

McCall MacBain Scholarships at McGill PRIVACY POLICY

The McCall MacBain Scholarships at McGill ("MMSM") is committed to maintaining the accuracy, security and privacy of the personal information it collects uses and discloses in accordance with applicable legislation. This privacy policy (the "Privacy Policy") is a statement of principles and guidelines concerning the protection of personal information of our scholarship applicants, our scholars, our award recipients, donors, members, directors, volunteers, service providers, employees, advisors, and partners (an "individual"). MMSM values the trust of those we deal with, and of the public, and recognizes that maintaining this trust requires that we be accountable and transparent in how we treat the information that you choose to share with us.

CONSENT

BY SUBMITTING PERSONAL INFORMATION TO MMSM OR ITS 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 us as set forth below. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information that may be of value to you.

1. MMSM

MMSM is a not-for-profit organization incorporated under the *Canada Not-For-Profit Corporations Act* and a registered charity with the Canada Revenue Agency. MMSM's mission is to build a community of formidable leaders and creative professionals dedicated to advancing global understanding and improving human welfare throughout the world.

Through its various programs, scholarships and activities, MMSM frequently gathers and uses personal information. Any personal information collected by MMSM is subject to the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 (Canada) and the *Act respecting the protection of personal information in the private sector*, CQLR c P-39.1 (Quebec) (collectively "**Privacy Legislation**").

2. Personal information

Privacy Legislation defines personal information broadly as information about "an identifiable individual" or as information that allows an individual to be identified. The types of personal information that we may collect from you from time to time include, without limitation:

- A. <u>For applicants:</u> name, addresses, contact information (email and phone number), gender, pronouns, nationality, birthplace, birthdate, family member information, education and employment history (including scanned/digital academic transcripts), awards received, volunteer work, creative work, scans of identification and nationality or residency documents (e.g. passport, birth certificate, certificate of legal permanent residency), biography and résumé information, personal essays and study intentions, photograph, endorsements and references (which include endorser and referee contact details), activity verifications (which include verifier contact details), criminal background checks, languages, conduct disclosures, data obtained through cookies and similar technologies, and any additional information applicants may voluntarily provide to MMSM.
- B. <u>For scholars and award recipients:</u> in addition to personal information mentioned in section A above, we may collect information regarding plans for study at McGill University and university application forms, academic progress, extra-curricular interests, pursuits and achievements, future employment or research plans, feedback on experience with MMSM or McGill University, records of personal communication with MMSM, records of participation in MMSM or McGill University activities and programs, dietary restrictions, social insurance number, bank details, and any additional information scholars or award recipients may voluntarily provide to MMSM.
- C. <u>Others</u> (including members, volunteers, mentors, assessors, interviewers, donors): name, address, contact information (email and phone number), gender, pronouns, biography and résumé information, languages, photograph, conflict of interest disclosures, records of personal communication with MMSM, dietary restrictions, and data obtained through cookies, and similar technologies.

3. Purposes of collection

MMSM collects personal information for the following purposes: to determine an individual's eligibility and selection for MMSM's scholarships and awards; to administer MMSM's scholarships and awards; to conduct research related to the activities of MMSM, for program planning, evaluation and review for generating statistics for these activities; to provide tax receipts, T4As and other such documentation; to establish the qualifications of MMSM's volunteers (assessors, interviewers, mentors etc.); to provide an individual with information about MMSM, its activities and the activities of the scholars and award winners; to detect and protect MMSM and other third parties against error, fraud, theft and other illegal activity, and to audit compliance with MMSM policies and contractual obligations; to understand and respond to scholars, donors, suppliers and other third party needs and preferences, including to contact and communicate with such parties and to conduct surveys, research and evaluations.

4. Disclosure of personal information

MMSM interacts with a number of third parties and may, from time to time, exchange personal information under the following circumstances:

A. <u>To service providers:</u> We may disclose your personal information to other companies that provide services on our behalf, including label printers, delivery contractors, auditors, our software developers (including website developers and hosts), data processing, document management and office services. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose.

You can find attached as schedule A, the list of service providers with whom MMSM currently has a relationship. This list may be amended or updated, from time to time, to meet our operational needs, without any further notices of consents.

- B. <u>To Headlands Institute</u>: Headlands Institute is a Canadian non-profit organization that administers programs on behalf of MMSM.
- C. <u>To McGill University</u>: In order to assist a scholar or an award recipient with placement in a program, we may need to have conversations on your behalf that could constitute the sharing of personal information from your application form and other forms.
- D. To members, university representatives, volunteers, mentors, advisors, coaches, assessors and interviewers: As part of the review process, applications are disclosed to relevant university representatives and selection committees composed of experts recruited from all sectors of society. As part of their participation in the programs offered by MMSM to scholars, award recipients and alumni, personal information may be shared. All participants and volunteers in these activities are advised of MMSM's expectations with regard to the confidentiality and protection of the information entrusted to them.
- E. <u>For promotion:</u> With your prior consent, we may disclose your personal information, on an asneeded basis, to media relations companies, universities, and journalists to help promote MMSM, its scholars and award recipients.
- F. If required by law: MMSM may disclose your personal information to a government institution that has asserted its lawful authority to obtain the information or where MMSM has reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to MMSM's legal counsel.

5. Control of personal information

We want you to be able to maintain control over how we use your personal information.

As such, marketing email communications will always include an identification of the sender and an "unsubscribe" option. You also have the right to access and rectify your personal information, as indicated in section 8 below.

As indicated above, you may refuse or withdraw your consent to certain of the identified purposes at any time. That said, we may not be able to provide you with information, services, scholarships or awards if you withdraw your consent to our use of your personal information that we require to administer our awards and programs.

In order to specify your privacy preferences, please contact our Privacy Officer, using the contact information provided in section 11 below.

6. Retention of personal information

MMSM retains the personal information it collects for a period of not less than five years. When personal information is disposed of by MMSM, care will be taken to ensure that there is no recoverable trace of the information.

7. Personal information storage

We store your personal information in our offices in Canada, as well as in the data centres of our service providers, in Canada and in the United States. While your personal information is in the U.S., it is subject to U.S. laws, and may be subject to disclosure to the governments, courts or law

enforcement or regulatory agencies in the U.S., pursuant to applicable laws. For access to your personal information, please contact our Privacy Officer, using the contact information provided in section 11 below.

8. Access to your personal information

We acknowledge and recognize your right to access any of your personal information held by MMSM. As such, upon written request, subject to certain exceptions, MMSM will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. However, as MMSM issues scholarships in its sole and absolute discretion, it will not release or provide any applicants to its programs with information regarding the evaluation of an individual's application, except to inform the applicant whether or not their application has been accepted.

All access requests should be sent to our Privacy Officer, using the contact information provided in section 11 below.

9. Safeguards of your personal information

We make every reasonable effort to protect against the loss, misuse, and alteration of personal information under our control. In the unlikely event that a data security incident occurs, we undertake to report the breach in a timely manner to the *Commission d'accès à l'information* and to the persons whose data are affected, but only if the incident presents a risk of serious injury. We will also maintain a register of confidentiality incidents.

Personal information gathered by MMSM is kept in confidence. Reasonable safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose(s) for which it was obtained.

Where information is sent to a third party for processing, we make sure, through our contracts with them, that all customer information is kept secure.

10. Modifications to the Privacy Policy

MMSM will review its privacy policy regularly. We may modify or supplement this Privacy Policy at any time. At all times, the current privacy policy may be viewed on MMSM's website.

MMSM will obtain the necessary consents required under applicable Privacy Laws if it seeks to collect, use or disclose an individual's personal information for purposes other than those to which consent is obtained unless otherwise required or permitted by law.

11. Contact information

We have appointed a privacy officer at MMSM to address any queries, concerns or complaints you may have. Our Privacy Officer can be reached by email at privacy@mccallmacbainscholars.org or by mail at the following address:

Privacy Officer
McCall MacBain Scholarships at McGill
2202 - 1010 Sherbrooke Street West
Montreal, Quebec
Canada H3A 2R7

SCHEDULE A LIST OF SERVICE PROVIDERS

Service Providers Link to their privacy policy

Slate by Technolutions https://technolutions.com/privacy-policy

Formstack https://www.formstack.com/legal/master-services-

agreement

Salesforce https://www.salesforce.com/company/privacy/full-privacy/

Google Workspace https://policies.google.com/privacy

Dropbox https://www.dropbox.com/privacy

Mailchimp https://mailchimp.com/legal/privacy/

Zoom https://zoom.us/privacy