

UJA TAS Privacy Notice

Last Updated: November 28, 2022

UJA is a not-for-profit organization that does not engage in commercial activities and is not subject to the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). Nonetheless, UJA is committed to respecting the privacy rights of individuals and our practices are consistent with privacy legislation and best practices. We take the necessary precautions to protect your information from unauthorized access, disclosure or alteration. This Privacy Notice is designed to explain the types of Personal Information we collect, how it is used, and the steps we take to ensure your Personal Information is handled appropriately.

This Privacy Notice applies to all Personal Information held by the UJA Community Scholarships program including the online Tuition Assistance System (TAS), which includes Personal Information of applicants and their families collected through the Portal or when you interact with TAS (e.g., by phone or by email). All UJA TAS staff, institutional affiliates, contractors/service providers, end users or representatives of Community Partners families must comply with this Portal's privacy practices.

The Portal is monitored by UJA for the purpose of onboarding partners, ensuring best practices, and allowing organizations to leverage it to be able to run other programs, for example, summer camps. The data collected via this Portal is not connected to the main UJA database. If you wish to learn more about UJA's broader privacy practices, visit www.jewishtoronto.com/privacy-policy.

By using the Portal or otherwise providing us with Personal Information, you accept and agree to the Portal's privacy practices described in this Privacy Notice, as they may be amended from time to time. If you do not agree to our privacy practices, do not use the Portal or otherwise provide UJA TAS with Personal Information.

This Portal is not meant to be used by minors (under 18 years of age in the Province of Ontario). If you are a minor, do not use the Portal. If you enter information of another individual in this Portal, you represent and warrant that you have the legal authority to do so (e.g., if you are the parent or legal guardian entering information for a child) or that you have obtained the proper consent from the individual (e.g., if you are entering information for your spouse).

DEFINITION OF PERSONAL INFORMATION

Personal Information is any information about an identifiable individual. Some examples are name, phone number, and address. Personal information may be sensitive in nature, such as race, religion, medical history, and financial information.

COLLECTION AND USE OF PERSONAL INFORMATION

UJA TAS collects and uses your Personal Information including your dependents name and birthdates, marital status, mailing address, email address and relevant financial information (such as income, assets and expenditures) for the purposes of administering the Community Scholarships program and managing the scholarship application and selection processes.

Below are some of ways we collect and use Personal Information to achieve the identified purposes.

- maintaining Portal user accounts;

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- reviewing and assessing applications, including calculating eligibility for tuition assistance;
- communicating with families about their application
- quality assurance (e.g., monitoring, auditing, and reporting activities);
- recommending potentially relevant UJA programs;
- research on trends relating to scholarship community to facilitate future program planning (e.g., impact of rising interest rate on family monthly budget);
- any other purposes required by law.

We will not use or disclose Personal Information for purposes other than those for which it was collected, except with your consent, or as required by law. Should we publish trends compiled from your personal information, they will be in aggregate form where the individuals cannot be identified.

DISCLOSURE OF PERSONAL INFORMATION

Personal Information collected may be disclosed to the institution(s) of your choice ("Community Partners") during the scholarship selection process. Where Personal Information is disclosed to Community Partners, UJA TAS requires contractual guarantees that they will protect Personal Information with the same adequacy as UJA TAS.

In addition, we may disclose Personal Information if required by law, including to comply with a court order, federal or provincial regulations, or inquiry by a government body. Where Personal Information is disclosed, we will not disclose more information than necessary.

LOCATION OF PERSONAL INFORMATION

We may share Personal Information with service providers whose mandate is to assist UJA in administering the TAS. Service providers may include third-party software platforms hosting the online Portal, its data as well as delivering communication to families.

These service providers may access or store Personal Information in other foreign jurisdictions in order to administer the TAS. Where information is transferred or stored outside Canada, it may be accessible to foreign law enforcement and other foreign authorities.

PROTECTION OF PERSONAL INFORMATION

UJA use, and require Community Partners to use, reasonable administrative, technical and physical measures to ensure Personal Information is protected from theft, loss and unauthorized access, use, or disclosure.

UJA put in policies and procedures to ensure that its staff, volunteers, contractors/ service providers protect Personal Information to the level satisfactory to UJA standards. Staff, volunteers, contractors / service providers take mandatory training to comply with our privacy policies.

RETENTION OF PERSONAL INFORMATION

Your Personal Information will be kept for as long as necessary to fulfil the purposes described in this Privacy Notice. The length of time we retain your information may vary, depending on the purpose for which it was collected and the nature of the information. Duration may extend to allow us to comply with applicable laws. When your Personal Information is no longer required, we follow internal procedures to securely destroy it.

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YOUR RIGHTS

UJA TAS makes best efforts to ensure that your Personal Information is accurate, complete, and up to date. You have the right to request access and/or correction to your Personal Information held by UJA TAS. You may do so by writing to our Privacy Officer at privacy.officer@ujafed.org. We will make best effort to respond to your request. Subject to applicable legal restrictions, we may refuse your request but we will provide you with reasons.

You have the right to withdraw your consent to our collection, use, or disclosure of your Personal Information. However, it should be noted that if you withdraw your consent in whole or in part, we may no longer be able to provide you with TAS services or other UJA programs that you may be eligible for.

HOW TO CONTACT US

If you have any questions or concerns about the UJA TAS privacy practices or your privacy rights, or if you wish to make a complaint, please contact our Privacy Officer at privacy.officer@ujafed.org.

CHANGES TO OUR PRIVACY PRACTICES

This Privacy Notice may be revised from time to time to reflect changes to our privacy practices. We encourage you to periodically revisit this page to ensure that you are familiar with those changes. We indicate at the top of this Privacy Notice the most recently version.