

Network and Registered User Privacy Policy

The purpose of the Network Use and Registered User Privacy Policy is to describe to you the privacy and security of your personal information as a Registered User of the *Connecting Windsor-Essex™* Portal (the Portal) and/or WEDnet™. The Participants of *Connecting Windsor-Essex™* are committed to safeguarding your privacy as a Registered User. This policy discloses how Participants and third-parties may gather and use information while you access the online services that are available to you through the Portal using WEDnet™. This Privacy Policy should be reviewed in conjunction with the Portal Acceptable Use Policy and Agreement (AUP).

Personal information is required for two main reasons that include to:

- 1) Create a more personalized online experience, and or
- 2) Demonstrate to those that administer the Portal that you are reliably authenticated as a Registered User and not an impostor. This is often referred to as identification and authentication.

By using the Portal's collaboration applications (e.g. SameTime™ or WorkPlace™), or the search engine on the site, you consent to the collection, use and disclosure of your information, as described herein. This Privacy Policy may change from time to time, so please check back periodically.

This Privacy Policy will explain the following regarding your access to and use of the Portal:

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1. **What personal identifying information (and other information) is collected from you, and why?**

In order to provide on-line access to Portal services, two types of information are collected from Registered Users, including: a) personally identifiable information, and b) non-personal information. The primary goal in collecting personal information from you is to provide you with an easier and more efficient access to the Portal, as a Registered User that is authenticated with a login and password for access, an individualized approach to the Portal.

The Participants in the *Connecting Windsor-Essex™* project adhere to the principles of the Personal Information Protection and Electronic Document Act (PIPEDA), as well as any applicable laws in the Province of Ontario. These principles include, but are not limited to the following:

- **Accountability:** *Connecting Windsor-Essex™* Participants are responsible for information under their control and shall designate an individual or individuals who are accountable for the organization's compliance with this Privacy Policy, which includes ensuring that comparable levels of protection are in place in third party organizations used to process personal information. Responsibility for protecting personal information remains with those parties that collect the information whether Participants to the Portal or third-parties.
 - **Informed Purpose:** Personal information is collected for a purpose that shall be identified by *Connecting Windsor-Essex™* Participants at or before the time the information is collected, and consent for the specific purpose of use will be obtained for any new use, except where such use is required by law
 - **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of their personal information, except where required by law.
 - **Limit of Collection:** The collection of personal information shall be limited to the amount and type necessary for the purposes identified by Participants of *Connecting Windsor-Essex™*, and the information shall be collected by fair and lawful means.
 - **Use, Disclosure and Retention:** Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
 - **Accuracy:** Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is being used.
 - **Safeguards:** Personal information shall be protected by security safeguards that include the physical, organizational and technological measures appropriate to the sensitivity of the information. This includes the methods used to destroy personal information.
 - **Openness:** *Connecting Windsor-Essex™* shall make readily available to individuals, specific information about its policies and practices relating to the management of personal information.
 - **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
 - **Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for compliance. You should make your request for access to information to the Security Manager for *Connecting Windsor-Essex™*, who serves also as the Privacy Officer.
- a) **Personal identifiable and/or Sensitive Information.** The Portal collects personal identifiable information including, but not limited to: name and a user selected password/passphrase or shared secret. Participants in *Connecting*

Windsor-Essex[™] reserve the right to request your address, phone number, e-mail address information, or other information should it be required for assisting in providing additional services within the Portal. Other information could include:

- demographic information, including, but not limited to, age range or birthdate, household size, income level, education level and gender,
- financial information including, but not limited to, credit card information,
- personal use or user profile information including, but not limited to, reason for use of the Portal, reason for use of specific computer applications, and topics of interest to you,
- employee information that identifies you to a Participant organization and permits certain aspects of your identity to be verified as a Registered User

b) Non-Personal Information. This refers to information that cannot be traced back to you as a specific, identifiable individual. The Portal automatically gathers certain information based upon your usage. The Portal may also collect computer machine data such as computer processor type, processor speed, operating system type, browser type, audio devices, modem devices and video cards. This information may include the web site's Uniform Resource Locator ("URL") that you just came from, which URL you next go to, what browser you are using, and your Internet Protocol ("IP") address. This information is the type of information that is compiled and analyzed periodically. For instance, it may be interesting for us to know that many thousands of users visited this Privacy Policy today, but not the names or addresses of users. The users remain anonymous. Participants in the *Connecting Windsor-Essex*[™] can also use this information to do internal research on our visitors' demographics, interests and behaviour to better understand and serve user needs. Some of the information may be used to assess the quality of your access to the Portal.

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2. Where is personal information collected?

- The Portal collects personal information as part of the user login page. Technical information may also be collected, including: the referring Uniform Resource Locator ("URL"), your Internet Protocol ("IP") address, which browser software you used to come to the Portal and the pages of the Portal that you viewed during your visit. The URL is the global address of documents and other resources on the World Wide Web. An IP address is an identifier for a computer or device on a TCP/IP network. TCP/IP stands for "Transmission Control Protocol/Internet Protocol," and is the suite of communications protocols used to connect hosts on the Internet. Networks using the TCP/IP protocol route messages based on the IP address of their destination.
- **Community Connector**[™] During the login process for use of the Portal *Community Connector*[™] collaboration software computer programs, the Portal may ask you to provide personal information, demographic and other information as mentioned above. The information that you provide during the registration process may be placed in your User profile, and be stored as a directory of user information, which serves as a record for your future access of the Portal. This is required so that we know that you have returned to the Portal and want to login

again, so that the software will already know who you are by your user profile. This is referred to as authentication. You may access or change your User profile by editing it yourself, after you have logged in and been authenticated. You are solely responsible for keeping your User profile information up to date. In addition, you may be asked to provide other personal identifying information sole purpose of determining identity. The process of encryption of your personal information and its storage in an unreadable form is a safeguard of your privacy used to protect the transmission and storage of your personal information. You may access your personal information at any time. See the section below entitled: "**How may you access or update your information?**"

While you are using the Portal, information regarding the web sites you visit, and the interactions with those sites, may be recorded. Some of the details of your visits are recorded in our records so that you can have an individualized experience in the use of the Portal upon a return visit. This information is stored in the form of an electronic library or database of categories and, in some cases, at locations that have specific URLs or IP addresses. We may also use your IP address to help diagnose problems with access to the Portal servers and software, and to administer your access to one or more aspects of the available resources.

- **Online Surveys and Contests.** When you participate in an online survey or interactive poll, you may be asked for demographic information (like your Postal Code, age range or income level) and perhaps your hobbies and interests in order to better serve future users. When you enter a contest or other promotional feature, you may also be asked for contact information (like your e-mail address) and demographic information (like your Postal Code, age range, or income level) in order to administer the contest and notify winners, or to better serve future contests or promotions.
- **Contact Information and Third Party Data.** If you contact Participants by e-mail or letter, they may keep a record of your personal correspondence. Thus, if you report a problem with the Portal, it may be in a file specific to you. Additionally, if other users or third parties send us correspondence about your activities or postings on the Portal, the information may be kept in a file specific to you.

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3. **How is your personal information used?**

The Participants in *Connecting Windsor-Essex™* use the information collected to provide you with access, and so that it is known who is accessing the Portal, and when they are accessing it. Research on the Portal will keep all users as anonymous users, but may include some of the demographic, and other user information collected to better meet the needs of any research studies. This research is analyzed and used to better serve you. Your name, email address or other personal information will not be released publicly, or sold to any third parties. However, Participants in *Connecting Windsor-Essex™* may provide non-personal information collected from you to advertisers and partners.

- **Connecting Windsor-Essex™ Portal.** Personal identifiable information and other information are collected as part of registration and authentication process. If you request general information from *Connecting Windsor-Essex™* regarding services or other information, then information will be collected from you in order to respond to your request. All users may have information collected regarding referring URL, your IP address, which browser you used to come to the site and the pages of the Portal that you viewed during your visit. This information is used to better understand the habits and methods of users to access the Portal and how to better serve the needs of our users.
- **Connecting Windsor-Essex™ Application Services.** The Portal uses personal identifiable information to confirm or clarify submitted information and to provide users with updated information about the Portal. Demographic and other information is used to tailor a user's experience of their visit to the site, such as by displaying content that might be of interest to specific users. No personal identifiable information about any Registered User will be released to a third party unless the user consents to the disclosure, or except as may be required by law. **Connecting Windsor-Essex™ Contact Form.** Information will not be shared with any third party without the consent of the user, or except as may be required by law. *Connecting Windsor-Essex™* may share non-personal information collected on this form with Participants and the general public.
- **Online Surveys and Contests.** Participants in *Connecting Windsor-Essex™* may conduct surveys in order to provision your user content requests and to better understand users' needs and opinions. Survey responses containing personal identifiable information about individuals will not be shared with any third party without your prior consent. Non-personal information collected from surveys may be shared among Participants and with the general public. The Portal may have contests, sweepstakes and other promotions on its site, in which entrants may be asked to provide personal or contact information. In some cases, entrants may be required to answer survey questions about a range of topics. Personal information collected in entry forms to verify the entrant's identity, age and to communicate with entrants, but this information will not be shared any of third party, unless request for disclosure and consent has been obtained at the time of entry, if you are a contest winner or as may be required by law. Participants in the *Connecting Windsor-Essex™* project will not knowingly permit children under 13 to participate in contests.
- **Contact Information and Third Party Data.** This information will be used to respond to your inquiries, and to enable Participants to verify that you have contacted them.

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4. Who is collecting your personal information?

Information is collected from you while you are using the Portal, and/or if a request for personal information, it will be collected with your consent. Some of the capability of your use of the Portal may be provided in conjunction with named Participant organizations in the *Connecting Windsor-Essex™* project.

When you access resources at named third party sites through portlets, and you are authenticated for access to specific information at the site, personal information may be shared with project Participants. If any third party is collecting personal information (other than those collecting information on *Connecting Windsor-Essex™*'s behalf), you must be notified prior to the time of collection of information by the third party as required by law. Participants in *Connecting Windsor-Essex™* reserve all rights to reference, recommend or provide URL or IP address access to third party web sites. None of the Participants in *Connecting Windsor-Essex™* are responsible for the third party web sites in any way whatsoever, including the information content and/or user impact as a result of visiting third party sites. You alone are responsible for reviewing and agreeing to the Privacy Policies posted on third party sites accessible through portlets. Please be aware that we do not control, nor are we responsible, implied or otherwise, for the Privacy Policies or information practices of third parties or their web sites. If you do not want to have your personal identifiable information shared with a named Participant in the Portal, you can choose not to access the resources and/or not to use the service to information provided by the named Participant.

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5. With who is personal information shared?

Generally, your personal identifiable information will not be disclosed to any third party except when your consent has been obtained or when it is required to disclose it pursuant to a court order, or by other law. Participants in *Connecting Windsor-Essex™* reserve all rights to transmit your credit card number and other credit card verification information through a third party service provider to the appropriate credit card company during order processing. Third party service providers will have their agreed upon confidential restrictions and security measures to safeguard your information. We work to protect the security of your information during transmission by encryption software, which secures personal information, such as your name and password/passphrase or shared secret. The Participants in *Connecting Windsor-Essex™* will not knowingly disclose personal identifying information of children under 13 to any third party.

The Participants in *Connecting Windsor-Essex™* do not monitor in advance user communication, e-mails or content distributed through the use of the Portal. By using any aspect of the Portal, you as a Registered User acknowledge that owners of hardware, software, administrators of the Portal and others, are unlikely to be aware of violations of law or other misconduct by other users. As a Registered User of the Portal, you maintain full and sole responsibility for information sent via e-mail, and downloaded using your web browser. Participants in *Connecting Windsor-Essex™* may be required by law, court order, governmental agency or law enforcement authority to disclose a user's personal information that may include e-mail information temporarily residing on our servers

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6. How may you access or update your personal information?

The information you provide during registration for access to *Connecting Windsor-Essex™* is placed in a User profile. You may access or update your user information at any time by choosing to edit the information yourself. You are responsible for the accuracy of your information and the Participants in *Connecting Windsor-Essex™* assume that your information is accurate by giving you the ability to edit it at any time to maintain it as accurate. The Participants in *Connecting Windsor-Essex™* reserve the right to perform reviews of the information to assist in verifying that it is accurate.

To access or update your Personal Information: You should request changes to your personal information by contacting the Security Manager, or to request a copy of any files of your personal information, other than what is available on line from the user directory be made available to you. You can edit information available on online to make it more accurate, or request in writing to *Connecting Windsor-Essex™* regarding information on file as a hard copy be updated. There is no charge to request or receive your personal information stored in the on-line user directory.

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7. How is your personal information protected?

The Portal employs secure systems to protect the information received from users. In addition, the information in your User profile is password-protected so that only you as a user, and authorized *Connecting Windsor-Essex™* Portal Managers may access or change the information. You should not share your password/passphrase or shared secret with anyone. *Connecting Windsor-Essex™* Portal Managers will never ask you to divulge your password/passphrase or shared secret. You may be asked for your password/passphrase or shared secret when you contact us and only in cases where you request assistance to correct a service problem. Please be aware that Internet data transmission is not always 100% secure and no-one can warrant that the personal information you transmit over the Internet is 100% secure. Because security is important to all of us, reasonable efforts are made to ensure the security of our systems, and your access to use the Portal.

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8. Privacy of children aged 13 to 18.

Participants in *Connecting Windsor-Essex™* may collect, use, and disclose information about children aged 13 to 18 in the same manner as adults. Participants believe that it's especially important to protect children's privacy online and encourages parents and other legal guardians to spend time online with their children to participate and monitor their Internet activity. If you are under 18, we recommend you get your parent's or legal guardian's permission before disclosing any information about yourself to anyone on the Internet. The Portal does not filter information or other content that children or other users may be exposed to, and you could obtain content and materials from the Internet

and/or advertising sources at any time from the Internet that are inappropriate for children. Users should consider third party parental control software that is available to you as a user from a number of sources, and for the installation on your computer to provide added assurances of online privacy of children aged 13 to 18

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9. Notice to parents of children under the age of 13.

In the attempt to provide a secure on-line experience for children under the age of 13, Participants in *Connecting Windsor-Essex™* will not knowingly allow children under the age of 13 to become Registered Users of the Portal without parental consent. As part of the registration process for access to the Portal, and where personal information is collected for registration and authentication, all users under the age of 13 are required to obtain parental consent prior to obtaining registered access to resources online in the Portal. Children's personal information will not be disclosed to third parties. We have designed a Parental Consent Form to allow parents to easily provide their consent. Registration may also be completed online by a parent with authentication to resources, prior to use by a child under the age of 13.

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10. Knowing who to contact!

In order to make an informed decision about giving personal information, including parental consent, please contact the Portal Security Manager, or the Project Officer for *Connecting Windsor-Essex™*. You may also contact a Portal Manager for one of the Theme Areas of the Portal, or a Portal Application Manager, associated with applications that you may use most frequently within the Portal.

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11. Other information about your privacy while visiting and using the Portal.

The Portal collects information regarding your interactions with the Portal software during your online sessions. Information is collected both from Visitors and from Registered Users. This includes information about when you first registered and authenticated, and what you may have accesses to in the Portal (e.g. Community Connector™), which buttons a user clicked on and other interactions that you performed when you were on the site. User information may also be monitored as you request information throughout your online session, including which web sites that you visited while using the Portal.

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12. Acceptance of the Registered User Privacy Policy

This Privacy Policy is incorporated into and subject to the terms of the Acceptable Use Policy and Agreement and it is subject to your acknowledgement and understanding. When you accept the Acceptable Use Policy and Agreement, you are also accepting this Registered User Privacy Policy. It is accepted by you as an agreed upon Policy of users of the Portal and this constitutes a legal agreement between you and the Participants in the *Connecting Windsor-Essex™* Portal. Each time that you use the Portal, you signify to all users that you have read, understood and agree to be bound by the Acceptable Use Policy and Agreement, which incorporates this Registered User Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy, please do not provide us with any information and do not use the *Connecting Windsor-Essex™* Portal. Your continued use of the Portal in light of any changes to this Privacy Policy will signify your acceptance of the changes. *If you do not agree to the Acceptable Use Policy and Agreement, then do not use the Portal as you do not have permission to do so.*

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