



Universities Canada Programs

Privacy Notice

Who are we?

Universities Canada is a membership organization providing universities with a unified voice for higher education, research, and innovation.

A major part of our work includes supporting students by offering scholarships through our scholarship administration service, **Scholarship Partners Canada (SPC)** and other international mobility programs on behalf of government, not-for-profit and private sector organizations.

To be able to successfully run our programs, we often need to collect Personal Information. We take this responsibility very seriously. This Privacy Notice (“Notice”) outlines how we collect, use, share and protect the information used in our services.

What is Personal Information?

Personal Information is information that on its own or combined with other data, can be used to identify you as a person. Personal information includes information collected from you directly, such as information you provided in your application form. Personal Information can also come from a third party supporting your application, such as a teacher/professor providing a letter of support.

Who does this Notice apply to?

This Notice applies to all scholarship programs administered by Scholarship Partners Canada. The Notice also applies to the partnership programs administered by Universities Canada, including:

- Bell Let's Talk Post-Secondary Fund
- Canadian International Development Scholarships 2030 (BCDI 2030)
- Flight 302 Legacy Award
- Global Excellence Initiative
- Global Skills Opportunity
- IDRC International Doctoral Research Awards
- Queen Elizabeth II Diamond Jubilee Scholarships Program
- The Weston Family Awards in Northern Research
- Tanaka Fund
- Veterans Bursary Program



This Notice does not apply to Universities Canada's other operations. You can access Universities Canada's Privacy Notice on its website at <https://www.univcan.ca/privacy-policy/>.

What Personal Information do we collect and how?

The Personal Information collected depends on the program you are applying to or working with. We make every effort to limit the amount of Personal Information we collect, and only ask for the details needed to evaluate your application, communicate with you, report on progress, and process payments. We process your Personal Information for the purposes set out in this Notice.

We may collect your Personal Information as follows:

(a) Directly from you:

- When registering an account to browse and access our programs, we may collect information from you such as your name and email address.
- When applying for a scholarship/program, we require Personal Information from you, which may include sensitive Personal Information. Information collected in your application form may include your name, contact information, age and other demographics, your likeness (i.e. photographs or videos), educational background, financial need, volunteer activities, work experience and personal history or opinions related to the objectives of the scholarship program.
- Occasionally, demographic information may be requested in optional, survey format, to help measure the success of a program and to ensure the program is meeting its equity, diversity and inclusion objectives.
- For certain international programs, we may collect your travel visa application information, so that we may be of assistance in facilitating the immigration process.
- When disbursing payments we require your banking details, certain tax information and where a direct payment is made to an individual, a Social Insurance Number and direct deposit information are required.
- If a program includes payment to your college or university, only your student number is required.

(b) From a third party

Information about you may be provided to Universities Canada by someone supporting your application, such as a teacher, community reference, or program administrator. This information is typically limited to name, contact information, and in some cases provided through letters of support.

(c) Automatically from your interactions with our website

When you visit our website we may send your browser one or more cookies, which are small files containing a string of characters that is sent to your web browser and uniquely identifies your browser. Cookies help us collect information so that we can better understand how users access and navigate our website. We use necessary and session cookies to make our site function. These cookies enable core functionality such as security, session management, and accessibility. They do not collect personally identifiable information.



Please indicate your preference on the cookie banner upon landing on our website. Alternatively, you can reset your browser to reject cookies. You can manage cookies via your browser under Settings. If you choose to decline cookies on your browser, you will reject cookies from all websites, not just ours. You may also lose some functionalities on websites if your browser blocks all cookies.

How do we use your Personal Information?

We process your Personal Information for the following purposes:

- **To register an account.** To access our programs, we require that you create an account by providing your name and email address. Having an account allows you to browse opportunities and when ready, apply to our programs.
- **Apply for a scholarship/program.** Once you have determined which program(s) you will apply to, you will be asked to read the program guidelines and complete the application form. The forms are designed to only collect the information needed to process your application and disburse scholarship payments (more below) if your application is successful.
- **To Communicate with you.** We communicate with you through updates on your online portal as well as by email and in some cases by telephone. We initiate these communications to help ensure you don't miss application deadline(s), to keep you informed of the progress of your application, and to ensure your application is complete. On occasion, and with your consent, we and/or the sponsor of the program may communicate with you to measure whether the program is meeting its goals. If you reach out to us, we may also collect your Personal Information in order to respond to your query. You can opt out of these communications at any time as indicated below under What are your rights and choices.
- **To disburse payments.** Should your application be successful, we use your financial and other necessary information to process your payment and issue necessary tax forms.
- **To provide assistance with travel visa issues.** Should emergency assistance with immigration be needed, your travel visa information will be used to communicate with the appropriate embassy/high commission.
- **For Reporting.** Information collected in your application may also be used to track the long-term impact of the program and/or to evaluate its effectiveness. Information used in reports is always anonymized and therefore is not considered Personal Information.
- To (i) comply with legal obligations; (ii) respond to requests from competent authorities; (iii) protect your interests; (iv) protect your rights, safety, or property, and/or that of our partners or others; and (v) enforce or defend our legal rights.

We process your Personal Information for the following **legal bases**:



- **Contract** - we will use your Personal Information to register your account, fulfill payment obligations, and provide you with support in the program.
- **Consent** - we rely on your consent to use your images, participate in surveys, and occasionally communicate with you based on your preferences.
- **Legitimate Interest** - we use your Personal Information to confirm your identity, detect and prevent fraud and verify tax information.
- **Legal Obligations** - we use your Personal Information to comply with our legal obligations, including responding to lawful requests, court orders, and legal processes.

We may aggregate and de-identify your Personal Information so that the data will in no way identify you or any other individual. We may use this aggregated and de-identified data to:

- Assist us to better understand how users are accessing and benefiting from our programs;
- Provide existing and potential students with further information regarding the uses and benefits of our programs; and
- Otherwise, improve our services.

Who do we share your Personal Information with?

We do not sell your Personal Information to a third party. We also do not share your information with others for their direct marketing use.

We share your Personal Information with your consent or for a legitimate interest, such as completing a transaction or administering the program. We limit who we share your Personal Information with and what we share with them to only what is necessary. We do not allow third-party service providers to use your Personal Information for their own purposes.

We share your Personal Information with the following parties:

- **Members of the scholarship selection committee.** With your consent, we share your information so that your application can be evaluated and assessed.
- **Your parent/guardian.** With your consent, your information may be shared with your parent/guardian.
- **Program Sponsor.** With your consent, we share your application information so that project sponsors can jointly administer the program, measure whether the program is meeting its goals and in some cases communicate with you.
- **Program Administrator.** For programs managed by a university, the program administrator(s) from your university may also have access to your information.
- **Embassy/High Commission personnel.** For select international programs, with your consent and only as needed, your information may be shared with embassy/high commission personnel.
- **Service Providers.** To help us perform functions related to our programs. For example, we may use service providers to provide us with administrative, financial, or quality assurance services. These parties are bound by confidentiality and are limited in the way



in which they can process, access, or store Personal Information based on our instructions.

- **Legal Requirement.** We may also disclose Personal Information (to the extent that we have it) if we are required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of individuals, or (v) protect against legal liability.

We may also share aggregated / de-identified / anonymized data for analytics with our sponsors to track the long-term impact of the program and/or to evaluate its effectiveness.

Where is your Personal Information processed?

All information collected by Universities Canada is processed on a dedicated Canadian server, located in Toronto, Ontario Canada.

If you reside outside of Ontario, your information is therefore stored, shared, or processed outside of your jurisdiction which may include outside of Quebec and the European Economic Area (EEA). By accessing and participating in our programs, you acknowledge that your information will be transferred to and stored in Ontario, Canada.

While we take appropriate safeguards to protect your personal data, when your data is stored or processed in a different jurisdiction, it is subject to the laws of the foreign jurisdiction including foreign governments, courts, law enforcement and regulatory agencies. These jurisdictions may not have the same information protection laws as the country in which your personal data was collected.

When transferring personal data outside of the EEA, we enter into contractual arrangements (such as Standard Contractual Clauses) with service providers that offer you a similar degree of protection you would get in the jurisdiction your personal data was collected. By accessing and participating in our programs, you consent to your Personal Information being stored and processed in a country or province outside of where you reside.

How is the information you collect protected?

We protect your Personal Information with technical, organizational, and physical safeguards appropriate to the sensitivity of your Personal Information. These safeguards include, but are not limited to:

- ensuring staff receive mandatory Privacy training and sign confidentiality agreements;
- limiting access to information through the use of role-based permissions in our system;
- undertaking Privacy Impact Assessments during the program design phase, to evaluate Privacy risks, data needs, and designing the program to incorporate the protection of Personal Information wherever possible; and
- regular review of our own safeguards and those of our service providers.



It is important to understand that no online platform is perfectly secure. We encourage you to also play a role in protecting your Personal Information by not sharing your account information/password and by using only the platform to share information with us, rather than sending documentation by email, mail, or other means.

How long do we keep your Personal Information?

We retain your Personal Information based on the status of your application and on our legal and contractual obligations.

- Personal Information on unsubmitted applications will be deleted from the system after two years of inactivity.
- Personal Information on unsuccessful applications will have personal identifiers anonymized after two years of inactivity.
- Personal Information on successful applications will be anonymized after seven years of inactivity.

Universities Canada will retain a permanent repository of anonymized data for statistical purposes.

Personal Information of Minors

Unless otherwise stated, most of our programs are intended for individuals over the age of 16. They are not intended for or targeted at children under that age and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at privacy@univcan.ca so that we can delete the information promptly.

What are your rights and choices?

Your Choices:

Where we process your Personal Information based on consent, you may withdraw your consent at any time by contacting privacy@univcan.ca. Please note that withdrawing your consent may make you ineligible for the program and/or scholarship payments.

To manage your cookies on your browser, please see this Notice above under **What Personal Information we Collect (c) Automatically from your interactions with our website** for instructions on how to make choices.

Your Rights:

Depending on where you reside, applicable privacy laws may give you certain rights relating to your Personal Information and our processing of it.



- **Your right of access and rectification.** You have the right to access and correct the Personal Information we have on file for you. To the extent we can fulfill your request to rectify your information, we may need to verify the accuracy of the new information you provide to us.
- **Your right of deletion.** You have the right to request deletion of the Personal Information we have on file for you. Please note that deleting your information will make you ineligible for the program and/or scholarship payments. In some instances, such as legal reasons, we will not be able to fulfill your deletion request. If we cannot fulfill your request, we will notify you of the reason.
- **Your right to data portability.** You have the right to ask us to transfer your Personal Information to another organization in a structured, commonly used, and machine-readable format.
- **Your right not to be subject to automated decision-making.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.
- **Your right to restriction/objection of processing.** You have the right to ask us to restrict the processing of your Personal Information in certain circumstances, such as if the processing of your Personal Information is unlawful, if you contest its accuracy, or if we no longer need your personal data for processing however it has been retained as permitted by law.

To exercise your rights, please contact us at privacy@univcan.ca. We will respond to any request within 30 days. If we need more time to fulfill your request, we will let you know.

You may be required to prove your identity so that we can authenticate that the person making the request is you. If you designated an authorized agent to submit a request to exercise your rights, we will require verification that you provided the authorized agent permission to request on your behalf.

Please note that your rights are not absolute as there may be exceptions that exist in the applicable law. If there are legal reasons why we cannot fulfill your request, we will inform you in our response, including the reason why we cannot fulfill the request.

While we make efforts to always maintain the accuracy of your Personal Information, we rely on you to provide us with up-to-date contact information and other information related to your participation in the program.

Reporting a Privacy Complaint

You have a right to lodge a complaint about our processing with a supervisory authority or regulator in the jurisdiction where you believe your rights have been violated. If you are concerned about our Personal Information practices, we would appreciate hearing about it first to try to resolve your concerns. You can contact us through the methods listed above.

If Universities Canada has not responded satisfactorily to your complaint or inquiry and you want to notify the Privacy Commissioner of Canada, you may do so at:



Office of the Privacy Commissioner of Canada

30 Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376
Phone: (819) 994-5444
TTY: 819-994-6591

Other Links

Our website may contain links to other third-party sites. When you click on one of those links, you are visiting a website operated by someone other than us, and the operator of that website has a different privacy policy. We are not responsible for the privacy practices of those sites. We encourage you to read the privacy policies of these third-party operators.

Contact Us

Universities Canada has appointed a Privacy Officer who is accountable for the organization's privacy program and for compliance with this Notice. For any questions or concerns, please contact:

Privacy Officer:

Heather Cayouette, CIPP/C, CIPT
privacy@univcan.ca
350 Albert St., suite 1710
Ottawa, ON K1R 1B1

Phone: (613) 563-1236