Canadian Society of Internal Medicine
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# **CSIM Privacy/Confidentiality Policy**

#### **GENERAL**

The CSIM respects your right to privacy and does not sell or rent its membership list. From time to time, members, associates, and participants in CSIM activities may receive information/updates on educational/research activities or information from commercial organizations for initiatives seen as a potential benefit to CSIM members. If any such communications are circulated, they are vetted by the CSIM and sent directly from the CSIM.

# 1. Identifying Purposes: Why We Collect Information

The CSIM may collect, use and disclose your personal information in order to provide you with:

- Membership services.
- Continuing professional development services.
- Information and updates regarding CSIM educational activities and initiatives.
- Information and updates on activities and initiatives that may be of interest to those in the field of internal medicine/general internal medicine.
- Circulation of the CSIM's official journal, the Canadian Journal of General Internal Medicine (CJGIM).
- Updates on CSIM activities and initiatives.
- Opportunities to volunteer within the CSIM.

### **Membership Information**

The CSIM collects and may use personal information from individuals who are applying to become members/associates for the following purposes:

- To process a member/associate application and/or renewal.
- To collect and process member/associate dues and to issue receipts.
- To communicate with and keep members/associates informed about CSIM activities/initiatives by sending newsletters, e-blasts, meeting information, and the CJGIM.
- To analyse demographics for future planning.
- To contact members/associates to inform them of opportunities to participate in CSIM activities, initiatives, or volunteer opportunities.

## Registration to the CSIM Annual Meeting and Other CSIM Initiatives

The CSIM collects and may use personal information from individuals who are <u>not</u> CSIM members/associates and who are registering for the CSIM Annual Meeting and/or other CSIM activities for purposes such as:

- Processing registrations, applying payments and sending receipts.
- Sending list of registrants' (name/city/province) to exhibitors/sponsors, if permission to release was granted.
- Inviting registrants to future CSIM events.
- Disseminating Calls for Abstracts, Grants and Awards.
- Circulating the benefits of CSIM membership, if permission to forward information was granted.

#### 2. Consent

The CSIM will not otherwise disclose any personal information without your consent except under the following circumstances:

- In response to subpoenas, court orders, or legal process, or to establish or exercise our rights to defend against legal claims.
- If we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law.
- If the CSIM is acquired by or amalgamated with another organization.
- As otherwise permitted or required by applicable law.

### **Communications from CSIM**

You may unsubscribe from e-mails from CSIM by clicking on the "unsubscribe" link at the bottom of emails from CSIM or by emailing your request to <a href="mailto:info@csim.ca">info@csim.ca</a>. However, if you withdraw consent you would not be provided with full membership and/or other information relating to the benefits of CSIM membership and/or CSIM activities/initiatives.

Membership dues notices/invoices may <u>not</u> be opted-out of. Withdrawal of membership is to be sent in writing to <u>info@csim.ca</u>.

Registrants of a CSIM Annual Meeting may <u>not</u> opt out of invoices nor information required to participate in the CSIM Annual Meeting. Cancellation of an annual meeting registration is to be sent in writing to <u>info@csim.ca</u>.

Invoices relating to services rendered by the CSIM may <u>not</u> be opted out of. Such services include, but are not limited to, MOC accreditation, abstract publishing, purchase of exhibit space and sponsorships.

Please allow two (2) weeks to process requests to withdraw consent. For additional information, to review and/or update your own personal information, please contact the CSIM at 421 Gilmour Street, Suite 200, Ottawa, Ontario K2P 0R5, 613-422-5977 or at <a href="mailto:info@csim.ca">info@csim.ca</a>.

#### 3. Limiting Collection

We collect information by fair and lawful means and collect only that information which may be necessary for purposes related to responding to your inquiries and sending you e-mails. We identify to whom, and for what purposes, we disclose your personal information, at the time of or prior to collecting such information from you and obtain your consent to such disclosure.

#### 4. Limiting Use, Disclosure, and Retention

CSIM will store personal information using hard copy and/or electronic means in such a way as to prevent unauthorized collection, access, use, disclosure or disposal of the personal information. Personal information is not used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information is retained only as long as necessary for the fulfillment of those purposes and/or as required by an applicable regulatory body.

If using personal information for a new purpose, CSIM documents this purpose.

CSIM information that is no longer required to fulfill the identified purposes is destroyed, erased, or made anonymous.

#### 5. Accuracy of Personal Information

CSIM will make every reasonable effort to ensure that personal information collected and used is accurate. Individuals providing personal information will have the opportunity to review and correct their personal information.

If CSIM discloses personal information about an individual, CSIM will take reasonable steps to ensure that the information is accurate, complete and up-to-date for the purposes that are known to CSIM at the time of the disclosure. Otherwise, CSIM will clearly set out any limitations or qualifications relating to the accuracy of the disclosure.

# 6. Safeguards

Security safeguards appropriate to the sensitivity of the information protect personal information. Security safeguards protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification or destruction. CSIM protects personal information regardless of the format in which it is held. Extreme care is taken when disposing or destroying personal information in order to prevent unauthorized parties from gaining access to the information.

The methods of protection include:

- Sensitive information, such as credit card data, is encrypted and transmitted to us in a secure way.
- Physical measures, for example, locked filing cabinets and restricted access to offices.
- Destruction of sensitive information: all personal information on paper that is not required to be kept for business/legal purposes is shredded.

CSIM makes its staff and agents aware of the importance of maintaining the confidentiality of personal information.

### **Data Security**

The CSIM website has measures in place to ensure the security of information. Our service providers use advanced encryption and firewall technology. Servers reside in North America. We make reasonable effort to protect your personal information from loss, misuse or alteration by third parties; however, all users should be aware that there is always some risk involved in transmitting information over the internet and that e-mail is not a secure form of communication.

*Wild Apricot* (www.wildapricot.org) serves as both the membership and conference registration software. Their data security information may be viewed by clicking here.

#### 7. Access to Personal Information

CSIM promotes individuals' right of access to his/her personal information and will provide this information in an understandable format. CSIM will provide access to information upon request within 30 days as required under federal law, although the Privacy Officer may request an extension of another 30 days.

Upon request, an individual is informed of the existence, use, and disclosure of his or her personal information and is given access to that information. CSIM may ask the individual to supply enough information in order to

confirm the existence, use and disclosure of the personal information. CSIM will inform the individual how the information is or has been used and will provide a list of any organization to which it has been disclosed (if any). An individual is able to challenge the accuracy and completeness of the information and have it corrected or amended as appropriate.

When a challenge is not resolved to the satisfaction of the individual, CSIM records the nature of the unresolved challenge. When appropriate, the existence of the unresolved challenge is transmitted to third parties having access to the information in questions (if any).

**Note:** In certain situations, CSIM may not be able to provide access to all the personal information they hold about an individual. Exceptions to the access requirement are limited and specific. The reasons for denying access are provided to the individual upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

### 8. Challenging Compliance

This document sets-out procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The CSIM Privacy Officer tracks and investigates all complaints made about CSIMs personal information management and will take appropriate action to correct any inaccurate personal information or modify policies and procedures if needed.

In most cases, an issue is resolved simply by telling us about it and discussing it. If this doesn't resolve it, you may contact the CSIM Privacy Officer at: <a href="mailto:info@csim.ca">info@csim.ca</a> attention: Privacy Officer. If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner in your province.

### **CSIM Website Disclaimer**

The intent of the Canadian Society of Internal Medicine (CSIM) website is to provide valid and useful resources and information; however, errors and omissions may occur. As such, the CSIM disclaims any and all warranties, express or implied, relating to its website, information contained within it or within external sites to which links are provided, including warranties as to the completeness or accuracy of the information. Further, the CSIM (nor any of its directors, volunteers, staff, contractors) shall not be liable for any direct, indirect, special, incidental, or consequential damages under any theory of liability, arising out of, in connection with, or resulting from any user's access to this website or any information contained within it or within sites to which links have been provided.

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# **CSIM Copyright Statements**

# WEBSITE

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# **EDUCATIONAL EVENTS**

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at May 25, 2018