

# PRIVACY POLICY

## OVERVIEW

The HUB is a not for profit, community of practice based initiative. The HUB community of practice initiative cannot succeed without contributions of utilization, implementation, satisfaction and feedback information from our partnering sites. ***Springboard respects and values your participation in the HUB community of practice.***

When you login to the Community Learning HUB website, as part of your use of the HUB Service, we collect information about the parts of the HUB website you view, the HUB content you access and run, and the web links, videos, and documents you select, view and/or download from within the HUB website.

The purpose of this document is to provide you with information you need to know about agreeing to the HUB's Privacy Policy, acquiring a HUB website account, and participating in the HUB community of practice.

## CONSENT

By using this site, you represent that you are at least the age of majority in your province of residence.

Upon clicking to "accept" Springboard's Community Learning HUB website's Privacy Policy, you are agreeing to this privacy policy and granting Springboard permission to collect, store, access, use, analyze, generate reports about, and otherwise publish information regarding your access and utilization of the HUB website, including, information concerning:

### Personal Information:

- Your account information (i.e.: your name, work email, work phone number, work address, province, region, agency, supervisor and assigned HUB team)
- The times you logged into and out of the HUB website
- The identified purposes for which you accessed HUB content (i.e.: training or delivery to clients)
- Your account information (i.e.: your name, work email, work phone number, work address, province, region, agency, supervisor and assigned HUB team)

### Non Personal Information:

- The times you logged into and out of the HUB website

- The identified purposes for which you accessed HUB content (i.e.: training or delivery to clients)
- The HUB content you accessed
- The length of time you viewed HUB content

Anonymous information: pertaining to the clients you provide HUB services to, such as their age, gender, ethno-racial affiliation, referral path, the HUB content delivered, date and time of HUB delivery, duration of HUB delivery, and identified outcome of each client's overall HUB experience. This data is used to report to government funders, private foundations and corporate sponsors who grant funds to Springboard's Community Learning HUB. A full list of our funders and supporters is available at [www.communitylearninghub.ca](http://www.communitylearninghub.ca). Additionally, the data is used within Springboard to track HUB utilization for Springboard's Board of Directors, Annual Reports, communication products and to review and improve HUB's user experience.

## USE OF INFORMATION BY SPRINGBOARD

Springboard's use of information pertaining to you and your use of the HUB website would always and only be, in the sole discretion of Springboard, for the purposes of:

- Understanding and demonstrating (to stakeholders and potential stakeholders) the parameters of HUB website utilization and implementation,
- Identifying and demonstrating (to stakeholders and potential stakeholders) evidence-informed opportunities for the improvement of the HUB website, its content, facilitator training and program implementation.

We take reasonable precautions and follow industry best practices to protect your information and make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. We will not sell your information.

## RIGHT TO ACCESS AND RECTIFY YOUR DATA

You may access and verify your personal information. Upon receipt of a written request, you will be informed, within a reasonable time following such request, of the existence, use and disclosure of your personal information. In order to safeguard personal information, we may need specific identification from you in order to verify your identity before we can provide you with the personal information we hold. There may be instances when we will not be able to provide you with the personal information that you request, for instance, if your personal information:

- contains references to other persons,

- has already been destroyed due to legal requirements or because we no longer needed it for our purposes,
- contains references to other persons,
- is subject to legal privilege,
- contains confidential proprietary information, or
- cannot be disclosed for other legal reasons.

## HUB ACTIVITY REPORTS PREPARED BY SPRINGBOARD

Springboard has access to all information pertaining to HUB utilization and implementation uploaded by facilitators from across the entire HUB Community of Practice; this includes information pertaining to the utilization and implementation of the HUB website at your organization and the details of all the HUB website activities you have directly participated in.

- The HUB website allows facilitators to view an individualized HUB activity report of all the HUB training events and HUB delivery events that they themselves have directly participated in. Only the person who is the actual subject of the individual facilitator training/delivery report will have access to it.
- Your organization's leadership can request from Springboard an annual report of their organization's record of HUB activity for the preceding fiscal year. Any such reports prepared by Springboard and shared with your organization's leadership, would only feature anonymous facilitator and client information.
- Springboard reserves the right, in its sole discretion, to prepare, share with stakeholders and publish reports of any organization's record of HUB activity over any period of time.
- By signing the HUB Privacy Policy, you agree to hold Springboard harmless should there be, in thought or in fact, any negative impacts to yourself, directly or indirectly as a result of Springboard's decision to share and/or publish such reports.

## OPT-OUT

You may opt-out of the HUB community of practice and deactivate your HUB website account at anytime by sending us an email requesting deactivation of your account, to: [hubinfo@springboardservices.ca](mailto:hubinfo@springboardservices.ca).

You may also mail us a deactivation request at: Operation Springboard 2 Carlton Street, Suite 800, Toronto, ON, M5B-1J3.

Upon receipt of such a request, Springboard will de-activate your account as soon as possible and your access to the HUB website will thereafter cease and the HUB website will no longer collect any further information related to you. We will then depersonalize any business contact information we had already collected in relation to your account, *but will NOT remove any depersonalized information pertaining to your record of HUB activity* (as to do so would distort the true record of your organization's utilization of the HUB).

## **EMAIL MARKETING**

By accepting this privacy policy, you further grant us permission to send you messages about our Community Learning HUB service, the HUB community of practice, new HUB programs and other updates, to the email address you used to create your HUB website account.

## **OTHER DISCLOSURE**

We may disclose your personal information if we are required by law to do so or if you violate our Terms of Service.

## **THIRD-PARTY SERVICES**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us. In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us.

Once you leave our website or are redirected to a third-party website (eg.YouTube.com) or application, you are no longer governed by this Privacy Policy or our website's Terms of Service. When you click on links on our website, they may direct you away from our site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

## **SECURITY**

We have security measures in place to protect the loss, misuse and alteration of the information under our control. We have adopted appropriate safeguards to ensure that personal information is secure against disclosure, loss or theft or unauthorized access, copying, use or modification.

## DATA RETENTION

We retain your personal data for so long as it is required to fulfil the activities set out in this privacy policy for as long as otherwise communicated to you or for so long as is permitted by applicable law.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

You may review the latest version of the HUB Privacy Policy at:

<http://www.communitylearninghub.ca/#/privacy>

## QUESTIONS AND CONTACT INFORMATION

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information, email us at: [HUBinfo@springboardservices.ca](mailto:HUBinfo@springboardservices.ca), or call us at the Springboard head office: (416) 977-0089, located at 2 Carlton Street, Suite 800, Toronto, ON, M5B-1J3, Canada