

## **WEBSITE PRIVACY STATEMENT**

This Privacy Statement was last updated on September 2018.

### **General Information**

The Ottawa Gay Men's Wellness Initiative, operating as MAX Ottawa ("MAX") respects the privacy of those we interact with. We recognize the need for appropriate protections and management of your personal information that you provide to us. MAX has established this Privacy Statement to assist you to understand what information we collect, how that information is used, and our relationships with the third parties who may have access to this information.

This Privacy Statement applies to the collection, use and disclosure of personal information in respect of the use of any website maintained by MAX, including the MAXOttawa.ca website (the "Site").

### **What is personal information?**

Personal Information is information that can be used to identify or contact a specific individual, such as a name, address, phone number or email address. Personal Information also encompasses personal health information, such as any medical records and other information about your health.

### **Consent**

You agree that we may collect, use and disclose your personal information in accordance with this Privacy Statement.

MAX will collect, use and disclose your personal information without your consent only in limited circumstances as permitted by law. For example, personal information may be used or disclosed without consent for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual. In certain limited circumstances, we may be called upon to release your personal information in response to a court order, subpoena, search warrant, law or regulation. We plan to cooperate in responding to such requests, taking appropriate measures to ensure that the requester understands the sensitive nature of the personal information that they may receive.

Other than described above, we will not collect, use or disclose your personal information for new purposes unrelated to the purposes described in this Privacy Statement without first obtaining your consent.

You may choose not to provide us with some or all of your personal information, which may impact our ability to interact with you. You may withdraw your consent at any time by notice to us in writing.

### **What personal information does MAX collect?**

MAX does not collect personal information when you visit our Site unless you choose to voluntarily provide such personal information. It is MAX's policy that personal information of the users of our site is private and confidential.

We collect information about how users interact with our site and what pages they visit. This information is used for auditing and tracking purposes and to improve the content of the Site. The data we collect is used both collectively and individually for website research to create a better experience for the users of this site.

## **How is this personal information used?**

MAX will use personal information to provide you with information and services and to help us better understand your needs. Specifically, we use your information to communicate with you, and to deliver services to you (including when you sign up to become a volunteer, sign up for our newsletter, self-refer for the mental health navigation service, for surveys from time to time, and other such or new services that we may offer from time to time). Except as provided in this Privacy Statement, MAX does not use your personal information for a purpose other than the stated purpose for which such information is collected.

## **Other Information/Logging and Cookies**

MAX may collect and/or log Internet Protocol addresses, Internet domain names, the web browser and operating system used to access the Site, the files visited, the time spent in each file, and the time and date of each visit. We retain this information, and we may retain it together with personally identifying information you may provide.

MAX also uses cookies. Cookies are identifiers that can be sent from a website via your browser to be placed on your computer's hard drive. Thereafter when you visit a website, a message is sent back to the web server by the browser accessing the website. You may elect not to accept cookies by changing the designated settings on your web browser. However, not utilizing cookies may prevent you from using certain functions and features of websites. The information collected from the use of cookies is used and analyzed to improve the functioning of the Site, and to personalize your web-browsing experience. We will link the clickstream data available to us through the use of cookies to the personal information that you may choose to provide elsewhere on the Site. We use the information we collect through the use of cookies for our business purposes, including operation of the Site.

For the purpose of enabling better Site design and a better user experience, we employ Google Analytics (a web service by Google, Inc.) to track site traffic and provide aggregate reports of how the public interacts with our Site. Session cookies are employed by Google Analytics in the form of client-side JavaScript code. In utilizing this analytics service, we maintain its existing standards in regards to the sharing and disclosure of information, security and privacy safeguards for the data, and the data retention policy, each described below. Google Analytics analyzes website usage information automatically upon visits to the our Site. Users who do not wish to have their visit information collected by Google Analytics may opt-out by downloading a browser extension or by disabling cookies in their browser settings. Opting-out of web measurements will still permit users to access the full website, with all included information and functionality.

We do not use encryption (data scrambling) on certain portions of the Site. When you are on any web site that asks you for confidential information, you should check to see if the information being transmitted is encrypted in order to increase the security of your information. Keep in mind that there is no such thing as perfect security.

## **Our Relationship to Third Parties**

We have relationships with different agents and third-party service providers, who help us provide services to you, administer our business, including designing, maintaining and improving the Site, our systems and our computer security. We also use third parties to analyze data collected on the Site. We will not disclose your personal information to anyone other than our employees, our affiliates, our agents and those third parties that require such information in order to help us provide services to our clients and administer our business, including administering and maintaining the Site. When we allow a third-party service provider to have access to your personal information, they will only be permitted to collect it or use it for purposes that are consistent with this Privacy Statement.

In order to facilitate our provision of services to you, your personal information may be used, stored and/or accessed by an affiliate or a third-party service provider outside of Canada, including in the United

States. All such information will be protected in accordance with this Privacy Statement. However, your personal information would be subject to the laws of the country to which it is transferred and stored.

If we receive personal information from a third-party, we will treat it in accordance with this Privacy Statement.

Your personal information may be de-identified and in some cases aggregated. You cannot be personally identified from the de-identified data. In this case the data is no longer personal information. MAX will never disclose personal information to third parties except as set forth herein.

### **Links to Third-Party Websites**

The Site may provide links to third-party websites for your convenience and information. If you access those links, you will leave the Site. MAX does not control those websites or their privacy practices, which may differ from MAX's Privacy Statement. Please review the privacy policies of each website that you visit.

Similarly, if you correspond with us through various chat applications, please note that your data may not be secure and will be subject to the privacy policies of these applications.

### **Our Security Measures**

We are committed to protecting the security of your personal information. We have put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use your personal information and have clearly defined internal policies and practices. We apply security safeguards appropriate to the sensitivity of the information, such as retaining information in secure facilities and making personal information accessible only to authorized employees and volunteers on a need-to-know basis.

Your personal information is stored on our database servers or hosted by third parties who have entered into agreements with us that require them to comply with privacy legislation. We have implemented technological and physical measures to prevent individuals from accessing personal information without authorization. For example, employees and volunteers have passwords for their computers.

Although we will make reasonable efforts to protect personal information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk that an unauthorized third-party could find a way to thwart our security systems. This risk is heightened if you are using unsecured/public Wi-Fi.

### **Retention**

We will retain your personal information for the period of time that is required by law. When your personal information is no longer required, it will be destroyed or depersonalized.

If you wish to review the personal information that we have about you, or would like to make changes/corrections to your personal information, please contact our Privacy Officer in writing at the address below.

### **Changes to this Privacy Statement**

In order to ensure that this Privacy Statement is kept up to date, MAX will review and update this Privacy Statement periodically. If you access or choose to continue to use the Site after the effective date of the change, you are deemed to have automatically accepted the change.

BY SUBMITTING PERSONAL INFORMATION TO MAX, YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY STATEMENT. BY USING THE SITE, YOU ALSO ACCEPT THE TERMS OF USE.

If you have any questions about the Privacy Statement or the handling of your personal information, please contact [info@maxottawa.ca](mailto:info@maxottawa.ca) MAX and ask for our Privacy Officer. You may also contact us by mail at:

**Privacy Officer**

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