

Privacy Policy

The Surety Association of Canada (SAC) respects the privacy of our staff, members, clients, volunteers, supporters and public stakeholders who provide personal information to us. We value the trust of our stakeholders and we commit to being clear, transparent and accountable when dealing with the information that you share with us.

In delivering our programs and services, we often gather and use personal information and will carefully protect this information and will obtain consent to utilize the information for any other purpose – more details pertaining to how we protect this information is outlined in this document.

What is Personal Information?

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, that individual.

The <u>Personal Information Protection and Electronic Documents Act (PIPEDA)</u> outlines some exceptions. These include business contact information and certain publicly available information, such as names, addresses and telephone numbers that are published in directories (i.e. information on a business card).

Where a person uses his or her home contact information as business contact information, we consider that the contact information provided is business contact information and is not subject to protection as personal information.

As a national Canadian association with member companies who are located outside of North America, we are also required by the <u>Data Protection Act (DPA)</u> and the <u>General Data Protection Regulation (GDPR)</u> to explain to you why we are asking for information about you, how we intend to use the information you provide to us and whether we will share this information with anyone else.

Our Privacy Practices

SAC adheres to the following privacy practices:

- Personal information gathered by SAC is held in the strictest confidence and carefully protected.
- SAC collects data either through email communications or via the completion of an on-line submission form for specifically identified purposes. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered.
- Staff and volunteers of SAC are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.
- No more than the minimum amount of personal information will be collected in the course of providing any service.



- Individuals, including member representatives and others, have the right to "opt out" of providing certain information recognizing that in doing so, the purpose may then not be fulfilled, or SAC may not be able to provide some services to the member, non-member or individual.
- Individuals, including member representatives and others, have the right to access their own information.
 Measures are taken to ensure the integrity of this information is maintained and to prevent it from being lost or destroyed.
- Staff and volunteers of SAC receive appropriate training in the protection of personal information.
- SAC will advise all member representatives, non-members and others accessing our programs and services of our Privacy Policy:
 - o at the time they apply for company membership in SAC, or individually register for an event or educational session, or when they access a program or service.
 - o on the website in the form of an online privacy statement.
 - o at the time when major activities are undertaken by the association to gather information (e.g. events, educational session, surveys, etc.).
- SAC will not sell or rent any personally identifiable information to third parties.

Information Collection and Use

We collect, use and disclose personal information about you only for purposes that would be considered appropriate. For example, if your company applies for membership or if you, as an individual, completes and submits an event registration form or Associateship of Canadian Surety Bonding (A.C.S.B.) Program application form, or if you complete a survey that you receive from us requesting your feedback. In these instances, you may be asked to provide certain information such as your contact information (name, e-mail address and mailing address), gender, birth date, age group and other pertinent information which would aid us in being able to service you better, as well as to assist SAC in improvements or expansion of the association's services.

When you submit your personally identifiable information to SAC, you are giving your consent to the collection, use and disclosure of your personal information as set forth in this Privacy Policy. If you would prefer that we not collect any personally identifiable information from you, you can choose either to not provide this information to us or you can opt not to have this information used for any purpose other than the sole purpose for which it was explicitly collected, which will be clearly defined prior to collection of such data.

The information you provide may be used by us to create and deliver to you our e-mails, e-newsletters, or member-only communications, in compliance with the <u>Canadian Anti-Spam Legislation</u>. SAC member representatives (individuals) are required to "opt-in" to receive communications through the completion of an on-line registration form or through log-in/password access to WebPortalOne, which is directly linked to membership records that are stored in Association DNA. Member representatives (individuals) can "opt-out" at any time. For non-members, including stakeholders and others, who would like to receive on-going communications from SAC would be required to submit a request in writing via email to provide "opt-in" approval to surety [at] suretycanada.com or by email directly to a SAC staff contact (see "Contact Us" found on the SAC website at www.suretycanada.com).



SAC securely stores data on an internal server, which is backed up to an external hard drive and stored off-site in a Sentry®Safe in a secure location. In addition, membership records and event and educational session registrations are stored securely at the Canada East Azure Data Center located in Quebec City, Quebec, Canada.

What are your data protection rights?

SAC would like to make sure you are fully aware of all your data protection rights. Every individual is entitled to the following:

The right to access – You have the right to request SAC for copies of your personal data. Note that there may be a minimal fee required for this service.

The right to rectification – You have the right to request that SAC correct any information you believe is inaccurate. You also have the right to request SAC to complete the information you believe is incomplete.

The right to erasure – You have the right to request that SAC erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that SAC restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to SAC's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that SAC transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you would like to exercise any of these rights to access, modify or remove your personal information, please contact us by email at surety [at] suretycanada.com and we will gladly accommodate your request. If you make a request, we have 30 (thirty) days to respond to you.

Cookies and Log Files

We may place a "cookie" on your computer's hard drive so we can recognize you as a return user and personalize your experience. A cookie is a piece of data that enables us to track and target your preferences. The cookie will be stored on your computer's hard drive until you remove it. You can have your browser notify you of, or automatically reject, cookies. If you reject our cookie, you may still use our website, but you may be limited in the use of some of the features. Some of our partners, supporters, or members may also use cookies on our website. However, we have no access to, or control over, these cookies and do not accept any responsibility for such use.

When you visit the SAC website or view one of our e-mails and/or e-newsletters we may use tags, tracking links and/or similar technology to note some of the pages you visit on our website and to personalize your experience. We may also use tags to determine what types of e-mail your browser supports. Note that we may use the information collected



through tags, tracking links and similar technology in combination with your personally identifiable information for internal business purposes, such as to analyze trends, administer our website, track traffic patterns, and gather demographic information for aggregate use. In addition, this information may be used to help develop strategic marketing plans to guide us in the advancement for the use of the SAC's website and the programs and services we provide.

We may collect, store or accumulate certain non-personally identifiable information concerning your use of this website, such as information regarding which of our pages are most popular. We may disclose any information, including personally identifiable information, we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request.

External Links

The SAC website may contain links to or from other websites. Please be aware that we are not responsible for the privacy practices of other websites. This Privacy Policy applies only to the information we collect on the SAC website (www.suretycanada.com). We encourage you to read the Privacy Policies of other websites you link to from our website or otherwise visit.

Notification of Changes

We may revise this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post the revised policy on our main website (www.suretycanada.com). As we may make changes at any time without notifying you, we suggest that you periodically consult the most current version of our Privacy Policy. Please note that our rights to use your personally identifiable information will be based on the Privacy Policy in effect at the time the information is used.

Further Information

We have taken great measures to ensure that your visit to our website is an excellent one and that your privacy is constantly respected in any and all interactions that you may have with SAC. If you have any questions, comments or concerns about our privacy practices, please contact us by phone at (905) 677-1353 or by email to surety [at] suretycanada.com.

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