CARL PRIVACY POLICY

The Canadian Association of Research Libraries is committed to protecting personal information that we collect, use and disclose in the course of our operations and to complying with all applicable privacy laws and regulatory requirements. This privacy policy ("Policy") sets out how we collect, use, disclose and manage personal information of individuals we interact with, whether that information is collected via our website www.carl-abrc.ca ("Website") or through our other activities and services ("Services"). In this Policy, the terms "you", "user" and "your" refer to a visitor of our Website or user of the Services and the terms "we", "us" and "our" refer to the Canadian Association of Research Libraries.

In this Policy, “personal information” means information about an identifiable individual, such as your name, home address or contact information (including home telephone number and personal email address). Please note that not all information that you share with us is considered personal information. For example, business contact information, such as your work email address, is not considered personal information.

Collection and Use of Personal Information

In the course of providing Services and through our Website, we may collect your personal information. Personal information collected by us is used only for the purposes described in this Policy, or for other purposes which are disclosed to you and to which you consent.

We collect and use personal information from Website users and other individuals based on the information and Services requested. Examples of the types of personal information collected are set out below:

- name and contact details (including phone numbers, addresses, and email addresses), as well as geographic, gender, and other demographic categories related to registration for events or subscribing to Services we provide;
- name, contact details, and other required documentation related to travel;
- name, contact details, curriculum vitae, project applications, and other required documentation relating to grant applications and employment applications;
- name and contact details when you submit an inquiry or request to us through the Website or otherwise communicate with us;
- banking information related to reimbursement of business travel and expenses;
- demographic and accessibility information in support of our goal to foster greater equity, diversity, and inclusion in our programs; and,
- other information that we may collect with your consent or as permitted or required by law.
We use this information:

- to offer and provide our Website and Services to you;
- to keep our members and interested parties up to date on our activities;
- to provide information and updates on subscribed events;
- to arrange group travel;
- to reimburse expense claims;
- to assess candidates for awards and employment;
- to assess accessibility requirements;
- to foster greater equity, diversity, and inclusion in our programs.
- to meet dietary requirements at catered events.
- as allowed or required by law; and
- for other purposes where you have provided consent.

Further, we collect and use personal information from users of our Website in a variety of ways. Specifically, we may collect and use personal information collected through our Website:

- to share information about us, our Website and our Services with you;
- to communicate with you regarding inquiries for information or other requests submitted to us, including through our Website;
- to distribute newsletters and other information that you have requested, including through third party marketing and email platforms; and
- for other purposes for which you have provided your consent.

We may also collect aggregate information which tells us about visitors to our Website, but not the identity of those visitors. For example, we may collect information about the date, time and duration of visits and which pages of our Website are most commonly accessed. The purpose of collecting this aggregate information is to help us administer and improve our Website. We reserve the right to provide our analyses based on such anonymous and aggregated data to third parties.

Additionally, if you apply or inquire about an employment opportunity with us, we may use personal information you provide to process and respond to your application or inquiry.

By submitting personal information to us, you consent to us collecting your personal information.
How We Disclose and Share Your Personal Information

We disclose personal information only as described in this Policy, with your consent or as otherwise permitted or required by law.

We do not sell our membership list, lists of subscribers, or any other personal information that we collect to third parties.

However, to provide our Website and Services, we may sometimes disclose your personal information to third parties, including our service providers. In particular, we may disclose personal information:

- to our service providers, inside or outside Canada, who assist us with website hosting, data warehousing, data analysis, event logging, information technology, customer service, payment processing, user analytics and email delivery and messaging. We use reasonable measures to require our service providers to use your personal information only to perform the applicable services for which they are engaged;

- to third parties where you have authorized us to disclose your personal information to such parties;

- for security breach, loss or fraud prevention, investigation or mitigation purposes; and

- to comply with applicable law, including where we receive a request for personal information and are legally required to disclose it.

Consent

It is important to us that we collect, use or disclose your personal information only where we have your consent to do so or as provided in this Policy. Depending on the sensitivity of the personal information, your consent may be express, implied or deemed. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. Deemed consent is consent we assume in the event that you do not exercise an opt-out mechanism offered to you (such as an unsubscribe link in the footer of our emails). If you choose to provide any personal information to us, we assume that you consent to the collection, use and disclosure of your personal information as outlined in this Policy.

Consent to the collection, use and disclosure of personal information by us may be implied by the fact that you have requested us to provide you with Services, where our collection, use and disclosure of personal information relates to the performance of those Services. If you provide personal information about another person to us, we assume you have the consent of that individual to enable us to collect, use or disclose their information as described in this Policy.

If you do not consent, please do not provide your personal information to us or, where applicable, exercise the opt-in or opt-out options offered. You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our office by email or one of the other means listed below under
“Contacting Us”. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide you with access to some or all of our Website or Services.

We may also collect, use or disclose your personal information without your consent, for example, to comply with applicable laws or court orders.

We assume, unless you advise us otherwise, that by receiving a copy of this Policy or by continuing to access our Website or receive our Services, you have consented to the collection, use and disclosure of your personal information as described in this Policy.

Legal Basis – EEA

In the case of information relating to individuals residing in the European Economic Area (EEA), the legal basis for processing your personal information depends on the circumstances for which it was collected.

In many circumstances, we will seek consent to process your personal information for specific purposes. In those instances, we will not process your personal information other than for those identified purposes without your prior consent or as otherwise permitted by law. However, we may also rely on one or more of the following legal bases (as applicable) to process your personal information:

- to enter into contracts and comply with our contractual commitments to you;
- to pursue our legitimate business interests, including to provide our Services to you and to manage our business relationship; or
- to protect our legal rights and interests and comply with our legal obligations.

Where We Keep Your Personal Information

Personal information we collect is stored and processed by us primarily in Canada, regardless of your country of residence. We also use third party service providers, such as payment processors, event registration systems, and technology partners, to provide the infrastructure required to provide our Website and Services. Those service providers may store and process personal information in Canada, the United States and other jurisdictions. Personal information provided to third parties outside of Canada is subject to the laws of those jurisdictions and may not be afforded the same legal protections that are available in Canada. In those cases, we will put reasonable and appropriate contractual and other controls to protect your personal information, as required by applicable laws.

If you are located in the EEA, we take steps to ensure that adequate protections and appropriate safeguards are in place for your personal information that is processed or stored outside of the EEA. This may include reliance on the adequacy status of a country’s data protection laws, the incorporation of standard data protection clauses in our agreements with third parties or reliance on an EU-US or Swiss-US Privacy Shield registration.
By providing us with your personal information, you consent to the transmission, processing and storage of your personal information in Canada and other countries.

**Security**

We have implemented reasonable physical, organization and technological security processes designed to protect personal information in our control. Technological and operational policies and procedures are in place to protect personal information from misuse, loss and unauthorized modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. While we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us over our Website or the Internet more generally.

**Cookies and similar technologies**

When you visit our Website, a cookie may be placed within the memory of your internet access device. We may use permanent cookies or server-side artifacts to help us track use of our Website by users, including casual visitors to our Website—such as the number and frequency of visits to our pages and which parts of our Website are visited. This information provides us with constructive feedback about our Website so that we can identify the most effective areas and improve the less popular ones.

Cookies cannot determine the identity of individual users. It is a feature of your internet browser which you can disable at any time. However, if you refuse or disable cookies, your access to and experience when using certain areas of our Website may be limited or degraded.

Similarly, we may also collect information regarding the type of device, your operating system, the browser you use, your internet service provider, your domain name, your internet protocol (IP) address, the date and time that you accessed our service, the website that referred you to our Website, the web pages you requested, and use such information to evaluate service performance and service quality and to optimize the user’s experience of our Website. To collect this information, we use cookies, web beacons and similar technologies.

For more information, see our Cookies Policy [insert hyperlink].

**Direct Communications**

We are committed to complying with Canada’s Anti-Spam Legislation.

Where we have your consent or it is lawful to do so, we may provide you with newsletters and other direct communications about issues and content which may be of interest to you. That information may be sent to you by email or post.

If you do not wish to receive newsletters, invitations to events or other informational or promotional communications from us, you may unsubscribe using the mechanism in the email you received or ask us not to contact you for these purposes by contacting our
office by email or by one of the other means listed under the “Contacting Us” heading below.

Access, Corrections and Other Rights

You have the right to know what personal information we have about you and to correct any inaccuracies. We also take reasonable steps to ensure your personal information is accurate for the purposes for which we use it, including to provide you with Services. If there has been a change in your personal information, please inform us as soon as possible to ensure our records are up-to-date.

In certain circumstances, you may have additional rights, including under applicable privacy or data protection laws, to:

- request a copy of your personal information;
- request further information about how we use your personal information;
- request us to restrict our use or disclosure of your personal information;
- object to our use or disclosure of your personal information; and
- request us to delete the personal information we hold about you.

Please direct any such requests by email to our office or by one of the other means listed below under the heading “Contacting Us”.

Your request will be investigated as soon as possible and you will be provided with a written response.

Data Retention

We may retain your personal information as long as is necessary to manage our relationship with you, or fulfill the purposes for which it was collected, or as otherwise required by law.

Links to other Websites

Our Website may contain links to the websites of other organizations which may be of interest to you. Similarly, you may be directed to the websites of other organizations to perform certain functions provided on our Website. Linked websites are responsible for their own privacy practices and you should check those websites for their respective privacy policies.

Changes to the Policy

We reserve the right to change this Policy at any time and will take reasonable steps to advise affected individuals of any material changes, if necessary. You should review this Policy from time to time to ensure that you are aware of and accept any changes made.
Contacting Us

If you have any questions or comments about this Policy, your information, our third-party disclosure practices or your consent choices, please contact our Privacy Officer at privacy@carl-abrc.ca. You may also contact us at:

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