



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, scholars, 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 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), the *Act respecting the protection of personal information in the private sector*, CQLR c P-39.1 (Quebec), the *General Data Protection Regulation* (“**GDPR**”), EP 2016, OJ L 119 (for applicants resident of European Union), and other applicable privacy laws (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:

- A. For applicants: name, addresses, contact information (e.g., 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, original 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, photographs, endorsements and references (including endorser and referee contact details), activity verifications (including verifier contact details), criminal background checks, languages, conduct disclosures, data obtained through cookies and similar technologies, and any additional information applicants voluntarily provide to MMSM.
- B. For scholars and award recipients: 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 voluntarily provide to MMSM.
- C. Others (including members, volunteers, mentors, assessors, interviewers, donors): name, addresses, contact information (e.g., email and phone number), gender, pronouns, biography and résumé information, language proficiency, photographs, conflict of interest disclosures, records of personal communication with MMSM, dietary restrictions, data obtained through cookies and similar technologies, and any additional information voluntarily provided to MMSM.

3. Purposes of collection

MMSM collects personal information with your consent or if it is necessary for our legitimate interests, for the following purposes: to send you information that you have expressly chosen to receive; to determine an individual's eligibility and selection for MMSM's scholarships and awards; to administer MMSM's scholarships and awards; to conduct assessments related to MMSM's activities, for program planning, program evaluation, to generate statistics; to provide tax receipts, T4As and other similar documents; to establish the qualifications of MMSM's volunteers (assessors, interviewers, mentors etc.); to provide an individual or organisation 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 conduct surveys, research and evaluations.

If you are located in the European Economic Area (EEA) or the United Kingdom (UK), we will only process your data if we have one or more legal bases for doing so under the GDPR or UK GDPR. Namely, we will process your data if: you have given your consent for one or more specific purposes; it is necessary to perform a contract with you; it is necessary for our legitimate interests, and your rights do not override those interests; it is necessary to protect the vital interests of you or another natural person; or it is necessary to comply with a legal obligation. If consent is the legal basis under which we process your data, we will seek additional consent before using your data for a purpose that differs from the original purpose for which we collected it.

4. Disclosure of personal information

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

- A. To service providers: 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 processors, 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.

- B. To Headlands Institute: Headlands Institute is a Canadian non-profit organization that administers programs on behalf of MMSM.
- C. To McGill University: 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. For promotion: With your prior consent, we may disclose your personal information, on an as-needed 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.

Accordingly, 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 until it is no longer required to fulfill the purpose(s) for which it was collected, or as otherwise required or permitted by law. When personal information is disposed of by MMSM, care will be taken to ensure that there is no recoverable trace of the information.

For further information about retention periods for various categories of personal information, please contact our Privacy Officer using the contract information provided in section 11 below.

7. Personal information storage and transfers

We store your personal information in our offices in Canada, as well as in our service providers' data centres, 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. If your personal information is subject to the GDPR or UK GDPR, we protect your rights as required by law. To this end, we sign standard contractual clauses approved by the European Commission to ensure the protection of data transferred outside of the European Union, the United Kingdom, and Canada.

For access to your personal information, please contact our Privacy Officer using the contact information provided in section 11 below.

8. Personal information rights

We acknowledge and recognize your personal information rights, as provided by Privacy Legislation, including:

- A. **Access:** You may request access to your personal information held by MMSM. To note, MMSM issues scholarships at its sole and absolute discretion, and 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.
- B. **Correction:** You may request that MMSM correct any of your personal information that is inaccurate or incomplete.
- C. **Withdrawal of Consent:** You may withdraw the consent to process your personal information that you previously granted to MMSM.
- D. **Erasure and Restriction:** You may request that MMSM erase and/or restrict its processing of your personal information.
- E. **Refusal of Automated Individual Decision-Making:** Individuals in the EU may refuse the automated processing of their personal information. To note, MMSM does not use automated individual decision-making

- F. Portability: Individuals in the EU may request that their personal information be sent electronically to a third party.
- G. Lodging a Complaint: You may lodge a complaint with the relevant data protection authority if you believe we are not complying with Privacy Legislation.

All requests pertaining to exercising your personal information rights should be sent to our Privacy Officer, using the contact information provided in section 11 below. Upon written request, subject to certain exceptions provided by law, MMSM will facilitate the exercise of your personal information rights.

9. Personal information safeguards

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 will report the breach to the *Commission d'accès à l'information*, other relevant data protection authorities, and/or to the persons whose data are affected, as required by applicable law. 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. Privacy Policy modifications

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 Legislation 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. Special Provisions

Cookies and Google Analytics:

Cookies are small text files stored on your device when you access websites, as further explained at www.aboutcookies.org. MMSM uses cookies to enable basic website functions, remember your browsing preferences, understand how visitors interact with the website, and provide internet-based advertising. You may adjust your cookie preferences at any time through your browser settings. Please note that rejecting certain cookies may affect the functionality of the website.

MMSM uses Google Analytics to collect information about how visitors use our sites in order to improve our services. You can opt out of data collection by Google Analytics using the following link:

<https://tools.google.com/dlpage/gaoptout>

Special categories of data:

The EU GDPR imposes additional obligations on organisations collecting “special category data,” which includes racial or ethnic origin, political religious or philosophical beliefs, trade union membership, data concerning health, and data concerning a natural person’s sex life or sexual orientation. MMSM does not collect special category data without your explicit consent for the specified purpose(s), or as otherwise permitted or required by applicable law.

Minors:

MMSM does not knowingly collect data from persons under the age of 16 years without parental consent. If MMSM becomes aware that we have collected data from a person under the age of 16 without parental consent, we will delete it without delay.

12. 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@mccallmacbainsscholars.org or by mail at the following address:

Privacy Officer
 McCall MacBain Scholarships at McGill
 772 Sherbrooke Street West, 4th Floor
 Montreal, Quebec
 Canada H3A 1G1

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>

Zoom

<https://zoom.us/privacy>