

# THE BLOOM CENTRE FOR SUSTAINABILITY'S POLICY ON THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION ("Privacy Policy")

# **OBJECTIVE & SCOPE OF POLICY**

The Bloom Centre for Sustainability (BLOOM) is committed to maintaining high standards of confidentiality regarding the information provided to us. BLOOM adheres to certain privacy principles to ensure the confidentiality of the Personal Information entrusted to us. This Privacy Policy has been prepared to affirm our commitment to maintaining the privacy of our clients and others and to inform you of our practices concerning the collection, use and disclosure of Personal Information we collect.

#### PERSONAL INFORMATION

For this Privacy Policy, "Personal Information" means any information provided to BLOOM, recorded in any form, about an identifiable individual, or an individual whose identity may be inferred or determined from the information.

#### WHAT IS EXCLUDED FROM PRIVACY PROTECTION

This Privacy Policy does not impose restrictions on: business contact information, including the name, title, business address or telephone number of an employee of an organization; information collected, used or disclosed solely for journalistic, literary or artistic purposes; publicly available information, such as an individual's name, telephone number and address when listed in a directory or made available through directory assistance; or information that is aggregated and not associated with a specific individual, including demographic information and statistics. BLOOM retains the right to use Aggregated Information in any way that it reasonably determines is appropriate.

## **ACCOUNTABILITY**

BLOOM takes the protection of Personal Information seriously. If you ever have any questions, complaints, or concerns about the BLOOM's Privacy Policy or your Personal Information you may contact us at bloom@bloomcentre.com.

# PURPOSE FOR COLLECTION, USE & DISCLOSURE OF PERSONAL INFORMATION

BLOOM may collect Personal Information (including but not limited to your name, address, email address, and telephone numbers) for the purposes of providing services/products, establishing your identity, and billing.

When Personal Information is requested from you, BLOOM will explain the purpose for which it is needed. Under no circumstances will BLOOM sell, trade, barter or exchange for consideration any Personal Information it has obtained.



# LIMITING COLLECTION, USE, DISCLOSURE & RETENTION OF PERSONAL INFORMATION

BLOOM may collect your Personal Information in many forms (hard/soft copy, electronically, facsimile, telephone conversations/recordings, etc.), but will only do so by lawful means and only for necessary purposes that have been disclosed to you.

BLOOM provides general access to web sites, such as our organization's website. Our authorized third party providers may track general information about visitors such as their domain name, IP address and time of visit. They may also collect and aggregate information regarding which pages are being accessed as well as information volunteered by visitors through online surveys or subscriptions to electronic newsletters. This information is used internally, only in aggregate form, to better serve visitors by helping to:

- Manage our sites
- Diagnose any technical problems
- Improve the content of our Web site
- During the course of an individual's use of the Internet, he or she will encounter "cookies" in the
  normal course. Cookies are small files or pieces of information that may be stored in a
  computer's hard drive when an individual visits a web site. BLOOM uses cookies. Most Internet
  browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set
  your browser to refuse cookies or to alert you when cookies are being sent.

Personal Information collected in any form will only be retained by BLOOM so long as it is required: a) for the purpose for which it was collected; b) to be retained by law; c) to address any issues that may arise at a later date. If you choose to opt-out of any use of your Personal Information in accordance with out opt-out policy, we will keep your contact information so that your request can be honoured. When your Personal Information is no longer required for these identified purposes, BLOOM uses secure procedures to destroy, delete, erase or convert the Personal Information into an anonymous form.

## **CONSENT**

Your provision of Personal Information to BLOOM means that you agree and consent that we may collect, use and disclose your Personal Information under this Privacy Policy. If you do not agree with these terms, you are requested not to provide any Personal Information to BLOOM. Certain services can only be offered if you provide Personal Information to BLOOM. If you choose not to provide us with any required Personal Information, BLOOM may not be able to offer you those services.

Consent may be given in different ways such as: a) expressly by signing a document, agreeing through electronic means or verbally; or b) implied by providing the Personal Information voluntarily.

There may be circumstances where you have provided Personal Information for an identified purpose, and BLOOM later needs to use that information for a different purpose. In such circumstances, BLOOM will seek your consent to use the information for the new purpose.



Note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where BLOOM must disclose information without consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal;
- Where BLOOM believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect monies owing to BLOOM;
- Where it is necessary to permit BLOOM to pursue available remedies or limit any damages that BLOOM may sustain; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, BLOOM will not disclose more information than is required.

You have the right to revoke your consent to the collection, use and disclosure of your Personal Information at any time. However, revocation of your consent may result in our inability to provide services to you. We will discuss with you the reason we need your Personal Information and why the revocation of your consent affects our ability to provide the service or product to you.

# **DISCLOSURE, STORAGE & SECURITY**

Currently, BLOOM holds and manages Personal Information principally in its office located in the City of Mississauga. BLOOM allows certain authorized third party providers to track and store certain information about visitors to BLOOM web sites (e.g. domain names, IP addresses and page views) and such information will be stored outside of Canada if the third party provider is located outside of Canada. Personal Information is always subject to the local laws of the jurisdictions within which it is collected, used, disclosed and/or stored, and may be accessed by governmental authorities in those jurisdictions. BLOOM may disclose Personal Information to organizations that perform services for BLOOM.

Personal Information will only be provided to such organizations if they agree by way of contractual or other arrangements to use such information solely to provide services to BLOOM and under the instruction of BLOOM and, regarding that information, to act in a manner consistent with the principles articulated in this Privacy Policy.

Personal Information may also be subject to transfer to another organization in the event of a merger, change of ownership, obtaining insurance or financing. This will occur only if the parties have entered into an agreement under which the collection, use and disclosure of the information is restricted to those purposes that relate to the business transaction, including a determination whether or not to proceed with the business transaction, and is used by the parties to carry out and complete the business transaction.



BLOOM has taken steps to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information ("Data Breach"). BLOOM further protects Personal Information by restricting access to those individuals that the management of BLOOM has determined need to know that information in order that BLOOM may provide its services.

No method of transmitting or storing data is perfectly secure. While the physical characteristics of mail, telephone calls, faxes and transmissions over the Internet are different, each is susceptible to possible loss, misrouting, interception and misuse of the information being communicated or transmitted.

BLOOM attempts to strike a reasonable balance between security and convenience. In communicating with clients and others, BLOOM may request the use of a communication method that is less secure than more inconvenient alternatives.

# **ACCURACY & ACCESS**

BLOOM endeavours to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which BLOOM uses that information. In the event that you believe that your Personal Information is not accurate or you wish access to your Personal Information, you may make a request to BLOOM.

BLOOM will always endeavor to provide timely access to your Personal Information. However, there may be circumstances where access will not be granted. For example, where access would lead to the disclosure of Personal Information of another individual and that individual refuses to provide consent to disclose or information subject to privilege or other legal restrictions. You will be notified in all cases of the reason for the denial of access.

# AMENDMENT OF BLOOM'S PRACTICES AND THIS PRIVACY POLICY

This Privacy Policy has been updated as of April 2014. BLOOM will from time to time review and revise its privacy practices and this Privacy Policy. In the event of any amendment, an appropriate notice will be posted on BLOOM's web site. Policy changes will apply to the information collected from the date of posting of the revised Privacy Policy to BLOOM's web site as well as to existing information held by BLOOM.