



PRIVACY IMPACT ASSESSMENT

I BASIC INFORMATION - New or Existing Program, System or Legislation

1. Public Body and Program Area.

Public Body	Vancouver Community College
Program	
School/Depart.	International Education
Initiative Title	Canoo

2. Contact Position and/or Name, Telephone Number and E-Mail Address.

(This should be the name of the individual most qualified to respond to questions regarding the PIA).

Name, Title	Jennifer Gossen
School/Depart.	International Education
Phone Number	604-809-8029
E-Mail	jgossen@vcc.ca

3. Description of the Program/System/Legislation (Initiative) being assessed.

(Please note here if the initiative does **not** collect, use or disclose personal information). If this is a change to an existing legislation, system or program, describe the current system or program and the proposed changes.

Canoo is a mobile application (an app) operated by the Institute for Canadian Citizenship ("ICC") dedicated to bringing Canadian newcomers exclusive offers to events, venues, and experiences to encourage them to celebrate, enjoy, and explore their new home. VCC will provide only the number of international students to Canoo; Canoo will not receive any personal information from VCC. Once the MOU is in place, Canoo will share the number of access codes as requested by VCC. Our international student office will then distribute these codes to all international students by using the email the students provided to VCC upon registration and that VCC uses for regular communication. With the access code, the student will be able to sign up to Canoo as individuals, and not as a VCC initiative, and by consenting to Canoo's Terms and Conditions/Privacy Policy. Canoo only collects Personal Information that users choose to disclose while they interact with or use the Services, including when they take advantage of Canoo offers through their partners. They do not collect information about users that they have disclosed to third-party apps or websites, other than in relation to their redeeming Canoo offers. Any information provided by students to the Canoo app or collected by the Canoo app will be administered according to their privacy policy.

		*Yes	No
(a)	Does this PIA involve a common or integrated program/activity (as defined in the FOIPP Act)?	<input type="radio"/>	<input checked="" type="radio"/>
	and		
	Is the common or integrated program/activity confirmed by the written requirements set out in the regulation?	<input type="radio"/>	<input checked="" type="radio"/>
(b)	Does this PIA involve a data-linking initiative (as defined in the FOIPP Act)?	<input type="radio"/>	<input checked="" type="radio"/>

If yes, please ensure you have notified the Office of the Information and Privacy Commissioner at an early stage of development of the initiative pursuant to section 69 (5.5) of the FOIPP Act.

4. Purpose/Objectives of the initiative (if statutory, provide citation).

To provide access codes to VCC international students to access Canoo, a pilot project launching on the West Coast of Canada. VCC will commit to giving international students a unique code. With the access code, the student will be able to sign up to Canoo. Our international student office will handle the student verification process and provide unique codes to international students. Only students verified by our office will have access to Canoo.



5. What are the potential impacts of this proposal? (Include privacy impacts in this description).

Minimal; VCC is using personal information previously collected for uses consistent with their original collection (study permit to establish international student status; contact information for regular contact from College). There is a minimal risk that if a student ignored advice and used their VCC email address to register for the app that this information could be accessed incorrectly in the event that the Canoo app is breached, but this does not create any serious issues for students and students have to consent to Canoo's terms and conditions upon registration. Canoo is not acting as a vendor or service provider for VCC.

6. Provide details of any previous PIA or other form of personal information assessment done on this initiative (in whole or in part).

none

IF THERE IS NO PERSONAL INFORMATION INVOLVED, GO TO [X. SIGNATURES](#).

****IMPORTANT NOTE:** The FOIPP Act defines personal information as "recorded information about an identifiable individual other than contact information." Contact information includes the name, title, telephone or facsimile number, email address etc., which enables an individual at a place of business to be contacted.

II DESCRIPTIVE INFORMATION

1. Describe the elements of personal information that will be collected, used and/or disclosed and the nature and sensitivity of the personal information. [See note above about the definition of personal information.]

For example: Name, home address, gender, age/birthdate, SIN, Employee#, race/national, ethnic origin.

We will use study permit status to verify students' international student status and their email for sending the access code. We will use this information to determine the number of access codes to request from Canoo. The only information that VCC is disclosing to Canoo is the number of international students at VCC so that they can provide the equivalent number of access codes. VCC is not providing Canoo with any personal information.

2. Provide a description (either a narrative or flow chart) of the linkages and flows of personal information collected, used and/or disclosed.

We will use limited information obtained for registration purposes (study permit status and email address) to send an email to eligible international students with an access code from Canoo to use their app. Students will be encouraged to use their personal email address to access the Canoo app and will agree to Canoo's terms and conditions. Students will be reminded that this is not a VCC initiative, but is a third party app that they can decide whether or not to access. A copy of the MOU and Canoo's Privacy Policy are attached to this PIA.

III PERSONAL INFORMATION COLLECTION

(Section 26 and section 27 of the *Freedom of Information and Protection of Privacy Act* "FOIPP Act")

****IMPORTANT NOTE:** Recent amendments to the FOIPP Act have clarified when personal information has *not* been collected by a public body. See section 27.1 or contact VCC's Privacy Officer for further details.

	Yes	No	n/a
Is personal information being collected?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING COLLECTED, GO TO [IV. USE OF PERSONAL INFORMATION](#)

1) Authorization for Collection:

A public body may collect personal information as authorized by one of the following provisions:

s. 26		Yes	No	n/a
(a)	Is the collection of personal information specifically authorized by, or under, an Act, other than the FOIPP Act?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	If yes, please specify the name of the Act and relevant section			
(b)	Is the personal information being collected for law enforcement purposes?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)	Is the personal information directly related to, and necessary for, a program or activity of the public body?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d)	Is the personal information being collected for a prescribed purpose (where there is a regulation defining that purpose)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	If yes, please specify the prescribed purpose.			
	(i) Has the individual whose personal information is being collected consented, in the prescribed manner, to that collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	and			
	(ii) Would a reasonable person consider that collection appropriate in the circumstances?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(e)	Is the collection of personal information necessary for the purposes of planning or evaluating a program or activity of a public body?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(f)	Is the collection of personal information necessary for the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(g)	Is the personal information being collected by observation at a presentation, ceremony, performance, sports meet, or similar event where the individual voluntarily appears and that is open to the public?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Please identify event:			

s. 26		Yes	No	n/a
(h)	Is personal identity information being collected by:			
	A designated provincial identity information services provider and the collection of the information is necessary to enable it to provide services under section 69.2, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	A public body from a designated provincial identity information services provider and the collection of the information is necessary to enable the public body to identify an individual for the purposes of providing a service to the individual or the provincial identity information services provider to provide services under section 69.2.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If none of the above questions has been answered "yes", your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact VCC's Privacy Officer.

2) How will the personal information be collected?

A public body must collect personal information directly from the individual the information is about, with certain specific exceptions.

	Yes	No	n/a
Will the personal information be collected <u>directly</u> from the individual that the information is about?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

IF YOU ARE ONLY COLLECTING PERSONAL INFORMATION DIRECTLY AS NOTED ABOVE, YOU WILL NOT NEED TO COMPLETE THE NEXT SECTION ON INDIRECT COLLECTION. GO TO 3. [NOTIFICATION TO COLLECT INFORMATION.](#)

If the personal information has **not been collected directly** from the individual it is about, check which of the following authorizes the indirect collection:

s. 27(1)		Yes	No	n/a
(a)(i)	Did the individual the information is about authorize another method of collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a)(ii)	Has indirect collection been authorized by the Information and Privacy Commissioner?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a)(iii)	Has indirect collection been authorized by another enactment?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
If yes, please specify the name of the Act and relevant section(s)				
(a.1)(i)	Is the personal information necessary for the medical treatment of an individual and it is not possible to collect the information directly from that individual?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(a.1)(ii)	Is the personal information necessary for the medical treatment of an individual and it is not possible to obtain authority under (iv) for another method of collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

s. 27(1)		Yes	No	n/a
(b)	Is the public body collecting personal information disclosed to it by another public body under an authority within sections 33 to 36 of the FOIPP Act?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Specify relevant section(s) or subsections that apply.				
(c)(i)	Is the personal information being collected for the purpose of determining suitability for an honour or award including an honorary degree, scholarship, prize or bursary?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(ii)	Is the personal information being collected for the purpose of a proceeding before a court or a judicial or quasi-judicial tribunal?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(iii)	Is the personal information being collected for the purpose of collecting a debt or fine or making a payment?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(iv)	Is the personal information being collected for the purpose of law enforcement?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)(v)	Is the personal information being collected to reduce the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d)	Is the personal information being transferred to the public body from another public body in accordance with section 27.1?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(e)	Is the personal information being collected necessary for delivering a common or integrated program or activity?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(f)	Is the personal information about an employee, other than a service provider, and the collection of the information is necessary for the purposes of managing or terminating an employment relationship between a public body and the employee?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(g)	Is the information personal identity information that is collected by the designated provincial identity information service that is necessary to provide services under section 69.2?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required (e.g., explanation of method of collection)				

If none of the above authorities have been checked, your office does not have the authority under the FOIPP Act to collect the personal information in question. If you have any questions or require clarification please contact VCC's Privacy Officer.

3) Notification to collect information

A public body must ensure that an individual from whom it collects personal information is notified of the collection as outlined below.

27(2)	Yes	No	n/a
Has the individual from whom personal information is being collected, been informed of:			
(a) the purpose for collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) the legal authority for collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c) the contact information of the person who can answer questions regarding the collection?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required (e.g., method of notification)			

Notification is not required if the answer is “yes” to any of the following:

27(3)	Yes	No	n/a
(a) Is the personal information about law enforcement or anything referred to in section 15(1) or section 15(2) of the FOIPP Act?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) Has the Minister responsible for the FOIPP Act excused your public body from complying because it would			
(a) result in the collection of inaccurate information?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
or			
(b) defeat the purpose or prejudice the use for which the personal information is collected?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c) The information			
(a) is not required, under subsection 27(1), to be collected directly from the individual the information is about, and	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) is not collected directly from the individual the information is about			
(d) Is the information collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appears and that is open to the public.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Please identify event:			
27 (4) Is it reasonable to expect that notifying an employee of collection under subsection 27 (1) (f) would compromise			
(a) the availability or accuracy of the information, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) an investigation or a proceeding related to the employment of the employee?			
Additional details as required			

If you have not provided the required notification as outlined above, please contact Knowledge and Information Services.

IV USE OF PERSONAL INFORMATION - (Section 32 of the FOIPP Act)

	Yes	No	n/a
Is personal information being used?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING USED, GO TO [V. DISCLOSURE OF PERSONAL INFORMATION](#)

Under the FOIPP Act, a public body may use personal information in its custody or under its control only for certain specified purposes as outlined below.

The public body **must** check one or more of the authorities listed below:

s.32	Yes	No	n/a
(a) Has the individual the personal information is about consented to the use? (Note: Supporting documentation must be on file.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(b) Will the information be used only for the purpose for which it was obtained or compiled or for a use consistent with the original purposes?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use. Study permit status collected upon admission/registration. Email address pro			
(c) If the personal information was disclosed to the public body by another public body under an authority within sections 33 to 36, is the information being used for that same purpose?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specify subsection(s) being applied			

If you have not checked one of the above, you do not have the authority to use the information. If you have any questions or require clarification please contact VCC's Privacy Officer.

V DISCLOSURE OF PERSONAL INFORMATION

(Section 33, section 33.1, section 33.2, section 33.3, section 34, section 35 and section 36 of the FOIPP Act)

	Yes	No	n/a
Is personal information being disclosed?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

IF THERE IS NO PERSONAL INFORMATION BEING DISCLOSED, GO TO [VI. ACCURACY AND CORRECTION OF PERSONAL INFORMATION](#).

A public body may disclose personal information in its custody or under its control only as permitted under sections 33.1, 33.2, or 33.3 of the FOIPP Act.



1) Disclosure of Personal Information

Sections 33, 33.1, 33.2 and 33.3 of the FOIPP Act provide the legislative authority to disclose personal information. Section 33 provides that personal information **cannot** be disclosed unless it is authorized under section 33.1 or 33.2.

Please choose the main authorization(s) for disclosure below. All authorities that may apply do not need to be checked, only the main authorizations for the initiative.

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(a)	In accordance with Part 2 (pursuant to an FOI request)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(a.1)	If the information or disclosure is of a type described in section 22(4) (e), (f), (h), (i) or (j):			
	22(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if			
	(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a public body or as a member of a minister's staff,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(f) the disclosure reveals financial and other details of a contract to supply goods or services to a public body,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(h) the information is about expenses incurred by the third party while travelling at the expense of a public body,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a public body, not including personal information supplied in support of the application for the benefit, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a public body, not including personal information that is supplied in support of the application for the benefit or is referred to in subsection 22(3)(c).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(b)	If the individual the information is about has identified the information and consented, in the prescribed manner, to its disclosure inside or outside Canada, as applicable (Note: Supporting documentation must be on file)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(c)	In accordance with an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada that authorizes or requires its disclosure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Specify name of enactment and relevant section(s)			
(1)(c.1)	If the personal information is made available to the public in British Columbia under an enactment, (other than the <i>Freedom of Information and Protection of Privacy Act</i>) that authorizes or requires the information to be made public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Specify name of enactment and relevant section(s)			

s. 33.1	Disclosure inside OR outside Canada	Yes	No	n/a
(1)(d)	In accordance with a provision of a treaty, arrangement or written agreement that (i) authorizes or requires its disclosure, and (ii) is made under an enactment of British Columbia (other than the <i>Freedom of Information and Protection of Privacy Act</i>) or Canada	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Specify name of enactment and relevant section(s)				
(1)(e)	To an individual who is a minister, an officer of the public body or an employee of the public body other than a service provider, if (i) the information is necessary for the performance of the duties of the minister, officer or employee,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
and				
(ii) in relation to disclosure outside Canada, the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
If paragraph (1)(e)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(1)(e.1)	To an individual who is a service provider of the public body, or an employee or associate of such a service provider, if (i) the information is necessary for the performance of the duties of the individual in relation to the public body,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
and				
(ii) in relation to disclosure outside Canada, (A) the individual normally receives such disclosure only inside Canada for the purpose of performing those duties, and (B) the outside disclosure is necessary because the individual is temporarily travelling outside Canada				
If paragraph (1)(e.1)(ii) applies, please explain how the travel is temporary and why disclosure outside Canada is necessary				
(1)(f)	To an officer or employee of the public body or to a minister, if the information is immediately necessary for the protection of the health or safety of the officer, employee, or minister	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(g)	To the Attorney General or legal counsel for the public body, for the purpose of preparing or obtaining legal advice for the government or public body or for use in civil proceedings involving the government or public body	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(h)	To the minister responsible for the <i>Coroner's Act</i> or a person referred to in section 36 of that Act, for the purposes of that Act	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(i)	If			
(i) the disclosure is for the purposes of collecting amounts owing to the government of British Columbia or a public body by				

	a. an individual, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	b. corporation of which the individual the information is about is or was a director or officer,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	and			
	(ii) in relation to disclosure outside Canada, there are reasonable grounds for believing that	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	a. the individual the information is about is in, resides in or has assets in the other jurisdiction, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	b. if applicable, the corporation was incorporated in, is doing business in or has assets in the other jurisdiction	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
1(i.1)	For the purposes of			
	(i) a payment to be made to or by the government of British Columbia or a public body,	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(ii) authorizing, administering, processing, verifying or cancelling such a payment, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(iii) resolving an issue regarding such a payment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(j)	(i) Repealed.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(k)	For the purposes of			
	(i) licensing or registration of motor vehicles or drivers, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(ii) verification of motor vehicle insurance, motor vehicle registration or drivers licences	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(l)	For the purposes of licensing, registration, insurance, investigation or discipline of persons regulated inside or outside Canada by governing bodies of professions and occupations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(m)	If			
	(i) the head of the public body determines that compelling circumstances exist that affect anyone's health or safety, and	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(ii) notice of disclosure is mailed to the last known address of the individual the information is about, unless the head of the public body considers that giving this notice could harm someone's health or safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1) (m.1)	For the purpose of reducing the risk that an individual will be a victim of domestic violence, if domestic violence is reasonably likely to occur	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(n)	So that the next of kin or a friend of an injured, ill or deceased individual may be contacted	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(o)	In accordance with section 36 (disclosure for archival or historical purposes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(p)	The disclosure			
	(i) is necessary for			

	(A) installing, implementing, maintaining, repairing, trouble shooting or upgrading an electronic system or equipment that includes an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(B) data recovery that is being undertaken following failure of an electronic system that is used in Canada by the public body or by a service provider for the purposes of providing services to a public body	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	and (ii) in the case of disclosure outside Canada (A) is limited to temporary access and storage for the minimum time necessary for that purpose, and (B) in relation to data recovery under subparagraph (i)(B), is limited to access and storage only after the system failure has occurred	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	If paragraph (1)(p)(ii) applies, please explain how the temporary access and storage is for the <i>minimum time necessary</i>			
(1)(q)	If the information was collected by observation at a presentation, ceremony, performance, sports meet or similar event at which the individual voluntarily appeared and that was open to the public. Please identify event:	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(r)	If the information Was disclosed on a social media site by the individual the information is about, Was obtained or compiled by the public body for the purpose of enabling the public body to engage individuals in public discussion or promotion respecting proposed or existing initiatives, policies, proposals, programs or activities of the public body or respecting legislation relating to the public body, and Is disclosed for a use that is consistent with the purpose described in subparagraph (ii).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Additional details as required			
(1)(s)	<u>In accordance with section 35 (disclosure for research or statistical purposes).</u>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(1)(t)	<u>To comply with a subpoena, a warrant or an order issued or made by a court, person or body in Canada with jurisdiction to compel the production of information</u>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(2)	In addition to the authority under any other provision of this section or section 33.2, a public body that is a law enforcement agency may disclose personal information referred to in section 33			

(2)(a)	To another law enforcement agency in Canada	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(2)(b)	To a law enforcement agency in a foreign country under an arrangement, a written agreement, a treaty or provincial or Canadian legislative authority.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(3)	The minister responsible for this Act may, by order, allow disclosure outside Canada under a provision of section 33.2 in specific cases or specified circumstances, subject to any restrictions or conditions that the minister considers advisable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(4)	In addition to the authority under any other provision of this section or section 33.2, the Insurance Corporation of British Columbia may disclose personal information if, (a) the information was obtained or compiled by that public body for the purposes of insurance provided by the public body, and (b) disclosure of the information is necessary to investigate, manage or settle a specific insurance claim.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(5) and (6)	For the purposes of operating the designated provincial identity information services as permitted under section 33.1 (5) and (6)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(7)	To respond to citizens' enquiries as permitted under section 33.1(7)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Additional details as required			

s. 33.2	Disclosure inside Canada only	Yes	No	n/a
(a)	For the purpose for which it was obtained or compiled or for a use consistent with that purpose (see section 34)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Please provide details of the original purpose for which the personal information was obtained or compiled. Include, if applicable, details of the consistent/secondary use.			
(b)	Repealed.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c)	To an officer or employee of the public body or to a minister, if the information is necessary for the performance of the duties of the officer, employee or minister	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d)	To an officer or employee of (i) a public body, or (ii) an agency or to a minister, if the information is necessary for the delivery of a common or integrated program or activity and for the performance of the duties, respecting the common or integrated program or activity, of the officer, employee or minister to whom the information is disclosed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(e)	To an officer or employee of a public body or to a minister, if the information is necessary for the protection of the health or safety of the officer, employee or minister	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

s. 33.2 Disclosure inside Canada only		Yes	No	n/a
(f)	To the auditor general or any other prescribed person or body for audit purposes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(g)	To a member of the Legislative Assembly who has been requested by the individual the information is about to assist in resolving a problem	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(h)	To a representative of the bargaining agent, who has been authorized in writing by the employee whom the information is about, to make an inquiry	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(i)	To a public body or a law enforcement agency in Canada to assist in a specific investigation			
	(i) undertaken with a view to a law enforcement proceeding, or	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	(ii) from which a law enforcement proceeding is likely to result	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(j)	To the archives of the government of British Columbia or the archives of a public body, for archival purposes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(k)	Repealed.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(l)	To an officer or employee of a public body or to a minister, if the information is necessary for the purposes of planning or evaluating a program or activity of a public body	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required				

s. 33.3 Disclosure to Public Without Request		Yes	No	n/a
(1)	Do the records fall within a category established under section 71 (1)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required				
(2)	Do the records fall within a category established under section 71.1 (1)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additional details as required				

2) Systematic or Repetitious Disclosure/Exchanges?

		Yes	No	n/a
i.	Do the disclosures of personal information under section 33.2 occur on a regular basis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
ii.	Has an Information Sharing Agreement been completed for these disclosures/exchanges?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
iii.	Has information related to the Information Sharing Agreement(s) been entered into the Personal Information Directory ?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Personal information exchanges within a public body do not normally require an Information Sharing Agreement (ISA) if they are for a consistent purpose as defined under



section 33.2(a) of the Act or are necessary for the performance of an employee of the public body under section 33.2(c). However, depending on the nature and sensitivity of the personal information exchanged, the public body might choose to prepare an ISA or similar written statement of understanding.

3) Research or Statistical Purposes (Section 35)

	Yes	No	n/a
Has a researcher requested access to personal information in an identifiable form for research purposes?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If “yes”, a research agreement that conforms to the criteria established in section 35(d) must be in place. Contact VCC Privacy Officer for assistance.

Please note: Research using personal information may only be conducted if it meets all of the terms of section 35.

4) Archival or Historical Purposes (Section 36)

The archives of the government of British Columbia, the archives of a public body, or a board or a francophone education authority (as defined in the [School Act](#)) may disclose personal information in its custody or under its control to be disclosed for archival or historical purposes as authorized by section 36.

Please check the authorization(s) for disclosure listed below.

	Yes	No	n/a
(a) The disclosure would not be an unreasonable invasion of personal privacy under section 22	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(b) The disclosure is for historical research and is in accordance with section 35 (research agreements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(c) The information is about someone who has been dead for 20 or more years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(d) The information is in a record that has been in existence for 100 or more years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If you have not answered “yes” to any of the above authorizations for disclosure you do not have the authority to disclose personal information. If you have any questions or require clarification, please contact VCC Privacy Officer.

VI ACCURACY AND CORRECTION OF PERSONAL INFORMATION
(Section 28 and section 29 of the FOIPP Act)

If an individual’s personal information will be used by a public body to make a decision that directly affects the individual, the public body must make every reasonable effort to ensure that the information is accurate and complete. An individual must also have the ability to access, or have corrected or annotated, their personal information for a period of one year after a decision has been made based upon the personal information.

		Yes	No	n/a
1.	Are there procedures in place to enable an individual to request/review a copy of their own personal information?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
2.	Are there procedures in place to correct or annotate an individual's personal information if requested, including what source was used to update the file?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
3.	If personal information is corrected, are there procedures in place to notify other holders of this information?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:			
	Contact person:			
	Phone number:			
Additional details as required				

If any of the questions above have been answered "no", please contact VCC Privacy Officer for further clarification.

VII SECURITY AND STORAGE FOR THE PROTECTION OF PERSONAL INFORMATION (Sections 30 and 30.1 of the FOIPP Act)

Note: For PIAs related to new or existing systems, this section should be completed by the Branch of the ministry responsible for systems maintenance and security, and signed off by this branch, in the [Signatures](#) section.

For PIAs that do not involve systems initiatives, this section should be completed by the program area completing the PIA. In this case, the signature of the systems representative is not required.

Section 30 of the Act requires a public body to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

		Yes	No	n/a
1.	Is there reasonable technical security in place to protect against unauthorized access or disclosure?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
2.	Is there reasonable physical security in place to protect against unauthorized access or disclosure?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
3.	Are there branch policies and procedures in place for the security of personal information during routine collection, use and disclosure of the information?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
If yes, please provide the name of the policy and/or procedures, a contact person and phone number.				
	Policy/procedure:			

	Contact person:			
	Phone number:			
	Additional details as required			
4.	Have user access profiles been assigned on a need-to-know basis?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
5.	Do controls and procedures exist for the authority to add, change or delete personal information?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
6.	Does your system security include an ongoing audit process that can track use of the system (e.g., when and who accessed and updated the system)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Please explain the audit process and indicate how frequently audits are undertaken and under what circumstances			
7.	Does the audit identify inappropriate accesses to the system?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
	Additional details			

If any of the questions above have been answered "no", please contact your Ministry's Security Officer. If you have any questions or require clarification please contact VCC Privacy Officer.

VII SECURITY ARRANGEMENTS FOR THE PROTECTION OF PERSONAL INFORMATION
cont'd

Section 30.1 requires a public body to ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada unless the individual the information is about has consented or the disclosure is otherwise allowable under the Act.

	Yes	No	n/a
Will the information be stored or accessed only in Canada?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Personal information in a public body's custody or under its control must be stored and accessed only in Canada, unless one of the following applies:

	Yes	No	n/a
(a) Has the individual the personal information is about identified it and consented, in the prescribed manner, to it being stored in or accessed from another jurisdiction?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Please explain			

(b)	Will the personal information be stored in or accessed from another jurisdiction for the purpose of a disclosure that is authorized under the <i>Freedom of Information and Protection of Privacy Act</i> ?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Please explain				
(c)	Will the personal information be disclosed under section 33.1(1)(i.1)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Please explain				

If you have not answered “yes” to any of the above authorizations for storage or access of personal information outside Canada or if you require clarification, please contact Knowledge and Information Services.

VIII RETENTION OF PERSONAL INFORMATION - (Section 31 of the FOIPP Act)

If a public body uses an individual’s personal information to make a decision that directly affects the individual, the public body must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.

		Yes	No	n/a
1.	Do you have an approved records retention and disposition schedule?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Is there a records retention schedule to ensure information used to make a decision that directly affects an individual is retained for at least one year after use?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered “no” to the above questions, your procedures may need to be revised. Please contact your Records Officer.

Note: Records of provincial public bodies and designated organizations/public bodies cannot be destroyed unless approval is granted under the authority of the *Document Disposal Act*. Please consult with your Records Officer to initiate the records scheduling process.



Comments:

X SIGNATURES

PUBLIC BODY APPROVAL:

Jennifer Gossen

Program Manager

Jennifer Gossen Digitally signed by Jennifer Gossen
Date: 2024.02.08 08:05:29 -08'00'

Signature

February 8, 2024

Date

Norman Chang

Institutional Contact Responsible for
Systems Maintenance and Security

Norman Chang Digitally signed by Norman Chang
Date: 2024.03.01 10:03:19 -08'00'

Signature

March 1, 2024

Date

VCC Privacy Officer

Signature

Date

GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA)

X SIGNATURES

PUBLIC BODY APPROVAL:

Jennifer Gossen

Program Manager

Jennifer Gossen

Digitally signed by Jennifer Gossen
Date: 2024.02.08 08:05:29 -08'00'

Signature

February 8, 2024

Date

Institutional Contact Responsible for
Systems Maintenance and Security

Signature

Date

Surinder Aulakh

VCC Privacy Officer

Signature



Feb. 22, 2024

Date

GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA)



MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (the "MoU") is entered into between **Institute for Canadian Citizenship**, hereafter referred to as "the ICC," with their primary address being 325 Front Street W, 4th Floor, Toronto, ON, M5V 2Y1 and **Vancouver Community College**, hereafter referred to as "the Institution," with its primary address being 250 W Pender Street, Vancouver, British Columbia, V6B 1S9, Canada collectively referred to as the "Parties," on this 23 day of November **2023**.

1. Purpose

The purpose of this MoU is to establish a collaboration between the ICC and the Institution to provide services and support to international students via the ICC's Canoo Access Pass, as well as other applicable programs as and when they are implemented. The Parties recognize the value of joint efforts to enhance the educational experience and general welfare of international students as they adjust to life in Canada.

2. Objectives

The Parties agree to collaborate on the following objectives:

- a) Provide International Students of the Institution access to a version of the Canoo App made for them.
- b) Provide International Students of the Institution first access to any other products that the ICC may create for international students.

3. Roles and Responsibilities

3.1 The ICC's Responsibilities:

- a) Provide a specific number of unique access codes to the Institution to deliver to its international students to access the Canoo app
- b) Continue to add benefits for international students under Canoo and under its other programs.
- c) Maintain regular communication with the Institution regarding program updates, progress, and evaluation.
- d) Collaborate with the Institution to develop joint initiatives, events, and activities for students, when applicable.
- e) Appoint a representative as a point of contact for coordination and communication with the Institution.

3.2 Institution's Responsibilities:

- a) Validate and distribute the ICC's unique access codes to its international students
- b) Collaborate with the ICC to develop joint initiatives, events, and activities for students, when applicable.
- c) Support the ICC in promoting the services to students through university channels.
- d) Appoint a representative as a point of contact for coordination and communication with the ICC.



4. Marketing

Subject to prior approval, each party may use the other party's logo, marketing assets and/or other requested copyrighted content to promote the services covered under this agreement, provided that the following guidelines are adhered to:

4.1 ICC's Marketing Guidelines

- a) Each use of the ICC's logo, marketing assets and/or other copyrighted content must be submitted to media@inclusion.ca and approved by the ICC before being published and/or distributed.
- b) Any mention of the ICC on the Institution's website must be submitted to media@inclusion.ca and approved by the ICC before being published and/or distributed.
- c) Each material submitted to the ICC for approval must be in its final form and may not be altered after approval is granted. Any alterations to approved material will need to be resubmitted for consideration.

4.2 Institution's Marketing Guidelines

- d) Each use of the Institution's logo, marketing assets and/or other copyrighted content must be submitted to *BLANK* and approved by the Institution before being published and/or distributed.
- e) Any mention of the Institution on the ICC website must be submitted to *BLANK* and approved by the Institution before being published and/or distributed.
- f) Each material submitted to the Institution for approval must be in its final form and may not be altered after approval is granted. Any alterations to approved material will need to be resubmitted for consideration.
- g) ICC may refer to the *BLANK* for information regarding Marketing and Communication materials.

5. Duration and Termination

This MoU shall commence on the date first written above and shall remain in effect for a period of 12 months. Either party may terminate this MoU by providing written notice to the other party at least 90 days prior to the intended termination date.

6. Financial Arrangements

Each Party shall be responsible for its own costs and expenses incurred in fulfilling its obligations under this MoU, unless otherwise agreed in writing.

7. Intellectual Property

Any intellectual property developed jointly or separately as a result of this partnership shall be governed by a separate agreement or arrangement to be negotiated and executed by the Parties.

8. Confidentiality

The Parties agree to treat all information shared during the course of this partnership as confidential and to use it solely for the purposes outlined in this MoU.



9. Governing Law and Dispute Resolution

This MoU shall be governed by and construed in accordance with the laws of Canada. Any disputes arising from or in connection with this MoU shall be resolved amicably through negotiations between the Parties.

10. Entire Agreement

This MoU constitutes the entire agreement between the ICC and the Institution and supersedes any prior understanding or agreement, whether written or oral, relating to the subject matter herein.

11. Non-Binding Agreement

The Parties acknowledge this MOU is non-binding and neither party is authorized to represent or bind the other party in any manner.

X

Tarun Tripathi

Senior Director, Growth and Innovation

Institute for Canadian Citizenship

Canoo Privacy Policy

Last Updated March 31, 2022

Introduction

Welcome to Canoo!

Canoo is a mobile application (an app) operated by the Institute for Canadian Citizenship ("**ICC**") dedicated to bringing Canadian newcomers exclusive offers to events, venues, and experiences to encourage you to celebrate, enjoy, and explore your new home. We have partnered with a wide range of organizations to bring you offers for events, attractions, travel, shopping, and volunteer opportunities to bring you some of the best that Canada has to offer.

Canoo's services, programs, activities, and offerings are available through the Canoo app, which was formerly known as the Cultural Access Pass. By downloading, installing, accessing, or otherwise using the Canoo app or participating in the Canoo program you agree to be bound to our Privacy Policy ("**Policy**").

Please take the time to familiarize yourself with this Policy, as it outlines how Canoo ("**us**," "**our**," and "**we**"), collects, uses, stores, and shares information when our users ("**you**" and "**your**") interact with us. It also describes your privacy choices and how you can contact us if you have questions or would like to exercise your rights under applicable privacy laws. This Policy applies to all users of the Canoo app, including iOS and Android versions of the app, and any other services that are branded "Canoo" and link or reference this Policy (collectively, the "**Services**").

We recommend that you periodically review this Policy as it may be updated or revised from time to time. If you do not agree to our practices, please do not register, subscribe, create an account, or otherwise interact with the Services. By signing up for, using, or continuing to use the Services, you consent to the privacy practices described in this policy.

This Policy is incorporated into and is subject to the Canoo Terms of Use.

Our Privacy Policy is organized as follows:

1. Types of Information We Collect
2. How We Use Information
3. When and Why We Share and Disclose Information
4. Data Safeguards and Security
5. Your Consent
6. Accessing and Correcting Your Personal Information
7. Data Retention
8. Third-Party Sites
9. Children's Privacy

10. Changes and Updates to this Privacy Policy

11. Our Contact Information

1. Types of Information We Collect

Canoo only collects Personal Information you choose to disclose while you interact with or use the Services, including when you take advantage of Canoo offers through our partners. We do not collect information about you that you have disclosed to third-party apps or websites, other than in relation to you redeeming Canoo offers.

We may ask you to provide information when you register, subscribe, or create an account for our Services, contact Canoo for customer service purposes, or otherwise interact with or use the Services. We may collect certain types of information, including information that can be used to reasonably identify you, such as your name, email address, mailing address, phone number, date of birth, geographic location, and mobile device data (as described below) ("**Personal Information**"), and information that does not identify you personally. We may collect the following types of information, including Personal Information:

- **Registration and Contact Information** that allows you to register for the Services and allows us to communicate with you, such as your full name, email address, password, telephone number, or other address at which you receive communications from or on behalf of Canoo. All personal information is anonymized in accordance with our retention policy once entered on the Canoo app and we do not retain a copy of your information.
- **Unique Identifier, Permanent Resident, and Citizenship Information** that helps us to verify your eligibility for Canoo Services, such as your IRCC assigned Unique Identifier, your Permanent Resident number, Citizenship Certificate number, PR expiration date, citizenship date, number of years in Canada, country of citizenship, and location of citizenship ceremony. Your Unique Identifier, Permanent Resident number, and Citizenship Certificate number are encrypted, and are primarily used for fraud prevention. Where it is necessary to view this information in decrypted form (for example, to address a customer service request), it is only made available to authorized ICC personnel under secure circumstances. If this information must be transmitted to IRCC, it is done securely (via SSL).
- **Relationships, Interests, and Preferences** that help us to understand who you are and what types of offers you might like, such as lifestyle, preference, and interest information; the types of offers that interest you; and demographic information (for example, date of birth, gender, country of origin, ethnicity, preferred language of communication, postal code, number of children, and marital status).
- **Camera** function on your device is used to populate information relevant to registering and activating your Canoo membership (such as information from your citizenship certificate). To determine your eligibility for Canoo Services, you may be asked to use your camera to provide a

scan of your permanent resident card or citizenship certification. Canoo uses this scan to populate information relevant for determining eligibility but does not retain any image of your permanent resident card or citizenship certificate. The scan and resulting processing occur on your device. The image of your permanent resident card or citizenship certificate is not transmitted to our servers over the Internet. If you do not wish to use the scanning features available through the Canoo app, you can verify your eligibility in other ways by contacting our customer service team using the secure online form available at <https://canoo.zendesk.com/hc/en-ca/requests/new> or as otherwise indicated when you register.

- **Search Information** meaning the terms or keywords you search for when using the Services on the Canoo app.
- **Transaction Information** about how you interact with the Services, such as the offers you view and redeem including the date and time of the redemption, and the events or programs you prefer; other information about how you use our Services, email, other communications, and applications; and how you interact with Canoo's business partners and service providers.
- **Location and Attendance Information** including province, city, or postal code, as well as precise location data and associated time of day. If you have activated our Services on a mobile device and permitted your mobile device to transmit location data, this allows Canoo to access your GPS location. By activating this feature, you agree to allow Canoo to use your GPS location to notify you about local offers and deals. For example, when you are at or near our partners, you agree that Canoo may collect and use your location information including to tell you about offers that may be nearby, even when the Canoo app is running in the background. Also, if you take advantage of an offer and attend attractions, venues, or events, you will “check in” when you arrive to redeem the offer, and we will email you on behalf of our partner to receive feedback about your experience. Please note that when you redeem an offer, you may also be asked to provide your information directly to our partner through their website, by phone, or in person, and we encourage you to review that partner’s privacy policy, which will govern how they handle your personal information.
- **Mobile Device Information.** We collect certain information about your mobile device when you download the Canoo app or use our Services, including device identifier (such as the Android Advertising ID and the Apple iOS IDFA); user settings; the make, model, and operating system of your device; information about other applications installed on your device; telecom or mobile carrier and service provider; and information about your use of our Services while using the device, such as which features of the app that you use, clicks on notifications or content on the app, and the referring URLs you came from.
- **Communications and other Interactions.** We collect any information you provide when you contact us with questions, comments, concerns, or requests or when you interact with other users on the Service. For example, we collect information on any recommendations you may make to other users of our Services.

- **Information from Our Partners and Third Parties.** We may receive information about you from our partners when you take advantage of their offers. We may also receive information from other third parties in accordance with their respective terms and conditions and/or privacy policies and combine it with information we have about you.
- **Information from IRCC.** We may communicate with IRCC to verify that the permanent resident and citizenship information you provided to us is accurate, including for fraud prevention. We may also communicate with IRCC to determine whether you were granted Canadian citizenship, as one of our goals is to encourage newcomers to Canada to become citizens.

Pixel tags and web beacons

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. When you access these pages or open email messages, the pixel tags and web beacons generate a notice of that action to us or our service providers. These tools allow us to measure the response to our communications and improve our web pages and promotions.

In many cases, the information we collect is used in non-identifiable ways without any reference to Personal Information. For example, we use information we collect about users to optimize our Services and understand its traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Policy governs how we use that information. Additionally, if you have activated one of our mobile-device applications, and if the settings on your location-aware device allow us to receive your location information, we may collect that location information automatically. If we associate location information with other Personal Information, this Policy governs how we would use that information too.

2. How We Use Information

We use the information we collect from and about you to help you discover new offers and learn about events and programs in your area that are available through our partners. We also use the information to enhance your experience using the Canoo app and to enable you to redeem offers and deals through our partners.

We also use information to:

- Set up and administer your registration for our Services, including to establish and evaluate your eligibility for certain offers, events, programs, or services;
- Analyze and understand how you use our Services and interact with the Canoo app to make improvements to our content and/or functionality and develop new features, products, or services;

- Evaluate the types of offers, products, or services that may be of interest to you and provide you with tailored offers, promotions, and information from our partners, including offers based on variables such as stated and anticipated interests, personal characteristics, consumption of advertisements, past searches, past offer redemptions, or location;
- Track redemption of offers;
- Provide customer support;
- Communicate with you and provide additional information which may be of interest to you about Canoo and our partners, such as Canoo news, special offers, updates, and announcements;
- Infer the location of the places you visit most often, determine your frequency or the amount of time spent at these locations, and send notifications when you arrive at or leave those places;
- Give you the most relevant program and event recommendations and alerts. Canoo uses background location tracking to show you personalized content and send you relevant push notifications when you're near a venue with supported offers.
- Send you reminders, technical notices, updates, security alerts, and support and administrative messages, service bulletins, or marketing;
- Provide advertisements and marketing solicitations to you through the Services, email messages, text messages, push notifications, applications, or other methods of communication;
- Administer surveys, contests, or other promotional activities or events sponsored by us or our partners, including contacting past users of the Canoo app;
- Research and analytics, including to measure the quality and effectiveness of the Canoo app and the attitude and behaviours of new Canadians;
- Soliciting donations from current and past users of the Canoo app;
- Combat spam, malware, malicious activities, or security risks; improve and enforce our security measures; and monitor and verify your identity so that unauthorized users do not gain access to your information;
- Improve your experience with the Canoo app;
- Manage our everyday business needs such as application maintenance and management, analytics, fraud prevention, Terms of Use, to comply with the law, and to protect against security risks; and
- Carry out other purposes to which you consent.

In addition to the foregoing, we may aggregate information and use it for any purpose. When we do this, the aggregate information is de-identified or anonymized so that you are not individually identified. We anonymize data through techniques such as what is called “data generalization” and “differential privacy”, and we prohibit attempts to re-identify the data.

3. When and Why Canoo Shares and Discloses Information

Service Providers. We may share information with our service providers that provide services for us to assist us in carrying out the purposes described in Section 2 above. These service providers or third parties may have access to your Personal Information to perform services on our behalf. Some of our service providers may be located in jurisdictions outside of Canada, including the United States, and other countries as applicable, and are therefore subject to the laws of those jurisdictions. We contractually require any third-party service providers to comply with Canadian privacy law and the protections set in this Policy as well as to audit them for compliance.

Partners. We work with various partners so they can provide discounts and other offers to you when you use our Services. To facilitate these activities, we may share aggregate (grouped) information about our users our partners, such as the total number of people who looked at their Canoo page, but we do not share your personal information with our partners. We encourage Canoo's partners to adopt and post their privacy policies. The use of your information by such parties is governed by their privacy policies and is not subject to our control. When you choose to take advantage of an offer from one of our partners, or otherwise interact with a Canoo partner, you agree that we may verify with that partner that you are a valid Canoo member and that the information you provided to them matches the information we collected from your Citizenship Certificate or Permanent Resident Card. We encourage you to read any privacy policy they may have posted on their website.

IRCC. We may communicate with the IRCC to verify that the permanent resident and citizenship information you provided to us is accurate, including for fraud prevention. We may also communicate with IRCC to determine whether you applied for and were granted Canadian citizenship. One of our objectives is to encourage users to become citizens of Canada. This information is encrypted and is securely transmitted using a Secure Sockets Layer (“SSL”) to the IRCC. SSL is a security protocol that creates an encrypted link between a web server and a web browser. To put it simply, this means that our connection to IRCC servers is secure and encrypted and any data we send is safely shared.

Third Parties. Canoo shares information with third parties and service providers, but other than (i) hashed information, device identifiers, or location information (in each case anonymized and/or pseudonymized), and (ii) information shared with third-party service providers who only use the information to assist us with internal management of our Services (for example, to detect and prevent fraud), we do not disclose your contact information or other personally identifiable information. We share information with third parties to assist us in carrying out the purposes described in Section 2 above.

Merger, Sale, or Other Asset Transfers. We may share your information to effect a merger, acquisition, or otherwise, and to support the sale or transfer of business assets. Canoo is operated by the ICC, which is a registered charity. It is therefore highly improbable that Canoo will ever be sold or acquired. In the unlikely event that Canoo is involved in a merger, acquisition, or sale of all or a portion of its assets, or transfer of all or a portion of its assets to another registered charity, you will be notified via email and/or prominent notice on one or more of our Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

As Required by Law, to Enforce Laws and Similar Disclosures. We may also disclose Personal Information: to defend ourselves in litigation or a regulatory action; when required by law or advised to do so by our legal advisors, such as in response to law enforcement agencies, regulators, or a court order; to enforce our rights or protect our property; to protect the rights, property, or safety of others; to investigate fraud; to respond to a government request; or as needed to support auditing, compliance, and corporate governance functions.

Aggregate Data. Canoo may also disclose information about you that is not personally identifiable. For example, we may provide our business partners, or other third parties with reports that contain aggregated data, statistical data, and/or anonymized data.

Consent. We may also share your information with other third parties with your consent.

4. Data Safeguards and Security

Canoo has implemented administrative, technical, and physical measures to protect your personal information from unauthorised access and against unlawful processing, accidental loss, destruction, theft, and damage. The nature of our security controls varies depending on the sensitivity of the information that has been collected; the amount, distribution, and format of the information; and the method of storage. More sensitive Personal Information is safeguarded by a higher level of protection. However, no online activity is ever fully secure or error-free. The transmission of information via the internet is not completely secure. Although we will take steps to protect your personal information, we cannot guarantee the security of your personal information or other data transmitted to or from the Canoo app; any transmission is at your own risk.

Generally, Canoo stores, accesses, and uses personal information in Canada in the province of Quebec . However, some of our service providers may be located outside of Canada including, but not limited, to the United States and Ireland. In those cases, the personal information may be subject to the laws of the jurisdiction in which the information is used, accessed, or stored. We restrict access to your personal information to Canoo employees and authorized service providers who require access to fulfill their job requirements. Canoo cannot control whether your internet service provider routes traffic through network nodes outside of Canada.

5. Your Consent

Consent to the collection, use, and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically, or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide Canoo with information necessary for our Services). Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney).

Generally, by registering for our Services and by downloading, installing, accessing, or otherwise using the Canoo app, you are indicating that you consent to our collection, use, and disclosure of such information

for the purposes identified or described in this Policy and as otherwise permitted or required by law. However, we may seek your consent to use or disclose personal information after it has been collected in cases where we wish to use or disclose the information for a purpose not previously identified or expressed in this Policy.

If you need to provide us with personal information about other individuals, you represent and warrant to us that you are their legal guardian or otherwise that you have their consent.

You may withdraw your consent to our collection, use, and disclosure of personal information at any time, subject to reasonable notice and any legal and/or contractual restrictions. To notify us that you wish to withdraw your consent, please contact us as described below. On receipt of notice of withdrawal of consent, we will inform you of the likely consequences of the withdrawal of consent, which may include our inability to provide certain products, services, or offers for which that information is necessary.

6. Accessing and Correcting Your Information

Keeping your information helps ensure that we provide you with the best offers available through our business partners. Canoo seeks to ensure that any personal information provided by its users and past users is as accurate, complete, and up-to-date as possible in order to fulfill the purpose for which it was obtained.

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, updating, and corrections of inaccuracies in other personal information we have in our custody or control by emailing or writing to us at the contact information set out below. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records and may restrict access to personal information as required or permitted by applicable law or legal process.

You may request that Canoo delete your personal information, or you may withdraw or modify your consent to any ongoing and future collection and use of personal information at any time, subject to legal and technological restrictions, provided that reasonable notice is given to us. Your withdrawal of consent to our collection, use, and disclosure of your personal information may prevent us from providing you, or continuing to provide you, with our products, events, and Services.

7. Data Retention

We will retain your Personal Information where we have an ongoing legitimate business need to do so (for example, while you hold an account with us and for a reasonable period of time thereafter, or to enable us to meet our legal, tax, or accounting obligations). We may retain certain data as necessary to prevent fraud or future abuse, resolve disputes, enforce our agreements, or for legitimate business purposes, such as analysis of aggregated, non-personal information, or account recovery, or if required or permitted by law. All retained personal information will remain subject to the terms of this Policy. If you

request that your name be removed from our databases, it may not be possible to completely delete or anonymize all your personal information due to technological and legal constraints.

8. Third-Party Sites

The Canoo app may contain links or references to other websites that are not controlled by Canno. Please be advised that these third parties are not under our control and Canoo is not responsible for their privacy policies or practices. When you click on such a link, you will leave our service and go to another site. During this process, another entity may collect personal information from you. If you provide any Personal Information to any third party or through any such third-party website, we recommend that you familiarize yourself with the privacy policies and practices of that third party.

9. Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of the Service is directed to children. If you learn that a child has provided us with personal information in violation of this Policy, then you may alert us at the contact information set out below.

10. Changes and Updates to this Privacy Policy

We may occasionally update this Policy. When we do, we will revise the "last updated" date at the top of the policy. If there are material changes to this policy, we will use reasonable efforts to notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification.

11. Our Contact Information

Please contact us with any questions or comments about this Policy, your information, our use and disclosure practices, or your consent choices by email to our Privacy Officer at privacy@inclusion.ca, or our mailing address:

Institute for Canadian Citizenship,
260 Spadina Avenue, Suite 500
Toronto, Ontario M5T 2E4
Attention: Privacy Officer.