

At Milton Community Resource Centre trust is our #1 value. This Milton Community Resource Centre Privacy Statement ("Privacy Statement") describes our privacy practices. Please read this Privacy Statement carefully to learn how we collect, use, share and otherwise process information relating to individuals ("Personal Data"), and to learn about your rights and choices regarding our processing of your Personal Data.

A reference to "MCRC," "we," "us" or the "Company", "Organization" is a reference to Milton Community Resource Centre.

## **1. Processing activities covered**

This Privacy Statement applies to the processing of Personal Data collected by us when you:

- Visit our websites that display or link to this Privacy Statement;
- Visit our branded social media pages;
- Visit our offices
- Receive communications from us, including emails, phone calls, texts or fax;
- Register for our events, webinars or contests; or
- Participate in community and open source development.

Our websites may contain links to other websites, applications and services maintained by third parties. The information practices of such other services, or of social media networks that host our branded social media pages, are governed by third parties' privacy statements, which we encourage you to review to better understand those third parties' privacy practices.

## **2. Responsible MCRC entity**

MCRC is the controller of your Personal Data as described in this Privacy Statement, unless expressly specified otherwise.

## **3. What Personal Data do we collect?**

### **3.1 Personal Data we collect directly from you**

The Personal Data that we collect directly from you includes the following:

- If you express an interest in obtaining additional information about our services, request customer support, use our "Contact Us" or similar features, register to use our websites, sign up for an event, webinar or contest, or download certain content, we may require that you provide

to us your contact information, such as your name, job title, company name, address, phone number, email address or username and password;

- If you make purchases via our websites or register for an event or webinar, we may require that you provide to us your financial and billing information, such as billing name and address, credit card number or bank account information;
- If you attend an event, we may upon your consent scan your attendee badge, which will provide to us your name, title, company name, address, country, phone number and email address;
- If you register for an online community that we host, we may ask you to provide a username, photo and/or biographical information, such as your occupation, social media profiles, company name and areas of expertise;
- If you use and interact with our websites, we automatically collect log files and other information about your device and your usage of our websites through cookies, web beacons or similar technologies, such as Internet Protocol (IP) addresses or other identifiers, which may qualify as Personal Data (please see the "What device and usage data we process" section, below); and
- If you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, company name and time and date of arrival.

If you provide to us or to our service providers any Personal Data relating to other individuals, you represent that you have the authority to do so and permit us to use the Personal Data in accordance with this Privacy Statement. If you believe that your Personal Data has been provided to us improperly, or to otherwise exercise your rights relating to your Personal Data, please contact us by using the information in the "Contacting us" section, below.

#### **4. What device and usage data we process**

We use common information-gathering tools, such as log files, cookies, web beacons and similar technologies to automatically collect information that may contain Personal Data from your computer or mobile device as you navigate our websites or interact with emails we have sent to you.

##### **4.1 Log Files**

As is true of most websites, we gather certain information automatically via log files. This information may include your IP address (or proxy server), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information and date/time stamps associated with your usage. This information is used to analyze overall trends, to help us provide and improve our websites and to guarantee their security and continued proper functioning. We also collect IP addresses from users when they log into our services as part of our security features.

##### **4.2 Cookies, web beacons and other tracking technologies**

We use cookies and similar technologies such as web beacons, tags and JavaScript alone or in conjunction with cookies to compile information about the usage of our websites and interaction with emails from us.

When you visit our websites, we or an authorized third party may place a cookie on your browser, which cookie collects information, including Personal Data, about your online activities over time and across different sites. Cookies allow us to track overall usage, determine your browsing preferences and improve and customize your browsing experience.

We use both session-based and persistent cookies. Session-based cookies exist only during one session and disappear from your computer when you close your browser or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but choosing to disable cookies may limit your use of certain features or functions on our websites and services.

We also use web beacons on our websites and in email communications. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to one of our websites. Such technologies are used to operate and improve our websites and email communications.

The following describes how we use different categories of cookies and similar technologies and your options for managing the data collection settings of these technologies:

Type of Cookies	Description	Managing Settings
Required cookies	<p>Required cookies enable you to navigate our websites and use their features, such as accessing secure areas of the websites.</p> <p>If you have chosen to identify yourself to us, we may place on your browser a cookie that allows us to uniquely identify you when you are logged into the websites and to process your online transactions and requests.</p>	<p>Because required cookies are essential to operate the websites, there is no option to opt out of these cookies.</p>
Functional cookies	<p>Functional cookies allow us to remember information you have entered or choices you make (such as your username, language and region) and provide enhanced, personalized features.</p> <p>Functional cookies may also be used to improve how our websites function and to help us provide you with more relevant communications, including marketing communications. These cookies collect information about how our websites are used, including which pages are viewed most often.</p> <p>We may use our own technology or third-party technology to track and analyze usage information to provide enhanced interactions and more</p>	<p>You can manage the placement of functional cookies on your browser via your individual browser settings. Note that opting out of functional cookies may impact the functionality of our websites and degrade your user experience.</p> <p>To opt out from data collection by Google Analytics, you can download and install a browser add-on, which is available here.</p> <p>To learn how to control functional cookies via your individual browser</p>

	<p>relevant communications, and to track the performance of our advertisements.</p> <p>In particular, we use Google Analytics ("Google Analytics"), a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses cookies to help us analyze how our websites are used, including the number of visitors, the websites from which visitors have navigated to our websites, and the pages on our websites to which visitors navigate. This information is used by us to improve our websites.</p> <p>MCRC may also utilize HTML5 local storage or Flash cookies for the above-mentioned purposes. These technologies differ from browser cookies in the amount and type of data they store, and how they store it.</p>	<p>settings, click here.</p> <p>To learn how to manage privacy and storage settings for Flash cookies, click here.</p>
<p>Targeting or Advertising cookies</p>	<p>We sometimes use cookies delivered by us or by third parties to show you ads for our products that we think may interest you on devices you use and to track the performance of our advertisements. For example, these cookies collect and remember information such as which browsers have visited our websites. The information provided to third parties does not include Personal Data, but this information may be re-associated with Personal Data after the third party receives it.</p> <p>MCRC also contracts with third-party advertising networks that collect IP addresses and other information from web beacons on our websites, from emails and on third-party websites.</p> <p>Advertising networks follow your online activities over time and across different websites or other online services by collecting device and usage data through automated means, including through the use of cookies. These technologies may recognize you across the different devices you use, such as a desktop or laptop computer, smartphone or tablet.</p> <p>Third parties use this information to provide advertisements about products and services tailored to your interests. You may see their advertisements on other websites or mobile applications on any of your devices. This process also helps us manage and track the effectiveness of our marketing efforts.</p>	<p>See Section 4.3, below, to learn more about these and other advertising networks and your ability to opt out of collection by certain third parties.</p>

#### 4.3 Notices on behavioral advertising and opt-out

As described above, we or third parties may place or recognize a unique cookie on your browser when you visit our websites for the purpose of serving you targeted advertising (also referred to as “online behavioral advertising” or “interest-based advertising”). To learn more about targeted advertising and advertising networks and about your ability to opt out of collection by certain third parties, please visit the opt-out pages of the Network Advertising Initiative, [here](#), and the Digital Advertising Alliance, [here](#).

To manage the use of targeting or advertising cookies on this website, consult your individual browser settings for cookies. To learn how to manage privacy and storage settings for Flash cookies, [click here](#). Various browsers may also offer their own management tools for removing HTML5 local storage.

#### 4.4 Opt-Out from the collection of device and usage data

You may opt-out from the collection of device and usage data (see the "What device and usage data we process" section, above) by managing your cookies at the individual browser level. In addition, if you wish to opt-out of interest-based advertising [click here](#) (or, if located in the European Union, [click here](#)). Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, you may not be able to take full advantage of the websites.

While some internet browsers offer a “do not track” or “DNT” option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard that has been adopted by industry groups, technology companies or regulators. Therefore, we do not currently commit to responding to browsers' DNT signals with respect to our websites. MCRC takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

#### 4.5 Social Media Features

Our websites may use social media features, such as the Facebook “like” button, the “Tweet” button and other sharing widgets (“Social Media Features”). You may be given the option by such Social Media Features to post information about your activities on a website to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by the respective social media network or hosted directly on our website. To the extent the Social Media Features are hosted by the respective social media networks, the latter may receive information that you have visited our website from your IP address. If you are logged into your social media account, it is possible that the respective social media network can link your visit of our websites with your social media profile.

MCRC also allows you to log in to certain of our websites using sign-in services such as Facebook Connect. These services will authenticate your identity and provide you the option to share certain Personal Data with us such as your name and email address to pre-populate our sign-up form.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing the relevant Social Media Features.

#### 4.6 Telephony log information

If you use certain features of our services on a mobile device, we may also collect telephony log information (like phone numbers, time and date of calls, duration of calls, SMS routing information and types of calls), device event information (such as crashes, system activity, hardware settings, browser

language), and location information (through IP address, GPS, and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers).

## **5. Purposes for which we process Personal Data and the legal basis on which we rely**

We collect and process your Personal Data for the purposes and on the legal bases identified in the following:

- **Providing our websites:** We process your Personal Data to perform our contract with you for the use of our websites and to fulfill our obligations under applicable terms of use/service; where we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and administer our websites and to provide you with content you access and request (e.g., to download content from our websites);
- **Promoting security of our websites:** We process your Personal Data by tracking use of our websites, creating aggregated, non-personal data, verifying accounts and activity, investigating suspicious activity and enforcing our terms and policies, to the extent this is necessary for our legitimate interest in promoting the safety and security of the systems and applications used for our websites and in protecting our rights and the rights of others;
- **Managing user registrations:** If you have registered for an account with us, we process your Personal Data by managing your user account for the purpose of performing our contract with you according to applicable terms of service;
- **Handling contact and user support requests:** If you fill out a “Contact Me” web form or request user support, or if you contact us by other means, we process your Personal Data to perform our contract with you and to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you;
- **Managing event registrations and attendance:** We process your Personal Data to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you, to perform of our contract with you;
- **Managing contests or promotions:** If you register for a contest or promotion, we process your Personal Data to perform our contract with you. Some contests or promotions have additional rules containing information about how we will process your Personal Data;
- **Managing payments:** If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you;
- **Developing and improving our websites:** We process your Personal Data to analyze trends and to track your usage of our websites and interactions with our emails to the extent it is necessary for our legitimate interest in developing and improving our websites and providing our users with more relevant and interesting content;

- Registering office visitors: We process your Personal Data for security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices and our confidential information against unauthorized access.
- Displaying personalized advertisements and content: We process your Personal Data to conduct marketing research, advertise to you, provide personalized information about us on and off our websites and to provide other personalized content based upon your activities and interests to the extent it is necessary for our legitimate interest in advertising our websites or, where necessary, to the extent you have provided your prior consent (please see the "Your rights relating to your Personal Data" section, below, to learn how you can control how the processing of your Personal Data by MCRC for personalized advertising purposes);
- Sending marketing communications: We will process your Personal Data to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS, or push notifications) about us and our affiliates and partners, including information about our products, promotions or events as necessary for our legitimate interest in conducting direct marketing or to the extent you have provided your prior consent (please see the "Your rights relating to your Personal Data" section, below, to learn how you can control the processing of your Personal Data by MCRC for marketing purposes);
- Complying with legal obligations: We process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes or to respond to lawful requests.

Where we need to collect and process Personal Data by law, or under a contract we have entered into with you, and you fail to provide the required Personal Data when requested, we may not be able to perform our contract with you.

## **6. Who do we share Personal Data with?**

We may share your Personal Data as follows:

- With our contracted service providers, who provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment for the purposes and pursuant to the legal bases described above; such service providers comprise companies located in the countries in which we operate.
- If you use our websites to register for an event or webinar organized by one of our affiliates, with the affiliate to the extent this is required on the basis of the affiliate's contract with you to process your registration and ensure your participation in the event; in such instances, our affiliate will process the relevant Personal Data as a separate controller and will provide you

with further information on the processing of your Personal Data, where required.

- If you attend an event or webinar organized by us, or download or access an asset on our website, with sponsors of the event. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your information will be subject to the sponsors' privacy statements. If you do not wish for your information to be shared, you may choose to not opt-in via event/webinar registration or elect to not have your badge scanned, or you can opt-out in accordance with Section 10 below;
- With sponsors of contests or promotions for which you register;
- With third-party social media networks, advertising networks and websites, which usually act as separate controllers, so that MCRC can market and advertise on third party platforms and websites;
- In individual instances, with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in countries in which we operate who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data;
- With affiliates within the MCRC corporate group and companies that we acquire in the future when they are made part of the MCRC corporate group, to the extent such sharing of data is necessary to fulfill a request you have submitted via our websites or for customer support, marketing, technical operations and account management purposes.
- If we are involved in a merger, reorganization, dissolution or other fundamental corporate change, or sell a website or business unit, or if all or a portion of our business, assets or stock are acquired by third party, with such third party. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of Personal Data to an unaffiliated third party.

Any Personal Data or other information you choose to submit in communities, forums, blogs or chat rooms on our websites may be read, collected and used by others who visit these forums, depending on your account settings.

For further information on the recipients of your Personal Data, please contact us by using the information in the "Contacting us" section, below.

## **7. International transfer of information collected**

Your Personal Data may be collected, transferred to and stored by us in Canada and by our affiliates in other countries where we operate.

Therefore, your Personal Data may be processed outside the EEA, and in countries which are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection in the EEA. In this event, we will ensure that such recipient offers an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of data as



approved by the European Commission (Art. 46 GDPR), or we will ask you for your prior consent to such international data transfers.

## **8. Children**

Our websites are not directed at children. We do not knowingly collect Personal Data from children under the age of 16. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us by using the information in the “Contacting us” section, below, and we will take steps to delete such Personal Data from our systems.

## **9. How long do we keep your Personal Data?**

We may retain your Personal Data for a period of time consistent with the original purpose of collection (see the "Purposes for which we process Personal Data and the legal bases on which we rely" section, above). We determine the appropriate retention period for Personal Data on the basis of the amount, nature and sensitivity of your Personal Data processed, the potential risk of harm from unauthorized use or disclosure of your Personal Data and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your Personal Data will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of such data.

For further information on applicable data retention periods, please contact us by using the information in the “Contacting us” section, below.

## **10. Your rights relating to your Personal Data**

### **10.1 Your rights**

You have certain rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws and, in particular, if you are located in the EEA, these rights may include:

- To access your Personal Data held by us (right to access);
- To rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete (right to rectification);
- To erase/delete your Personal Data, to the extent permitted by applicable data protection laws (right to erasure; right to be forgotten);
- To restrict our processing of your Personal Data, to the extent permitted by law (right to restriction of processing);

- To transfer your Personal Data to another controller, to the extent possible (right to data portability);
- To object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- Not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"). Automated Decision-Making currently does not take place on our websites; and
- To the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

## 10.2 How to exercise your rights

To exercise your rights, please contact us by using the information in the "Contacting us" section, below. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you in order to honor your request.

To update your billing information, discontinue your account and/or request return or deletion of your Personal Data and other information associated with your account, please contact us by using the information in the "Contacting us" section, below.

## 10.3 Your rights relating to Customer Data

As described above, we may also process Personal Data in the role of a processor. If your data has been submitted to us by an MCRC partner and you wish to exercise any rights you may have under applicable data protection laws, please inquire with the applicable partner directly. Because we may only access a partner's data upon instruction from that partner, if you wish to make your request directly to us, please provide to us the name of the MCRC partner who submitted your data to us. We will refer your request to that partner, and will support them as needed in responding to your request within a reasonable timeframe.

## 10.4 Your preferences for email and SMS marketing communications

If we process your Personal Data for the purpose of sending you marketing communications, you may manage your receipt of marketing and non-transactional communications from us by clicking on the "unsubscribe" link located on the bottom of our marketing emails, by replying or texting 'STOP' if you receive SMS communications or by turning off push notifications on our apps on your device. Additionally, you may unsubscribe by contacting us using the information in the "Contacting us" section, below. Please note that opting out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as communications about your subscriptions or event registrations, service announcements or security information.

## 10.5 Your preferences for telemarketing communications

If you want your phone number to be added to our internal Do-Not-Call telemarketing register, please contact us by using the information in the “Contacting us” section, below. Please include your first name, last name, company and the phone number you wish to add to our Do-Not-Call register.

Alternatively, you can always let us know during a telemarketing call that you do not want to be called again for marketing purposes.

## **11. Security**

We take precautions including organizational, technical and physical measures to help safeguard against the accidental or unlawful destruction, loss, alteration and unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices and signing out of websites after your sessions. If you have any questions about the security of our websites, please contact us by using the information in the “Contacting us” section, below.

## **12. Changes to this Privacy Statement**

We will update this Privacy Statement from time to time to reflect changes in our practices, technologies, legal requirements and other factors. If we do, we will update the “effective date” at the top of this Privacy Statement. If we make an update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our website or by contacting you using the email address you provided.

We encourage you to periodically review this Privacy Statement to stay informed about our collection, processing and sharing of your Personal Data.

## **13. Contacting us**

To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Statement or our privacy practices please fill out this form or mail us at:

Milton Community Resource Centre  
410 Bronte Street South  
Milton, ON  
L9T 0H8

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in the EEA, you have the right to lodge a complaint with the competent supervisory authority.