



Mitacs Privacy Policy for Program Applicants and Participants

APPROVED BY BOARD OF DIRECTORS: NOVEMBER 2023



Mitacs Privacy Policy- Applicants and Participants

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 make reasonable efforts to design around the interests and needs of individuals, who have the greatest vested interest in the management of their own personal data. We seek to ensure visibility and transparency of personal information collected by Mitacs, as they are essential to establishing accountability and trust.

To this effect, Mitacs takes steps intended to meet privacy principles and requirements with respect to personal information under applicable privacy legislation. Mitacs is defined as an “organization” under B.C.’s *Personal Information Protection Act, 2003 (PIPA)* and must comply with the requirements under this Act, as well as other provincial and federal privacy 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.

Since Mitacs also offers programs and services to European Union (EU) data subjects, Mitacs must comply with the General Data Protection Regulation (GDPR) (see our section on *Rights of EU data subjects* for more information). Mitacs is committed to complying with all applicable access-to-information and privacy laws.

Purpose of Privacy Policy

The purpose of this privacy policy (the **Policy**) is to inform our applicants and participants on how we collect, use, disclose, and protect personal information in connection with our programs, our services and our website www.mitacs.ca (the **Site**). 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’s 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. 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 Site. A current version will be made available.

By sending your application to Mitacs and/or accepting to participate in one of our programs, you have consented to the collection, use and disclosure of your personal information in accordance with this Policy and confirmed that you have read this Policy prior to submission of your information.

Collection and Use of Personal Information

In order to participate in our programs 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 provide you with our different services. Where possible, we indicate which fields are required and which fields are optional.

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.

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.

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).

The situations where we may collect and use personal information include some of the following:

- If you **create an account on one of our platforms to apply to one of our programs**, we may collect your name, email address, phone number, CV, and other relevant information about your application to the program. Information from your account will be used to evaluate your application to participate in one of our programs.
- If you **become a program participant**, we may collect your name, address, date of birth, institution, CV, financial information for payment of grants, information about your project and your participation in it, and any other information that may be necessary

during the course of your participation in one of Mitacs's programs. This information may be provided by you, or your supervisor in the program.

- If you **contact one of our Advisors 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, log in information, and email address to confirm your participation in the event or training, to give you access to courses or training, or to keep you updated on any change to the activity. Where possible, we indicate which fields are required and which fields are optional.
- 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 their preferences by following the "Unsubscribe" link provided in an email or communication received.
- When you **visit our Site**, we may collect information about your visit through cookies and similar technologies (see our section on *Cookies and other tracking technologies* for more information).
- 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 with. 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.

We may also use the personal information we collect to do the following:

- To communicate information about our programs and services and establish or maintain ongoing relationships with individuals;
- 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;
- For other purposes Mitacs deems necessary or as required by law.

Unless otherwise permitted or required by applicable laws or regulations, we will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, auditing, or archival requirements. Furthermore, Mitacs does not sell your information to third parties.

Disclosure of Personal Information

Note that Mitacs personnel may not share personal information in proposals, except for information identified as being public in the proposal template, with few exceptions (such as providing information to our government funders). This is our normal course of business. In addition, we ensure that third-party peer reviewers agree to keep the information in any application confidential before they have access to the application.

Mitacs will only disclose your personal information with your consent or if it has legal authority to do so, such as in the following contexts:

- We may share your application to **third-party peer reviewers** for the evaluation of applications, who must agree to keep the information in any application confidential before they have access to the application.
- We may transfer personal information to **third-party service providers** (including affiliates acting in this capacity) that perform services on our behalf, such as data hosting and processing.
- We may use and disclose personal information 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.
- Mitacs may disclose personal information as necessary to **meet legal, regulatory, insurance, audit, security requirements, or contractual requirements**, such as providing information about program participation and outcomes to our funding partners, or for other Mitacs necessary purposes, etc.

Confidential Information

Confidential Information is generally information in any format or medium relating to the business and management of a company or organization, that includes proprietary and/or trade secret information and accounting records, such as products, processes, technology, software,

business operations information, client lists, technical and engineering data, technical concepts, test data and test results, the status and details of research and development of products and services, and information regarding acquiring, protecting, enforcing and licensing proprietary rights (including patents and copyrights), **that is identified to Mitacs as being confidential**. Note that this is a general definition; a confidentiality or non-disclosure agreement (NDA), which must be signed before Mitacs takes possession of confidential information, will contain a definition that takes precedence over the definition in this policy.

Mitacs takes the protection of Confidential Information seriously, and therefore limits the situations in which we will accept or have access to Confidential Information. Currently, none of our systems are certified for security standards (such as being PCI or ISO27001 compliant), so we reduce the risk as much as possible through limiting the Confidential Information in our systems.

Under the following circumstances, we can accept or be granted access to Confidential Information (contingent on certain requirements, including the signing of an appropriate NDA, discussed here and in the following sections):

During discussions with organizations to determine the feasibility of a Mitacs project and to enable identifying potential project participants, we can be provided access to electronic versions of Confidential Information. The Confidential Information must be identified as such. Any hard copies of Confidential Information must be provided to Mitacs staff on site at your organization and collected before staff leave. NDAs must be signed before staff have any access to Confidential Information.

We will not generally accept Confidential Information in any program applications. The applications must go to third-party peer reviewers and the information is also seen by the university Office of Research Services or its equivalent and all participating professors, students, and companies, and potentially support staff as well, so should not contain sensitive information. However, when the fact of your organization working on the project must not be disclosed publicly and/or must not be disclosed to third-party peer reviewers, we can ensure that the company name is removed from the application before it goes for third-party review and ensure it does not go on our website. (Note that we are generally expected to include company names in reports to our government funders, who may make the reports public.)

Any exceptions to these circumstances must be negotiated between your organization and Mitacs. Exceptions will only be considered when the project or collaboration is deemed to be of significant strategic value to Mitacs. Depending on the circumstances, exceptions may require

the implementation of new procedures or setups, which may delay application submissions and/or reviews and approvals.

International Storing and Transfer of Personal or Confidential Information

In order for us to carry out our activities, your personal or Confidential 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 Site, you consent to such transfer and storage.

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 Sites

Mitacs may offer links from our Site 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.

Security

We take reasonable steps to protect the personal information in our custody or control using physical, administrative, electronic, procedural, and technical security measures that are appropriate with regard to the nature and sensitivity of the information. We take reasonable measures to limit access to this data to authorized employees and contractors who need to know the 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.

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 we hold about you.

You have the right to request access to and/or correction of the personal information Mitacs holds about you. If you are a program participant, and you wish to review, verify, or correct your personal information, you may access your online portal to access or modify your information.

In addition, 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 at 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.

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

If you are an applicant, former applicant, or a program participant and wish to withdraw your consent to the use and storing of your personal information, you may send us an email at privacy@mitacs.ca to request the 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 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.

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 about another individual that would reveal their personal information or confidential business information, or would be prohibitively costly to provide.

Rights of EU Data Subjects

In addition to rights under Canadian laws with respect to an individual's personal information noted above, those residing in the EU, whose personal information is in Mitacs' 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 data, to request a restriction on further processing by Mitacs.
- **Erasure:** EU data subjects have the right to erasure of their personal data ("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 this 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.

Privacy Policy Changes

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 Site. A current version will be made available.

Your continued provision of personal information or use of our Site following any changes to this Policy constitutes your acceptance of any such changes.

Contact Us

If you have any questions or concerns about the Policy, or if you wish to make a complaint, please contact Mitacs's Chief Privacy Officer:

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

Complaint to the Office of the Information and Privacy Commissioner for British Columbia (OIPC)

Under PIPA, individuals have the right to complain to the Office of the Information and Privacy Commissioner for British Columbia (OIPC). Individuals also have the right of access to their personal information and the right to correction of their personal information. PIPA also provides protection for an employee who, in good faith, reports contraventions of PIPA to the OIPC, acts

in a way to avoid or prevent a contravention of PIPA, or refuses to do anything he or she believes contravenes PIPA. If any of these situations arise, the employee, or “whistleblower,” is protected from any punitive action taken by an organization against him or her, such as suspension or dismissal.

Office of the Information and Privacy Commissioner for British Columbia (OIPC)

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