



DENTURIST ASSOCIATION OF ONTARIO

PRIVACY POLICY

Approved by the Board of Directors: November 2021

A. INTRODUCTION

About Denturist Association of Ontario

DAO (also “we”, “our” or “us”) is a group of over 500 caring professionals who have come together to promote and advance Denturism through public education and member training. We provide tools to assist Denturists in their practices, as well as provide a unified voice to dental insurance companies and government.

Our Commitment

We are committed to protecting the privacy of our members, employees, clients, Site visitors and other stakeholders. We are accountable for and transparent in how we treat your Personal Information. We do not sell, rent or trade our mailing lists or other Personal Information.

What is Personal Information?

Personal Information is information about an identifiable individual, including any information about you or that can be used to identify you. For the purposes of this Privacy Policy, Personal Information means any information provided to or collected by DAO about an identifiable individual regardless of how the information is collected.

However, Personal Information does not include business contact information, including name, job title or position, work address, work e-mail addresses, work telephone and work facsimile numbers that are collected, used or disclosed solely for the purpose of communicating with a person in relation to their employment or profession.

Scope of this Privacy Policy

This Privacy Policy applies to any Personal Information provided to or collected by DAO through our Site (“Site”), by email, facsimile, postal mail, hand delivered, verbally or any other means.

Purpose of this Privacy Policy

The purpose of this Privacy Policy is to give you information about what Personal Information DAO collects from you, why we collect it and how we use it, as well as what happens if you choose not to disclose certain Personal Information to us. This Privacy Policy is based on the principles outlined in the Canadian Standards Association's Model Code for the Protection of Personal Information, set out in Schedule 1 of Canada's Personal Information Protection and Electronic Documents Act. We will only collect, use and disclose your personal information in accordance with this Privacy Policy.

YOUR USE OF THIS SITE SIGNIFIES YOUR AGREEMENT WITH THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITE OR SUBMIT ANY PERSONAL INFORMATION TO US.

Please read this document carefully.

B. HOW DAO COLLECTS PERSONAL INFORMATION

DAO may collect Personal Information in different ways in the course of our normal operations and providing our services, including:

- Direct interactions – You may voluntarily provide us with Personal Information by registering to access the Site; joining DAO; applying to work for DAO; receiving services or advice from us, obtaining benefits through us; registering to attend a DAO event; requesting information to be sent to you; agreeing to receive emails from us; subscribing for our publications; filling out forms or signing documents; paying accounts or other amounts to us; posting comments on our Site; or communicating with us face to face, over the telephone, by mail, by email, by text, through social media or through other means.
- Automated interactions – when you use our Site we may automatically collect technical data about your equipment and browsing history using cookies and similar technologies (See E below for more information).
- Third-party interactions – we may receive information about you from third parties such as The Denturist Association of Canada, The College of Denturists of Ontario, other regulatory bodies, government agencies, recruitment agencies, credit reporting agencies, insurance companies, benefits providers, other third-party partners, information or service providers, publicly available records or other professionals in connection with the delivery of our membership, benefits and other services.

C. WHAT PERSONAL INFORMATION IS COLLECTED BY DAO

The Personal Information we may collect could include:

- Personal identifiers such as your name, date of birth and gender
- Contact information such as your mailing address, telephone number and email address
- Credit card and bank account information, if you pay to join DAO or purchase goods or services from us. We collect this information via secure payment processing services
- Information about your qualifications, years of service or denturist practice
- Employee records, including employment history and background checks for employees
- Site account information such as your log-in, user name, password information and other security information
- Event information
- Images, including photographs and videos
- Your Site profile including all photos, posts, videos and other content
- Information about your device such as your IP address, location or provider and your usage information and browsing history. (See below for more information)
- Information about your interactions with our content on third-party sites or platforms, such as Facebook

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- Communications such as letters, emails and digital communications that we send to you or that you send to us
 - Personal Information you give us that we did not request (such as Personal Information you voluntarily put into an email to us or in a comments box on our Site).

D. OUR GUIDING PRINCIPLES

1. Accountability:

DAO is responsible for Personal Information under our control. We have designated a Privacy Officer to be accountable for our compliance with these principles and to oversee questions relating to privacy and this Privacy Policy. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the President (as Privacy Officer) at: 9-2285 Dunwin Drive, Mississauga Ontario, L6H 7T6; info@denturistassociation.ca; (905) 608-8090

2. Identifying Purposes:

DAO identifies the purposes for which Personal Information is collected at or before the time the information is collected.

We use the Personal Information we collect to manage our operations and for various purposes associated with the programs and services we provide. We collect, use, and disclose Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances.

The main purposes for which we generally use Personal Information are:

- To manage, oversee and administer our operations, programs, services and activities
- To provide you with membership services and benefits
- To maintain and manage relationships and provide customer service
- To answer questions from members and to respond to inquiries
- To track communications with members and other stakeholders
- To organize, promote and provide conferences, workshops and other events
- To raise awareness of our programs and services
- To monitor the quality of our programs and services and to better understand the needs of our members and other stakeholders so that we can improve our programs and services
- To provide, administer and protect our Site including troubleshooting, data analysis, maintenance and network security
- To deliver relevant Site content and to provide associated functionality such as technical support and password reminders
- To identify and authenticate you in our information system and network
- To send you informational or promotional communications (in compliance with Canada's Anti-Spam Legislation)

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- To record whether you have registered for membership in DAO or subscribed to or unsubscribed from any of our mailing lists or publications
 - To disclose or share your Personal Information when required to comply with legal or regulatory requirements
 - To prevent and detect fraud and other crimes
 - To protect our rights, property or safety or that of our employees, contractors, consultants or any other person
 - For other purposes that we have told you about and for which you have given us your consent
 - To fulfill other purposes permitted or required by law.

We do not collect more Personal Information than we need to achieve these purposes.

3. Consent:

We only collect, use and disclose Personal Information with your knowledge and consent. Your consent may be expressed orally, electronically or in writing or it may be implied. We are committed to obtaining meaningful consent and use clear explanations and plain language to make sure that our consent processes are understandable and user friendly.

You have the right at any time to withdraw or cancel your consent to the collection, use or disclosure of your Personal Information by contacting DAO's President (as Privacy Officer) at info@denturistassociation.ca. Withdrawals of consent only take effect from the date of cancellation. They cannot be retroactive. We will let you know if your withdrawal could have any consequences, such as DAO being unable to provide you with goods or services.

4. Limiting Collection:

DAO will only collect personal information for the purposes identified in this Privacy Policy. If we want to collect information for a different purpose, we will tell you what that purpose is in writing and obtain your consent.

We will not collect, use or disclose more Personal Information than is reasonably necessary to meet the identified purposes. We will limit our collection of Personal Information to that which is necessary for the purposes identified by DAO. We collect Personal Information only by fair and lawful means.

5. Limiting Use, Disclosure and Retention:

DAO will only use or disclose Personal Information for the purposes for which it was collected, unless we have your consent to use it for a different purpose or if we are required by law. If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and obtain your consent.

We keep Personal Information only as long as necessary to achieve the purposes for which it was collected although we may retain certain Personal Information indefinitely if we are required to do so

by Canada Revenue Agency or by our insurers. If you have made a request to access Personal Information, we will keep that Personal Information for as long as is necessary to allow you to fully seek any remedies (exhaust any recourse) that you may have under federal and provincial legislation. We do not disclose or share Personal Information more widely than is necessary to achieve the purposes for which it was collected.

We may share Personal Information with the parties set out below for the following purposes:

- The Denturist Association of Canada and The College of Denturists of Ontario, in connection with membership, licensing and qualifications issues affecting our members
- Third-party service providers, such as those who provide us with group benefits, insurance, IT and system administration services, credit card and payment processing services, e-commerce, telemarketing services, direct mail services and database management services
- Professional advisors, such as lawyers, auditors, bankers and insurers who provide us with legal, accounting, auditing, banking and insurance services
- Government, regulatory authorities, law enforcement, dispute resolution bodies, courts and similar entities to comply with any legal or regulatory obligation, to detect and prevent crimes or to assert or defend legal rights and interests
- Any persons or entities where we have a legitimate business reason for doing so, such as to manage risk, to process payments to you or to someone on your behalf or to perform or carry out the terms of any contract between us
- To the transferee if we transfer, sell or dispose of all or substantially all of our assets or operations
- To anyone we reasonably believe is your agent
- To other third parties if we have told you about them and you have given us your consent.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements. All third-party service providers are required to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions and all applicable legal requirements.

6. Accuracy:

DAO has adequate processes and safeguards in place to keep Personal Information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. We will not routinely update Personal Information, unless such a process is necessary to fulfil the purposes for which the Personal Information was collected. To change or modify any Personal Information previously provided to DAO, contact the DAO President (as Privacy Officer), at info@denturistassociation.ca.

7. Safeguards:

We will take reasonable steps to keep Personal Information in both paper and electronic format protected against loss, theft, snooping, hacking or people collecting, disclosing, copying, using or changing it without authorization. We use security safeguards appropriate to the sensitivity of the information. Our methods of protection include:

- Physical measures - such as areas of restricted access and locked filing cabinets.
- Organizational measures - such as security policies and procedures, employee training on privacy issues, security clearances and limiting access on a "need-to-know" basis.
- Technological measures - such as passwords, encryption, audits as well as strong data security software and systems to protect the Personal Information in DAO's custody from hackers and malicious intruders. Our software is routinely updated to maximize protection of Personal Information.

DAO makes all employees, volunteers as well as third-party service providers aware of the importance of maintaining the privacy and security of Personal Information. All DAO employees and volunteers must sign a confidentiality agreement. We require all third-party service providers to enter into contractual agreements that require them to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements.

We securely destroy Personal information so that reconstruction is not reasonably possible. This prevents unauthorized parties from gaining access to the Personal Information.

While we are committed to protecting your Personal Information, our security practices and technology measures cannot guarantee absolute security of Personal Information and we cannot ensure or warrant the security of any information you provide to us. You can reduce risk to your own Personal Information by using strong passwords, keeping your passwords confidential and following other Personal Information security best practices.

8. Openness:

DAO will make available to individuals specific information about our policies and practices relating to the management of Personal Information, including by posting this Privacy Policy on our Site. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the DAO President (as Privacy Officer) at info@denturistassociation.ca.

9. Individual Access:

If you make a request to the Privacy Officer, we will inform you of the existence, use, and disclosure of your Personal Information and we will give you access to your Personal Information. We will respond to your request within the time periods provided for under applicable laws.

10. Challenging Compliance:

You can challenge the accuracy and completeness of the Personal Information and have it changed or corrected as appropriate if there is an error or omission by contacting the Privacy Officer. We will respond to your request within the time periods provided for under applicable laws. If we identify a gap in compliance, we will take appropriate steps to remedy the situation, including changing our policies and practices if necessary.

E. INFORMATION COLLECTED THROUGH TECHNOLOGY AND SOCIAL MEDIA

When you visit our Site we may automatically collect information about your equipment and browsing history using cookies, server log files and other similar mechanisms. By using our Site, you consent to the use of cookies in accordance with this Privacy Policy.

A cookie is a small text file that is placed on your device when you visit a Site and can last either for the duration of your visit (a “session cookie”) or for repeat visits (a “persistent cookie”). We use the word “cookie” in this Privacy Policy to refer to all files that collect information in this manner.

Some of the cookies we use may be necessary for security purposes, to authenticate you and enable you to use our Site. Other cookies may not be essential but may make it easier for you to use the Site (such as by identifying you, remembering your preferences and helping you navigate the Site). Some cookies are used to help us analyze the use and performance of the Site, as well as for advertising or tracking purposes, including allowing our advertising partners to track and analyze your behaviour on our Site and across the internet (e.g. Google Analytics, which tracks Site usage and traffic)

We collect the following types of information through cookies:

- your IP address
- your approximate geographic location
- the type of operating system you are using (e.g., Windows or Mac)
- the type of device you are using
- the type of browser you are using
- the domain name from which you reached our Site
- which pages you visit on our Site
- the frequency, date and time of your visits to our Site.

In addition to the identified purposes described in this Privacy Policy, we collect and may share this information with our service providers and agents for the purpose of understanding how visitors use our Site, to improve the functionality and content of the Site and to improve your interaction with the Site by making it easier for you to get back to the pages you have looked at the next time you visit.

You have choices when it comes to cookies. All major browsers allow you to disable cookies. If you do not want information collected through the use of cookies, you can disable cookies by changing the setting of your Internet browser. If you disable cookies, you may be unable to use or access some features on our Site.

Our Site may also provide links to third party Sites. Clicking on those links may allow third parties to collect or share information about you. We cannot control these third-party Sites and we are not responsible for the actions or policies of such third parties. You should check the privacy policies of third parties when visiting their Sites or when providing any Personal Information to them.

We may collect Personal Information when you interact with our content on third-party sites or platforms, such as Facebook, Instagram or You Tube. This may include data such as comments or feedback, "likes" or shares, profile data or the fact that you viewed or interacted with our content. If you voluntarily post or submit any information on these platforms, your Personal Information may be automatically included in the posting and may be collected and used by others.

F. PROTECTING THE PRIVACY OF CHILDREN AND YOUTH

We understand that Personal Information relating to children and youth is particularly sensitive, especially the younger they are. Consistent with the position of the Office of the Privacy Commissioner of Canada, we will not knowingly collect Personal Information from children under the age of 13 unless we have the consent of their parents or guardians. We collect the minimum amount of Personal Information of children and youth necessary to achieve our purposes.

If you are a child or youth, you should review this Privacy Policy with your parents or guardians to make sure that you understand and consent to everything in it. IF YOU ARE UNDER THE AGE OF 13, you should not access our Site or provide us with any Personal Information unless your parent or guardian has consented. If we discover that we have collected Personal Information from a child under the AGE OF 13 without parental consent, we will delete that Personal Information.

G. COMPLIANCE WITH CANADA'S ANTI-SPAM LEGISLATION

DAO complies with the requirements of Canada's Anti-Spam Legislation ("CASL"), as amended from time to time at all times, including when: sending emails or texts from a DAO account, email address or domain name, obtaining consent from recipients to send emails or texts, managing and responding to requests to unsubscribe and documenting and retaining records of consent. DAO does not send commercial electronic messages ("CEMs") to any person unless it has express or implied consent from the recipient, the CEM includes identification and contact information for the sender and the CEM has an unsubscribe mechanism. To ensure compliance with CASL, DAO has written policies and procedures, updates its volunteers and staff regarding CASL requirements and keeps records of consents and requests to unsubscribe. Complaints regarding the sending of CEMs and requests to unsubscribe from CEMs should be directed to the DAO President (as Privacy Officer) at info@denturistassociation.ca.

H. OTHER JURISDICTIONS

Some or all of the Personal Information we collect may be transferred to third-party service providers in the course of our normal operations or activities including, without limitation, being stored on servers in cloud-based environments or transferred through other technological measures to trusted third parties to assist us in serving you. Some of our service providers are located outside of Canada and therefore Personal Information may be stored or processed in jurisdictions outside of Canada. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

DAO is not established in the European Union (“EU”), does not offer good and services to individuals in the EU and does not knowingly monitor the behaviour of individuals in the EU. DAO does not knowingly collect or process Personal Information from individuals located in the EU. Individuals located in the EU should not access our Site or provide us with any Personal Information. If you have any questions or concerns about our privacy practices or procedures in relation to other jurisdictions, please contact the Privacy Officer.

If you have any questions or concerns about our privacy practices or procedures in relation to other jurisdictions, or to exercise any of your rights under the applicable law of other jurisdictions, please contact the Privacy Officer. We will let you know if there are any limitations or exceptions that apply.

If you have any questions or concerns about our privacy practices or procedures in relation to other jurisdictions, or to exercise any of your rights under the applicable law of other jurisdictions, please contact the DAO President (as Privacy Officer) at info@denturistassociation.ca. We will let you know if there are any limitations or exceptions that apply.

I. CHANGES TO PRIVACY POLICY

We may make changes to this Privacy Policy from time to time, such as in response to developments and changes in privacy law. When we post changes to this Privacy Policy on our Site, we will change the “last updated” date at the top of this Privacy Policy. If possible, we will post notices of significant changes before they take place. Your continued use of this Site after any changes are made signifies your agreement with the terms of the revised Privacy Policy.