card Industry (PCI) Compliance, we do not accept Payment Information via email. Payment Information received via fax, phone, or mail is entered into a secure system and then destroyed after use. Members and users may voluntarily provide additional information in their membership/contact profile, such as areas of major interest and areas of interest in serving the CCS.

CCS assigns a personal identifier to each member or **user** in our database so that **individual** can use this number when contacting us or registering for an event.

**The collection of personal information will be limited to that which is needed for the specific purposes identified by the CCS within the Privacy Policy and/or at the time of collection.**

## Accuracy

The CCS seeks to ensure that the Personal Information it collects, processes and/or uses is accurate and up to date. Please assist the CCS Privacy Officer by advising of any inaccuracies so that appropriate corrections can be made. Alternatively, members and users may edit their profile via MY.CCS.ca at any time to change, add, or remove Personal Information.

## The CCS Collects and Uses Your Personal Information For:

### 1. Membership

The CCS collects and uses Personal Information from members and individuals who are applying to become members of the CCS for the following purposes:

- to determine an individual's eligibility for membership in the CCS;
- to process a membership application or renewal;
- to collect and process membership dues;
- to keep members informed about CCS programs, services and activities such as educational programs, update and published practice guidelines, etc.;
- to provide members with a monthly electronic issue of the *Canadian Journal of Cardiology*, which is a benefit of membership;
- to provide members with periodic newsletters and updates, announcements and special promotions regarding CCS products and services;
- to keep members informed about information, activities and events of other organizations on topics related to the aims of the CCS;
- to gain insight, develop and market products and services that are tailored to the interests of members and those registering to our events;
- to help CCS monitor and respond to Equity, Diversity and inclusion (EDI) trends and issues, and to help the organization report on its progress towards EDI goals, CCS collects the following EDI data: gender, race, sexual orientation, disability status and year of birth;
- to assist CCS with the maintenance of our membership database and other individual contacts;
- to engage members of the cardiovascular community;
- to respond to members' questions and communications;
- to facilitate affiliate membership;

- to analyse the demographics and segmentation of the membership for future planning purposes;
- to contact members with respect to requesting their participation in the affairs of the CCS, such as committees and working groups; and
- to help us understand our members' needs and interests to better tailor our products and services.

For the convenience of members, the CCS prepares and makes available a directory of members. The directory is available to members only and can be accessed via the member-only portal MY.CCS.ca. At any time, a member may request NOT to have his or her Personal Information included in the directory. To be removed from the directory, visit MY.CCS.ca, click on communication preferences and select "Exclude me from directory" under Member Directory Opt Out. Members can also inform CCS on how they wish to be contacted through MY.CCS.ca.

## *2. Participants in Canadian Cardiovascular Congress (CCC) and Events*

The CCS collects and uses Personal Information of participants in CCC and other events for purposes including but not limited to the following:

- to process registration before an event;
- to carry out the organization and administration of the event, including facilitation of accommodation and event particulars for delegates, development of marketing, programming and event material, and confirmation of event attendance;
- to make a list of attendees (those who have consented) available at an event;
- to submit and review scientific work / presentation for consideration for presentation at an event;
- to invite participants to future events that are likely to be of interest to them;
- to notify participants about the benefits of joining CCS; and
- in certain circumstances, limited Personal Information may be shared with exhibiting companies and/or sponsors as it relates to their participation in the event. CCS does this in order to inform you about services or products we believe might be of interest to you.
- Usage Data is not collected for the purpose of identifying the end-user. See section titled De-identification of Personal Information.

## **CCS Sharing or Disclosure of Personal Information**

The CCS is responsible for all Personal Information under its custody and/or control, including information which it may transfer to a third party for processing or those who provide services to CCS. CCS will only share Personal Information with the consent of the individual(s), whose Personal Information is to be shared.

Where the CCS discloses Personal Information to a trusted third-party organization, the CCS will enter into a written agreement to require such third parties to use the Personal Information only for the purposes for which it is provided to them, and to protect the privacy of the Personal Information in accordance with privacy laws and in a manner that is consistent with this Privacy Policy.

## **Consent**

The CCS uses Personal Information only with meaningful legal consent of the respective individual(s), except as otherwise permitted or required by law. The consent provided for the use of Personal Information is for the specified, explicit and legitimate purposes as outlined in this Privacy Policy, and/or as otherwise specified prior to express consent. An individual may withdraw his or her consent to the use of Personal Information by contacting the CCS Privacy Officer by emailing [privacy@ccs.ca](mailto:privacy@ccs.ca). In addition, when an individual submits a membership application or membership renewal, or registers for a physical or virtual event, the individual will be given an opportunity to opt-out of receiving further information from the CCS or from any other third party. The CCS will explain the consequences if the individual decides to withdraw their consent for CCS to use their Personal Information. Any request to withdraw consent will be processed within the legally required time periods.

Although there is no obligation to provide Personal Information to CCS, CCS reserves the right to withhold any of its services, including event participation, where an individual does not provide the relevant Personal Information required to carry out at least one of the purposes of the service in question.

## **De-identification of Personal Information**

The CCS may de-identify information by removing any identifier of a specific individual or household from Personal Information, such that it no longer falls within the definition of Personal Information (“De-identified Information”). De-identified Information may be used by the CCS for the purposes of reporting and analyzing how users interact with CCS Apps and/or for other research purposes, such as research regarding behavioral inferences. CCS may share De-identified Information and resulting reports and analyses publicly and with other third parties.

For EDI information, small data sets (less than 10 people) will either be suppressed or consolidated into larger samples to ensure confidentiality.

## Donations to the Canadian Cardiovascular Society

The CCS collects donations from members for the Canadian Cardiovascular Society Academy (the "**CCSA**") to support their activities in the fields of education and research, such as scholarships and bursaries. For the purpose of such donations, the CCS, on behalf of the CCSA, collects name, contact information and Payment Information. The name and contact information are provided to the CCSA (note, CCS is the secretariat for the CCSA) and used only to process and administer donations, to recognize donors in CCSA publications and in various locations during the annual Canadian Cardiovascular Congress (CCC), and to issue tax receipts. Note: members/individuals can opt to not have the donations acknowledged by contacting the CCS office or by updating the required field as part of their profile at MY.CCS.ca.

## CCS Affiliates

To streamline the membership application and renewal process for a number of CCS Members, the CCS collects membership dues on behalf of CCS Affiliates. The CCS is the secretariat for affiliates and manages the collection of this data for the purpose of membership following the CCS' Privacy Policy.

In some cases, the third-party organization that performs services on behalf of the CCS may use or store Personal Information outside of Canada. Personal Information stored outside Canada may be subject to different laws than those in Canada and may be accessible to law enforcement agencies outside of Canada where permitted by law.

**For example, our *Canadian Journal of Cardiology (CJC)* publisher, Elsevier Inc. is a world-renowned publisher of many top medical journals amongst other significant publications. Elsevier will be using your Personal Information in order to provide you with your subscription to the *CJC* and to inform you of upcoming Journal topics.**

The CCS is committed to the protection of privacy and will evaluate the privacy implications associated with disclosing Personal Information to a third-party service provider in a given jurisdiction before establishing a relationship in which Personal Information will be disclosed.

## Information Received from Other Sources

The CCS sometimes uses mailing lists from other organizations with whom the CCS participates in organizing or sponsoring programs, publications, seminars, conferences or other events. When the CCS does so, these other organizations are required to provide only the information of individuals who have consented to the sharing of their information to the CCS. When the CCS uses the individuals' Personal Information, the CCS will provide the individuals with information in accordance with applicable law. The information provided to the individuals may include identity and contact details of the CCS, contact details of the CCS' Privacy Officer, purposes of information processing/usage, legal basis for the information

processing/usage, and the ability of the individual to withdraw consent. The CCS will inform the individual of the use of their Personal Information within a reasonable period of time as prescribed by the applicable law. At the time of contact, the CCS will ask the individual whether or not further communications from CCS is desired. The CCS will respect the wishes of the individual.

## **Website**

The CCS provides information and some member services via its websites [www.ccs.ca](http://www.ccs.ca), [cardiocongress.org](http://cardiocongress.org) and [MY.CCS.ca](http://MY.CCS.ca) (the “Sites”).

## **Information for Healthcare Professionals**

Some of the material on the Sites are made available only to healthcare professionals. In order to access this information, a user is asked to register and to provide Personal Information, including information about professional qualifications. This information is used for the purpose of verifying the user's status as a healthcare professional. The CCS may also use this information to send a user further information about CCS website activities in accordance with the wishes the user expresses on the registration form. Lists of registrants on the Site are not disclosed to other organizations.

## **Cookies**

This Sites use cookies to offer you a better browsing experience. Cookies are small amounts of data that are transferred to a user's browser to customize a site to an individual's interests or to retain Personal Information, such as a password, for the next visit. Upon the valid legal consent of the user, the Sites may use the cookies. The user can withdraw their consent for CCS' use of cookies by contacting the CCS Privacy Officer. Additionally, the user can set his or her browser not to accept cookies and still access the Sites, although as a result, certain areas of the Sites may be unavailable or difficult to use.

## **Personal Data Collected Through Sites**

The CCS may collect personal data through your use of the Sites including (without limitation) member ID number, password and email address. Certain information about a user's computer may also be collected when a user visits the Sites, such as the type of the internet browser and operating system of a user's computer and where applicable a user's IP address and information relating to a user's internet service provider.

You are not required by law to provide your Personal Information for the purpose of visiting the Sites but CCS may be unable to provide you with the information, services and facilities you may require unless you provide CCS with the requested Personal Information data for administration, security or other reasons.

## **Linked Websites**

We are not responsible for the contents available on, or the set-up of, or the Personal Information collected (if any) by any other websites linked to our Sites. Linking or access to and use of such other websites is at the user's own risk and subject to any terms and conditions applicable to such accessor use.

## **Safeguards**

The CCS protects Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, modification and destruction by using appropriate security measures in accordance with applicable law.

The CCS designs its systems with security and privacy in mind. We work to protect the security of Personal Information during transmission. We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data. The CCS also maintains physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of Personal Information. Our security procedures require that we may occasionally request proof of identity before we disclose Personal Information to you. It is also important for the member/user to protect against unauthorized access of their password and computers, devices, and applications. Be sure to sign off when you finish using a shared computer.

CCS employees with access to Personal Information are required to respect the confidentiality of that information pursuant to their employment agreement with the CCS. Employees also participate in privacy training. The CCS implements methods of protecting Personal Information that include reasonably limiting access to the Personal Information, restricting access to offices where information is held and technological measures such as passwords.

The CCS' Privacy Officer is responsible for the internal controls and safeguards over this member information. This includes controlling access to this information and setting standards for the use of the information. In doing so, the Privacy Officer ensures that access controls are documented and subject to regular review.

## **Accessing to Your Personal Information**

Subject to applicable law, a member or user may request access to the Personal Information held about him or her at any time. Alternatively, members/users can access their profile via MY.CCS.ca. An individual has the right to request access to, correct, and delete their Personal Information, and to ask for data portability. The individual may also object to CCS' processing of their Personal Information or ask that the CCS restrict the processing of their Personal Information in certain instances. If you wish to do any of these things, please contact the CCS Privacy Officer at 1-877-569-3407 or [privacy@ccs.ca](mailto:privacy@ccs.ca).



The CCS will endeavour to respond to any such request as quickly as possible and, in any event, within the legally required time periods. Subject to certain exceptions and limitations prescribed by law, an individual will be given access to any Personal Information the CCS holds about the individual. For example, the individual may be able to obtain confirmation as to whether his or her Personal Information has been processed, when, where and with what purpose. Any information provided to the individual will be provided in a commonly used and machine-readable format. The CCS will correct or amend Personal Information that is shown to be incomplete or inaccurate with the individual's consent and in accordance with applicable law.

### **Breach Notification**

In case of a Personal Information breach by the CCS and the breach is likely to result in a risk to the rights and freedoms of the individual, the CCS will without undue delay notify the individual and the supervisory authority of the breach in accordance with applicable law.

### **Questions and Complaints**

For further information about this Privacy Policy or the practices of the CCS related to Personal Information, or to make a complaint, please contact the CCS Privacy Officer at 1-877-569-3407 or [privacy@ccs.ca](mailto:privacy@ccs.ca). The CCS will investigate all complaints and take appropriate action as a result of such investigation.