

Equitas Privacy Policy

This privacy policy was last updated on: August 23rd, 2024

This privacy policy (“**Privacy Policy**”) sets out how Equitas – International Centre for Human Rights Education (“**Equitas**”, “**we**”, “**us**”, and “**our**”) manages, collects, uses, discloses and holds personal information about you via our website: <https://equitas.org>, <https://community.equitas.org/login/index.php> and <https://speakingrights.ca/> (collectively, the “**Websites**”) and other interactions with us. The expressions “you” and “your” refer to each and every individual whose personal information we may handle from time to time.

By submitting personal information to us, 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 our collection, use, storage, transfer, disclosure, or communication (collectively, “**processing**” or “**process**”) of your personal information at any time by contacting our Privacy Officer, whose contact information is set out below. If you refuse or withdraw your consent, we may not be able to provide or continue to provide you with services or information which may be of value to you.

Please review this Privacy Policy before providing us with your personal information, including through the use of the Websites. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT PROVIDE US WITH YOUR PERSONAL INFORMATION OR USE THE WEBSITES.

This Privacy Policy is divided into the following sections:

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1. **COLLECTION OF PERSONAL INFORMATION**

Personal information means any information which relates to a natural person and allows that person to be identified directly, or indirectly in combination with other information. It does not include personal information where all direct and indirect references to the identity of the relevant individual have been removed (i.e., anonymous personal information).

We may collect and process the following categories of personal information about you:

- **Identity personal information**, including first name, last name, job title, date of birth.
- **Contact personal information**, including email, address, postal code, and telephone numbers.
- **Financial information**, including bank account number and names.
- **Donation information**, including financial information (as defined above), date of donation, donation amounts, and credit card information for monthly donors.

- **Career profile personal information**, including your resume, cover letter, language proficiency, and other information that you choose to add to your application for one of our roles.
- **Education training application information**, including passport number.
- **Technical personal information**, including geolocation information, cookies and other technology on the devices you use to access the Websites.
- **Internet activity information**, including interactions with our Websites. In addition, we may collect information about your browsing behaviour, such as the date and time you visit the Websites, the language you browsed the Website in, the areas or pages of the Websites that you visit, the amount of time you spend viewing the Websites, the number of times you return to the Websites and other click-stream data.

If you provide Equitas with the personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect and process such personal information for the purposes set forth in this Privacy Policy.

We use different methods to collect personal information from and about you, including through:

Direct interactions.

You may give us your personal information by corresponding with us. This includes personal information you provide when you:

- Apply for a job with us;
- Contact us through a form on our Websites or by email;
- Make a donation;
- Subscribe to our newsletter;
- Work with us as an employee, consultant or a vendor;
- Provide feedback or request information; and
- Voluntarily provide us with your personal information electronically, in person or over the telephone.

Automated technologies or interactions.

We use Google Analytics as part of the analytics cookies on our Websites. Google Analytics is Google's analytical tool that helps us to understand how users engage with our Websites. The information we collect through Google Analytics is page views, time spent through the Network Services, number of visitors, the source they come from, the pages they have visited, session and Websites usage, the whole in an anonymous form. It uses a set of cookies to collect such information and reports site usage statistics without allowing us to identify individual visitors.

You can opt out of having your activity on the Websites available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

2. USING PERSONAL INFORMATION

We use your personal information for the purpose for which it was collected, any other purpose you have consented to and any other purpose permitted by law. The primary purpose for which we collect,

use and disclose personal information is to manage our operations and promote our human rights education work. This may include using your personal information for any of the following purposes:

| Purpose | Type of personal information |
|--|--|
| 1. Providing you with access to our website (https://equitas.org) | <ul style="list-style-type: none"> • Internet activity information • Technical personal information |
| 2. Providing you with access to Equitas Online educational community platform | <ul style="list-style-type: none"> • Identity personal information • Contact personal information • Internet activity information • Technical personal information |
| 3. Processing your donations and, where applicable, to issue a tax receipt. | <ul style="list-style-type: none"> • Identity personal information • Contact personal information • Donation information |
| 4. Responding to your communications or send you requested information, which may include, educational resources, newsletter updates and volunteering opportunities. | <ul style="list-style-type: none"> • Identity personal information • Contact personal information |
| 5. Processing job applications and conducting recruitment | <ul style="list-style-type: none"> • Identity personal information • Contact personal information • Career profile personal information |
| 6. Processing applications for educational trainings | <ul style="list-style-type: none"> • Identity personal information • Contact personal information • Career profile personal information |
| 7. Granting Funds through the Act Together for Inclusion Fund | <ul style="list-style-type: none"> • Identity personal information • Contact personal information • Organisational financial data |
| 8. Continuing to improve your experience with our Websites | <ul style="list-style-type: none"> • Internet activity information • Technical personal information |
| 9. Protecting against error or fraud | <ul style="list-style-type: none"> • All categories of information |
| 10. Comply with legal and auditing requirements | <ul style="list-style-type: none"> • All categories of information |
| 11. Investigate breaches of the Websites terms and conditions or the Privacy Policy | <ul style="list-style-type: none"> • All categories of information |

3. **DISCLOSURE OF INFORMATION**

We may disclose your personal information to third parties for the purposes as described above. This may include disclosing information to:

- our related entities and affiliates;
- with service providers who help us fulfil the purpose for which your personal information was collected, including server hosting providers who help us store the personal information you have provided us;
- with service providers who help us analyse the profiles and characteristics of our Websites' visitors and job applicants to better understand them;

- to comply with our obligations under any law or regulation, investigation, subpoena or order of a court, tribunal or other administrative or governmental authority;
- with law enforcement or a government institution in order to investigate fraud or potential fraud, as well as any other violation of a law, regulation, or the Websites terms and conditions, or in order to protect the rights, property, or safety of Champion Group, our customers, users, or our partners.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes; we only permit them to process your personal information for specified purposes and in accordance with our instructions.

4. CROSS-JURISDICTIONAL TRANSFERS

By providing us with personal information, you acknowledge and agree that your personal information may be transferred to other jurisdictions for processing and storage, including in servers located across Canada. Further, your personal information may be accessible to law enforcement, national security authorities, and the courts of such jurisdictions. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information.

5. SAFEGUARDS

To prevent unauthorized access or disclosure, maintain data accuracy and facilitate the appropriate use of data, Equitas uses physical, technological and administrative procedures to attempt to protect the integrity of its Websites and the confidentiality of personal information that it processes. Nevertheless, Internet transmissions are never completely private or secure. Equitas cannot be liable for any breaches of confidentiality due to system failures or unauthorized access by third parties.

6. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

Equitas only keeps personal information for as long as necessary and for the purposes it was collected, or for as long as required to comply with any applicable legal obligation and its documents retention policies. The length of time personal information is kept varies according to the nature of the information.

When the personal information collected is no longer required by Equitas, the necessary procedures for destroying, deleting, erasing, or converting it into an anonymous form are applied.

7. PROTECTION OF CHILDREN'S PERSONAL INFORMATION

The protection of children's personal information is extremely important to us. Equitas understands that it has a responsibility to protect the privacy of children.

These Websites and our recruitment program are targeted to, and intended to be used by, adults. We do not knowingly collect any information from persons under the age of 14. If we become aware that we have collected any personal information from a child under the age of 14, we will delete that information.

8. YOUR LEGAL RIGHTS

Subject to certain exceptions, as permitted by law, you have the following rights in relation to the personal information we hold about you:

Your right of access

You have the right to access the personal information we hold about you and to receive a general account of our uses of that personal information. Upon receipt of a written request from you, we will provide you with a copy of your personal information, although in certain limited circumstances, we may not be able to make all relevant personal information available to you, for example, where that personal information also relates to another individual. In such circumstances, we will, upon request, provide you with the reasons for such refusal. We will endeavour to deal with all requests for access of personal information in a timely manner.

Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. Where appropriate, such amended personal information will be provided to the parties to whom we are authorized to disclose your personal information. We will endeavour to deal with all requests for rectification of personal information in a timely manner.

Your right to withdraw consent

If we rely on your implicit or explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products, services, and information to you. We will advise you if this is the case at the time you withdraw your consent. We may use your information to send important notices or communications regarding orders or contracts for products and services we procure from you or sell to you, even if you have opted out from our marketing communications.

9. LINKS TO OTHER WEBSITES

The Websites may occasionally contain links to other sites not operated by Equitas. Equitas is not responsible for the privacy practices or the content of those websites. Please be sure to review the privacy policies of those sites.

The Websites may display links to third party sites. These links may contain cookies placed by those third parties. Equitas is not responsible for the linked websites or how such websites may use their own cookies or information. Please refer to that organization's privacy policy for further information.

10. SOCIAL MEDIA AND FORUMS

If you voluntarily submit or post any information, photographs, or other content to any Equitas forums, X pages, Facebook pages, or other social networking pages or sites, certain elements of your personal information may be automatically included in the posting, including your user name and email address,

and this information may be collected and used by others. Equitas has no control over, and is not liable for, the collection, use, or disclosure of any posted user content by users of such forums and social media networking pages. For further clarity, except with regard to Equitas forums hosted on the websites, any personal information posted, used, or disclosed via such sites is not subject to this policy.

11. **WHAT DO YOU DO IF YOU HAVE A COMPLAINT OR A QUESTION?**

If you would like further information about how we manage your personal information, have any queries or feedback relating to this Privacy Policy, or wish to lodge a complaint, you may contact the office of our Privacy Officer at:

Privacy Officer: Odette McCarthy

Address: 666 Sherbrooke Street West, Suite 1100 Montreal (QC) H3A 1E7

Tel.: 514-954-0382

Email: info@equitas.org

Our Privacy Officer is accountable for compliance with applicable privacy laws and is responsible for coordinating the investigation of any complaints and resolving privacy-related issues. The Privacy Officer will manage any complaints received in a timely manner and provide you with a response to your complaint.

You have the right to make a complaint at any time to the relevant privacy regulator. We would, however, appreciate the chance to deal with your concerns before you approach the relevant privacy regulator so please contact us in the first instance. In Canada, you can contact the Office of the Privacy Commissioner of Canada or the relevant provincial privacy commissioner for your province of residence.

12. **CHANGES TO THIS PRIVACY POLICY**

From time to time, it may be necessary for us to review and revise this privacy policy. We reserve the right to amend this privacy policy at any time and to notify you by posting an updated version of the privacy policy on our Websites or by contacting you via email, or both.