

## Progressive Conservative Party of Ontario

### Privacy Policy

#### OUR COMMITMENT TO PROTECTING YOUR PRIVACY

The Progressive Conservative Party of Ontario and the PC Ontario Fund (collectively, the "**PC Party of Ontario**", "**we**", "**us**", "**our**") understands the importance of protecting your personal information. We have designed our privacy policy and procedures to meet the requirements of the *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") and the *Guidelines for the Use of Electoral Products*, published by Elections Ontario.

#### SCOPE OF POLICY

This Privacy Policy applies to information that you choose to provide to us while accessing or using this website, <http://www.ontariopc.ca/>

This Privacy Policy also applies to personal information derived from the Permanent Register of Electors for Ontario or the Register of Absentee Electors that the PC Party of Ontario receives from Elections Ontario.

We, our members of the Legislative Assembly of Ontario, our candidates for the Legislative Assembly of Ontario, and any person or entity that represents or works for us, our candidates or our members of the Legislative Assembly of Ontario, whether on a paid or volunteer basis, comply with this Privacy Policy.

#### WHAT IS PERSONAL INFORMATION

Personal Information is information about an identifiable individual. It may include information such as your name, address, telephone number and other contact information.

#### SOURCES OF COLLECTION

##### *Information you provide to us*

We collect personal information from a variety of sources, as described below.

- *Mailing Lists* When you join any PC Party of Ontario mailing list, we collect your name, contact details, email address, and certain other information. We may also purchase or rent mailing lists from trusted third party service providers. You may request that your email address be removed by sending your request to [unsubscribe@ontariopc.com](mailto:unsubscribe@ontariopc.com)
- *Door to Door and Telephone Canvassing* We may collect your personal information when we contact you either through door to door canvassing or through telephone solicitation.
- *Surveys/Polls* Your opinion matters to us and from time to time we may use surveys to help us understand which issues you are interested in. We may aggregate or compile information we receive in response to these surveys (including your comments) and make this available to the public (e.g., to make a statement that 99% of individuals answered "**X**"). This aggregated information will not disclose your email address or information that may identify you.
- *Donations* We may also collect personal information from you when you contribute money to the PC Party of Ontario, whether you donate online, by mail or at one of our events. When you make a contribution to us through our website, we use trusted payment

processors to process your transaction. The PC Party of Ontario will never access, store or otherwise retain your credit card/payment card information. However, as required by Elections Ontario, we are required to collect and report the name and mailing address of individuals whose contributions exceed \$20. We also make a note of your telephone number and email address when you make a contribution, which helps us to contact you quickly if follow-up on your contribution is necessary.

- Events If you attend or sign up for one of our fundraising or other events we may collect your name, contact details, and email address.
- Website Analytic Tools Like many other websites, we may also use passive tracking technologies and third-party analytics tools to collect information from you. These tools may automatically monitor and track information in relation to activities on our website, including the Internet Protocol ("IP") address of your computer, the IP address of your Internet Service provider, the date and time you access the website, the Internet address of the website from which you linked directly to the website, the operating system you are using, the pages of the website you visit, etc. We might also use Cookies to understand your usage of the website and to improve its contents. A "**Cookie**" is a text file that websites send to a visitor's computer or other Internet-connected devices to uniquely identify the visitor's browser or to store information or settings in the browser. Cookies make it more convenient for you to use our website. For example, the information provided through Cookies is used to recognize you as a previous user of the website to offer personalized web page content and information for your use and to otherwise facilitate your experience. A Cookie may remain on your computer, phone or browser after the session finishes. You may choose to decline cookies if your browser permits, but doing so may *affect* your use of the website and your ability to access certain features of the website or engage in transactions through the website.
- Social Media We may also collect information if you engage with our website through a third-party social media platform. For example, if you tag us in content, we and other users of the social media platform may be able to view your profile. Your use of third party platforms remains subject to the terms and conditions and privacy policies you have agreed to with such platforms.
- Service Providers We work with a variety of trusted service providers such as polling firms, fundraisers and companies that assist us in identifying and reaching out to our supporters. We may receive your name, contact information and email address from these service providers where you have previously provided your consent for this purpose.

### ***Information we receive from Elections Ontario***

Elections Ontario supplies us, our members of the Legislative Assembly of Ontario, and our candidates for the Legislative Assembly of Ontario with personal information from the Permanent Register of Electors for Ontario and from the Register of Absentee Electors.

### **PURPOSES OF COLLECTION**

#### ***Information you supply to us***

Through the various sources described above, the PC Party of Ontario collects personal information from you for the following purposes:

- to communicate with you so you can get more politically involved with the party;
- to facilitate your participation as a candidate, volunteer or a fundraiser and for general campaign purposes;
- to solicit donations from you and to issue tax receipts;
- to invite you to events; and
- to provide you with updates about our activities and issues, and provide you with information updates to which you subscribed or that you have requested.

As a result, when you communicate with us, we may ask you to provide information such as your name, address, phone number and email address in an effort to improve our ability to work with you. If you choose not to give us any information, we will not be able to provide you the requested content or give you access to timely information regarding issues that may be important to you.

#### ***Information we receive from Elections Ontario***

Any information that we receive from Elections Ontario will only be used for electoral purposes as permitted under the *Election Act* (i.e., communicating with electors, soliciting elector contributions or campaign support during the writ period of an election and recruiting party members). We will not use this information for commercial purposes.

#### **LIMITING USE, DISCLOSURE AND RETENTION**

##### ***Information you supply to us***

We strive to use your personal information in a responsible and respectful manner. We retain any personal information that you provide for as long as required to fulfil the purposes for which we collected it, unless otherwise stated. By completing any of our online forms, you are consenting to our collection and retention of the information you provide. We limit the collection of personal information to that which is necessary to fulfill the purpose for which it was collected.

We maintain security systems to safeguard your personal information from unauthorized access, disclosure, or misuse, and from loss or unauthorized alteration. We take physical precautions for your safety such as shredding all paper documentation containing personal information once it has been recorded in our electronic systems. Our website has a number of security measures in place to protect against the loss, misuse or alteration of the information under our control. Computer systems have restricted access limited only to those persons and organizations necessary to its proper functioning. Highly sensitive data, including payment information you enter online to make a contribution, is additionally secured through the use of encryption, such as the Secure Socket Layer (SSL) protocol. All information will remain confidential to the PC Party of Ontario, its riding associations and to individuals working and volunteering for us.

##### ***Information we receive from Elections Ontario***

We have implemented administrative safeguards to protect the personal information we receive, in both print and electronic form, from Elections Ontario. Such personal information will only be disclosed to our members of the Legislative Assembly of Ontario, our candidates for the Legislative Assembly of Ontario and other authorized representatives of the PC Party of Ontario on a "need to know" basis, after we obtain written acknowledgement from the recipient that they will only use the information for electoral purposes and not for any commercial purposes. Our members of the Legislative Assembly of Ontario and our candidates for the Legislative Assembly of Ontario likewise require the same written acknowledgement from any of their authorized representatives to whom they disclose this information. These written acknowledgements contain

provisions permitting us, our members of the Legislative Assembly of Ontario, and our candidates for the Legislative Assembly of Ontario, as applicable, to terminate the supply of this information at any time and to require the return of all copies of the information upon termination.

The PC Party of Ontario, our members of the Legislative Assembly of Ontario, and our candidates for the Legislative Assembly of Ontario will track the following with respect to personal information supplied to them by Elections Ontario:

- The date of distribution of this information;
- The name of the person(s) or entities to whom the information was disclosed;
- The format in which the information was provided;
- Confirmation that the authorized third party has signed the written acknowledgement described above; and
- Confirmation of the date of which the copy or copies of the information was returned by the third party.

We, our members of the Legislative Assembly of Ontario, and our candidates for the Legislative Assembly of Ontario have also implemented physical and technological security measures in an effort to protect personal information we receive from Elections Ontario. For example:

- we train our employees and volunteers on the importance of safeguarding personal information;
- we restrict access to personal information to those employees or volunteers who need access for authorized electoral purposes;
- we protect personal information in print form by keeping it in locked filing cabinets when not in use and by securely packaging and sealing it while it is in transit; and
- we protect personal information in electronic form using technological means such as firewalls, access controls, and encryption.

When personal information received from Elections Ontario is no longer required for electoral purposes, we securely destroy or permanently delete copies of such information. For example, where we rely on secure shredding service providers to destroy personal information in print form, we require those service providers to cross-cut shred and to provide us with a certificate of destruction.

## **ACCESS, UPDATES & CORRECTIONS**

We recognize that your information may change from time to time (such as if you move). You can always contact us to access, update or correct information we may have about you.

## **DATA BREACH**

In the event that any personal information under our control is lost or stolen, or is collected, used, disclosed, retained or disposed of without authorization, we will:

- Take measures to contain the breach, identify the source of the breach and mitigate any harm resulting from the breach;
- Document the circumstances that led to the breach; and
- Review our internal policies, processes and procedures to prevent future breaches.

If the information affected by the breach was information originally supplied to us or our candidates or members of the Legislative Assembly by Elections Ontario, we will notify the Chief Electoral Officer for Ontario.

Additionally, where we believe that any loss, theft or compromise of personal information may pose a real risk of significant harm to any individual, we will notify any affected individuals.

### **PC PARTY OF ONTARIO - CANDIDATES' RESPONSIBILITIES**

All PC Party of Ontario candidates for the Legislative Assembly and their employees and agents will be required to comply with this Privacy Policy. With respect to any personal information that is supplied by Elections Ontario our candidates also are required to:

- Limit their use of any personal information received from Elections Ontario to electoral purposes only as required under the *Election Act* and to not use such information for any commercial purposes;
- Obtain written acknowledgements from each third party to whom they disclose such information that the information may only be used for electoral purposes and not for any commercial purposes;
- Track the distribution of all copies of the information that was supplied to the candidate;
- Promptly notify the PC Party of Ontario of any loss or theft of such information and otherwise comply with the breach notification obligations set out above; and
- Ensure the secure destruction of all copies of the information that was supplied to the candidate, once its use is no longer authorized.

### **PC PARTY OF ONTARIO - LEGISLATIVE ASSEMBLY MEMBERS' RESPONSIBILITIES**

In addition to the responsibilities of PC Party of Ontario candidates above, PC Party of Ontario members of the Legislative Assembly and their employees and agents are also required to comply with the applicable filing requirements of the *Guidelines for the Use of Electoral Products*, published by Elections Ontario.

### **ACCOUNTABILITY**

The PC Party of Ontario has appointed a Chief Privacy Officer ("CPO") who is responsible for administering and overseeing our privacy program. The CPO's role includes:

- Developing this privacy policy;
- Implementing and maintaining this privacy policy, including ensuring appropriate processes are in place to safeguard personal information;
- Managing privacy training;
- Responding to requests for access to and correction of personal information; and
- Responding to inquiries and complaints.

### **QUESTIONS?**

If you have any questions, concerns or complaints about this privacy policy or our practices, please contact us by using our Get In Touch page [<https://ontariopc.ca/contact/>]. We will respond to your request or investigate your concern as quickly as we can.

The PC Party of Ontario is committed to abiding by and enforcing this Privacy Policy.

Last Updated December 1, 2022.



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David Garland, Executive Director & Chief Privacy Officer



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Date