



Sustainability Applied™

PRIVACY POLICY

The Bloom Centre for Sustainability (BLOOM) is committed to respecting your privacy and protecting your personal information.

This Privacy Policy outlines our current practices regarding what information BLOOM may collect, use, and secure when you visit our websites and/or sign up to receive BLOOM communications. BLOOM reserves the right to change this Policy at any time. The current version of this Policy is posted on our web site at bloomcentre.com (the "Site"). Please check the Site from time to time to review our current Policy.

Our Privacy Policy Commitment

We are committed to protecting your privacy whether you are browsing for information or conducting business with BLOOM through electronic channels. The handling of all personal information by BLOOM is governed by the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#).

Personal Information

Personal Information is information about an identifiable person such as your name, residential address and e-mail address. The Personal Information Protection and Electronic Documents Act (Canada) ("PIPEDA") provides certain exclusions to Personal Information such as the business address and phone number of an employee of an organization. As used herein, Personal Information has the meaning given by PIPEDA.

You may choose to provide us with Personal Information such as your name, address, phone number, e-mail address and credit card number, if you wish to:

- ▶ Sign up to receive BLOOM communications;
- ▶ Attend a BLOOM event;
- ▶ Participate in a BLOOM project or demonstration project; and/or
- ▶ Participate in BLOOM consultations or surveys.

Personal Information you provide will be used to respond to your message and/or provide you with the requested service or product. Personal Information does not include aggregate information, anonymous information or any other non-personally identifiable information.

Collection of Information

BLOOM may collect Personal Information for the purposes of providing services/products, establishing your identity and billing. Under no circumstances will BLOOM sell, trade, barter or exchange for consideration any Personal Information it has obtained.

BLOOM may collect 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.



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 someone chooses to opt out of any use of Personal Information in accordance with BLOOM's opt-out practice, we will retain that contact information so that the request to **Opt-out** can be honoured. When the 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

The provision of Personal Information to BLOOM means that individuals agree and consent that BLOOM may collect, use and disclose their Personal Information under this Privacy Policy. If individuals do not agree with these terms, they should not provide any Personal Information to BLOOM.

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 an individual has 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 the individual's 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.

Individuals have the right to revoke their consent to the collection, use and disclosure of your Personal Information at any time. However, revocation of consent may result in BLOOM's inability to provide services to that individual. BLOOM will discuss, with the individual, the reason the Personal Information is required and how the revocation of consent affects the ability for BLOOM to provide the service or product to you.

Opt-Out

You have a choice about how we use your Personal Information to communicate with you, and you may opt-out at any time by unsubscribing or changing your preferences.



In accordance with the [*Freedom of Information and Protection of Privacy Act \(FIPPA\)*](#), you always have the opportunity to **Opt-out** of our marketing communications or change your preferences by sending an email message to [**bloom@bloomcentre.com**](mailto:bloom@bloomcentre.com).

Commitment to Data Security

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.

BLOOM uses up-to-date security safeguards to protect its networks and websites from misuse, alteration, copying, disclosure, destruction, monitoring or unauthorized sharing of information and damage. BLOOM's safeguards include the use of security software and encryption protocols that involve physical, technical and procedural controls to protect information.

BLOOM may occasionally, at our discretion, include third party links on our website. BLOOM is not responsible and has no liability for the content and therefore the privacy practices of other websites to which it has links. We encourage you to read the privacy policy statements of each and every website that requests personal information from you.

Disclosure

Currently, BLOOM holds and manages Personal Information principally in its office located in the Town of Oakville, Ontario, Canada.

BLOOM will not disclose Personal Information to other persons, other than as follows:

- ▶ To the extent required for the purposes identified in this Privacy Policy or otherwise described to you at the time of collection;
- ▶ To third parties that assist BLOOM in the course of fulfilling its mandate for administrative or research purposes, provided they agree to safeguard your personal information under terms substantially similar to this Policy and to use it solely for the purposes of providing services to BLOOM consistent with the reasons BLOOM collected it;
- ▶ To organizations providing funding or co-funding to BLOOM programs if relevant to the application review, assessment, administration or management of projects, or in aggregate, de-personalized form, provided in each case the disclosure is consistent with the purpose for which BLOOM collected it;
- ▶ As required by a governmental authority or otherwise under applicable law or regulation;
- ▶ To cooperate with law enforcement or to otherwise protect against violations of criminal or civil laws;



- ▶ Where BLOOM has reason to believe that disclosure is necessary to protect the rights, privacy, safety or property of an identifiable person or group; or
- ▶ As otherwise permitted by PIPEDA including without limitation for non-commercial purposes.

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 of whether or not to proceed with the business transaction, and is used by the parties to carry out and complete the business transaction.

Web Analytics Cookies

BLOOM use web analytics services including Google Analytics to help analyse the use of our websites. These tools use cookies to collect and generate information about your visits to our sites (including your IP address) that is transmitted to their servers in an anonymous form for processing. We study patterns of website activity so we can improve the experience of visitors to our sites.

The use of these tools does not allow us or our analytics service providers to identify individuals.

You can opt out of analytics activity by setting your browser to notify you when a cookie is sent and block analytics cookies if desired. Please consult your browser's Help Menu for instructions. Visiting our website with analytics cookies disabled will have no significant impact on your browsing experience.

Google currently offers a free [Google Analytics Opt-out tool](#) for Internet Explorer (versions 7 and 8), Google Chrome (4.x and higher), and Mozilla Firefox (3.5 and higher).

Accuracy

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 an individual believes that their Personal Information is not accurate or wishes access to their Personal Information, that individual may make a request to bloom@bloomcentre.com.

Privacy Policy Contact Information

For inquiries about this Privacy Policy and/or your Personal Information, including requests to correct personal information, please send an email to bloom@bloomcentre.com.

BLOOM reserves the right to make changes to this policy. Any changes to this policy will be posted at bloomcentre.com.

Last updated: March 2018