



Mitacs Privacy Policy for Websites, Products, and Services

APPROVED BY BOARD OF DIRECTORS: NOVEMBER 2023



Privacy Policy for Website, Products and Services

A more innovative and productive Canada will be built by creative and entrepreneurial citizens generating new ideas and working together to make them a reality. Mitacs is passionately committed to supporting this innovation. In designing our programs, processes, systems, and procedures, Mitacs will take best efforts to design around the interests and needs of individual users, who have the greatest vested interest in the management of their own personal information. We seek to ensure visibility and transparency of personal information collected by Mitacs, as they are essential to establishing accountability and trust.

The purpose of this Privacy Policy (the **Policy**) is to inform our applicants, participants and other individuals on how we collect, use, disclose and protect personal information in connection with our products, services and our website www.mitacs.ca and any of its subdomains (the **website**). This outlines Mitacs's privacy practices regarding the collection, use, disclosure, and retention of personal information for which it has **custody and control**. The Policy articulates the principles and practices that Mitacs employees, Board of Directors, and **third parties**, including contractors and other service providers engaged by Mitacs, are required to abide by in the management of personal information. We want you to be aware of when, and the purpose for which, your personal information is being collected.

If you are a Mitacs applicant or participant and wish to learn more about how your data can be collected, used and disclosed in the context of Mitacs programs, please consult the *Privacy Policy for Applicants and Participants* [[Mitacs Policies: Guiding Excellence and Accountability - Mitacs](#)]. For the purposes of this Policy, personal information means information about an identifiable individual.

This Policy is effective as of the last updated date above and may be revised from time to time or as part of Mitacs's corporate policy review cycle. If Mitacs intends to use, disclose or retain personal information for purposes materially different than those described in this Policy, we will make reasonable efforts to notify you of this, including by posting the revised Policy on our website. A current version will be made available.

By accessing and continuing to use the website or Mitacs's services, you automatically expressly consent to the collection, use and disclosure of your personal information in accordance with this Policy.

Purpose of Privacy Policy

Mitacs is committed to complying with all applicable access to information and privacy laws. A privacy policy is integral to any privacy management program. At Mitacs, we take responsibility for the personal information in our possession.

Mitacs is defined as an “organization” under British Columbia’s *Personal Information Protection Act*, 2003 (**PIPA**) and must comply with the requirements under this Act, as well as other provincial and federal laws which may apply. The purpose of PIPA is to govern the collection, use, and disclosure of **personal information** by organizations in a manner that recognizes both the right of individuals to protect their personal information and the need of organizations to collect, use, or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances. Among other requirements under PIPA, organizations must develop and follow policies and practices that meet the purpose of the Act.

Our privacy practices are also consistent with privacy laws in Canada, and other jurisdictions, including the European General Data Protection Regulation (**GDPR**), since Mitacs also offers programs and services to European Union (**EU**) data subjects (see *What are my rights as an EU data subject?* below). Furthermore, many of the funding agreements that Mitacs has signed reference other provincial access to information and privacy legislation with which Mitacs must comply.

Collection and Use of Personal Information

In order to navigate this website or interact with us in another capacity, we may request that you provide certain personal information. We only collect personal information that is necessary to fulfill the purposes stated in the section below. The situations where we may collect and use personal information include some of the following:

- If you **contact one of our Business Development representatives for a prospective project**, we may collect your name, email address, phone number, job title, and other information about your institution. We use this information to respond to your request or comment. If you send us emails or letters, we may collect such information in a file specific to you.
- If you **participate in one of our events or trainings**, we may collect your name, login information and email address to confirm your participation in the event or training, to give you access to the course or training or keep you updated on any change to the activity. Where possible, we indicate which fields are required and which fields are optional.

- If you **send your application with respect to an employment opportunity** posted on our website or somewhere else, we will collect your name, email address, CV and any other information you provide, including employment history. We use this information to review and respond to your application.
- If you **subscribe to a mailing list**, we will collect your name, job title, institution name, department, province, and email address to send you our newsletter and/or our calls for proposals, depending on the options you choose. Even after subscribing to one or more newsletters, you may elect to modify your preferences by following the “Unsubscribe” link provided in an email or communication received.
- When you **visit our website**, we may collect information about your visit through cookies and similar technologies (see *Cookies and Other Tracking Technologies* [below](#)).
- If you **contact us** by phone, mail, or email, we may compile information regarding the reason why you are contacting us, and the contact information you choose to provide us. We use this information to respond to your request or comment. If you send us emails or letters, we may collect such information in a file specific to you.

Mitacs Principles and Practices around Personal Information

1. Mitacs will not collect, use or disclose personal information about an individual unless: a) the individual provides consent; b) it is authorized by legislation; c) consent is deemed to be given under legislation.
2. Mitacs limits the collection, use, disclosure, and retention of personal information to what is necessary for Mitacs’s use, or as required by applicable laws or regulation. Mitacs will follow its own retention periods or schedules for documents, based on financial, legal, regulatory, operational, audit, or archival requirements.
3. The primary purposes for which Mitacs collects, uses, discloses and retains personal information are as follows:
 - To communicate information about our programs and services and establish or maintain ongoing relationships with individuals;
 - To meet legal, regulatory, insurance, audit, security or contractual requirements, such as providing information about program participation and outcomes to our funding partners;
 - To evaluate an applicant’s eligibility for a Mitacs program or award;

- To administer Mitacs events and programs;
 - To conduct research and analysis on, evaluate and enhance our programs and services;
 - In the context of a business transaction, in connection with the proposed or actual financing, securitization, insuring, sale, assignment, or other disposal of all or part of Mitacs, or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of Mitacs, or our business or assets, may use and disclose your personal information for similar purposes as those described in this Policy;
 - To establish and manage the employment or other work relationship with employees; and
 - For other purposes Mitacs deems necessary or as required by law.
4. Mitacs can rely on implied consent if the individual is aware of the purpose for the collection, use, disclosure, or retention of their personal information and, if the purpose is consistent with those listed above and that which a reasonable person would expect. This is not the case with EU data subjects under GDPR.
 5. Mitacs will get explicit consent from the individual for secondary purposes (i.e., those purposes that have not been identified in this policy), unless it is so similar to those already consented to that it would be expected by the individual (i.e., consistent with the original purpose).
 6. Mitacs will comply with an individual's request to withdraw consent from the collection, use, disclosure or retention of their personal information, unless it will interfere with a legal or contractual obligation.
 7. Mitacs makes reasonable effort to ensure that personal information collected by or on behalf of Mitacs is accurate and complete.
 8. Mitacs acknowledges that individuals have the right to access and correct their personal information. Mitacs will share information about the existence, use, and disclosure of an individual's personal information in its custody and control. Mitacs does not charge fees to access information if the requestor is an employee; however, for all other individual requests, Mitacs may charge a fee.
 - 9.** Mitacs acknowledges that EU data subjects have additional rights under GDPR to their personal information under Mitacs's custody and control and has incorporated these additional rights into its management of personal information.

10. Mitacs may transfer personal information to **third-party service providers** (including affiliates acting in this capacity) that perform services on our behalf, for the following purposes: data hosting and processing,
11. Mitacs uses reasonable physical, administrative, and technical safeguards to protect personal information, from unauthorized access, collection, use, disclosure, copying, modification or disposal, or similar risks. Mitacs takes reasonable measures to limit access to this data to authorized employees and contractors who need to know that information in order to perform their duties.
 - Please note that the safety and security of your information is also your responsibility. If you have chosen a password to access a Mitacs platform, you are responsible for keeping this password confidential. We ask that you do not share your password with anyone. We also ask that you submit applications through the appropriate platform when available, rather than by email. However, please note that no security measures can offer absolute security.
12. Mitacs follows its protocol in the event of a privacy breach.
13. Mitacs must destroy documents containing personal information or make the information anonymous as soon as it is reasonable to assume the following:
 - The purpose for which the personal information was collected is no longer being served by keeping the personal information, and
 - It is no longer necessary to keep the personal information for legal or business purposes.

Accessing, Correcting and Deleting Personal Information

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

You have the right to request access to and/or correction of the personal information Mitacs holds about you. If you wish to review, verify, correct, or withdraw your consent to the use of your personal information, you may also send us an email to privacy@mitacs.ca to request access, correction, or deletion of any personal information you have provided to us. Mitacs may charge a fee to process requests to access information. We may not accept a request to change information if we believe that the change would violate a law or legal requirement or result in incorrect information.

Before providing you with access to your personal information, we may ask you for specific information to help us confirm your identity and right of access, and to provide you with the

personal information we hold about you, or to make the requested changes. In some cases, applicable law requires us to refuse to provide you with access to some or all of the personal information we hold about you, or that we may have destroyed, erased or made anonymous in accordance with our legal record-keeping obligations and privacy best practices.

Please note that if you request deletion of certain information, we may not be able to provide you with some services. We will explain the consequences of deletion at that time to assist you in your decision.

If we are unable to provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions. Such restrictions may include, for example, information that would reveal personal information about another individual or confidential business information, or that would be prohibitively costly to provide.

International Storing and Transfer of Personal Information

In order for us to carry out our activities, your personal information may be processed by us (or our third-party service providers) outside of Canada. We ensure that our third-party service providers comply with applicable privacy and data protection laws, and implement contractual clauses that ensure the protection of privacy rights, as applicable.

By submitting your personal information or engaging with the website, you consent to such transfer and storage.

Personal Information of Minors

Our programs and services are not designed for use by or directed to children. If you have reason to believe that a child under the legal age in your jurisdiction has provided personal information to Mitacs, please contact us and we will securely delete the information from our databases to the extent required by law.

Cookies and Other Tracking Technologies

When you access our website whether by computer, mobile phone, or other device, we automatically collect certain information about your use of our website (this information may include without limitation: geographical location and IDs of your computer, mobile, or other device; bandwidth used; system and connection performance; browser type and version; operating system; referral source; length of visit; page views; IP address or other unique identifier for your computer, mobile phone, or other device; your mobile carrier) using technologies such as cookies.

A “cookie” is a resource created by your browser in order to remember certain pieces of information for the web server to reference during the same or subsequent visit to the Mitacs

website. Cookies are used for many purposes, such as to track language preferences, provide customized web page content, and display website navigation history. A third-party cookie is one that is set by another website and often used to track users across multiple websites. Mitacs uses third-party cookies to establish or maintain ongoing relationships with visitors to our website. Visitors to the Mitacs website who have concerns about these cookies can activate third-party cookie blocking offered by a great majority of browsers.

Mitacs collects and analyzes website usage data strictly for internal purposes, and we use Google Analytics, among other services, to analyze the data. We do not sell, rent, exchange, or otherwise disclose any personal information that we collect about our website visitors to third parties, except in the case of a malicious attack or as required by law.

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or delete certain cookies. You may be able to manage other technologies in the same way that you manage cookies using your browser's preference. Google Analytics may also be deactivated, once you download the [browser add-on](#) available for that purpose.

Links to Other Websites

Mitacs may offer links from our website to other websites controlled by separate entities. However, we are not responsible for, nor do we accept any liability for how such other entities collect, use and disclose personal information. You should consult the privacy policies of these other websites before providing any personal information.

Rights of EU Data Subject

In addition to rights under PIPA with respect to an individual's personal information noted above, those residing in the EU, whose personal information is in Mitacs's custody and control, have certain additional rights under the GDPR:

- **Restrictions on further processing:** EU data subjects have the right, where there is a dispute in relation to the accuracy or basis of processing of their personal information, to request a restriction on further processing by Mitacs.
- **Erasure:** EU data subjects have the right to erasure of their personal information ("right to be forgotten") in certain circumstances.
- **Data portability:** EU data subjects have the right to request that personal information that they have provided to Mitacs be returned to them or be provided to another third party of their choice, in a structured, commonly used and machine-readable format.

- **Automated decision-making:** EU citizens have the right not to be subject to a decision based solely on automated decision-making (e.g. AI/machine learning algorithms). In connection with such right, EU data subjects may have the right to request human intervention with respect to such automated decision-making, as well as express their point of view or contest any such automated decision-making by Mitacs.

Contact Us

If you have questions or concerns about our privacy commitment or how we handle your personal information, or if you would like changes to the communications we send or access to your personal information, please contact Mitacs's Chief Privacy Officer (**CPO**).

The Chief Operating Officer (**COO**) is designated as CPO. If anyone wishes to make a complaint about Mitacs's personal information management practices or its compliance with this Policy, a written complaint should be sent to the attention of the CPO. The CPO will ensure that all complaints are investigated, and that responses are made to all written enquiries. If a complaint is found to be justified by the CPO, Mitacs will take reasonable steps to address the situation and to amend this Policy or procedures as appropriate.

Contact information:

Chief Privacy Officer
Mitacs Inc.
Suite 301, Technology Enterprise Facility
University of British Columbia
6190 Agronomy Road
Vancouver, BC, V6T 1Z3
Email: privacy@mitacs.ca
Phone: 604-822-9189

Right to Complain Under BC PIPA

Under PIPA, individuals have the right to complain to the Office of the Information and Privacy Commissioner for British Columbia (OIPC).

Office of the Information and Privacy Commissioner for British Columbia (OIPC)
PO Box 9038 Stn. Prov. Govt.

Victoria, B.C. V8W 9A4
Telephone: (250) 387-5629
Vancouver: (604) 660-2421
Elsewhere in BC: (800) 663-7867
Email: info@oipc.bc.ca