

# BabyFriendlyHalton PRIVACY POLICY

(Last updated: November 21, 2023)

Halton Baby-Friendly Initiative (referred to as HBFI in this Privacy Policy) respects your privacy and is committed to protecting your personal information. This privacy policy will inform you as to how we look after your personal information when you visit our website at [babyfriendlyhalton.ca](http://babyfriendlyhalton.ca), regardless of where you visit it from, and tell you about your privacy rights and how the law protects you.

By submitting personal information to HBFI or its service providers and agents (collectively referred to as HBFI, “we”, “us” or “our” in this Privacy Policy), you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting us. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

## 1. WHO WE ARE AND WHAT WE DO

HBFI is a non-profit organization who promote, protect and support breastfeeding and supports compliance with the World Health Organization’s Code of Marketing Breastmilk Substitutes. HBFI offers breastfeeding education courses and access to resources that support informed decision making related to infant feeding. We also maintain an up-to-date list of available breastfeeding supports in the Halton area.

HBFI collects and processes personal information through the following areas of operations:

- Registration for courses: At student’s request, we collect and process the student’s personal and financial information submitted through our website and that of third parties in order to register for HBFI education courses.
- Signing up for mailing list: At user’s request, we collect and process the user’s personal information through our third party tool in order to maintain a mailing list. At any time, if the user no longer wants to be on the mailing list, they can contact us.
- Contacting us through our website contact form: At user’s request, we collect and process the user’s personal email information through our third party email service.

## 2. WHAT PERSONAL INFORMATION DO WE

## COLLECT ABOUT YOU?

*Personal information* means any information about an individual from which that person can be identified. It does not include personal information where all references to the identity of the relevant individual have been removed (anonymous personal information).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Personal information** includes:
  - first name and last name,
- **Contact Personal information** includes:
  - address, email address and telephone number.
- **Financial Personal information** (only when registering for a course) includes:
  - credit card number, expiry date and CVV

We also collect, use and share Aggregated Personal information such as statistical or demographic information for any purpose. Aggregated Personal information could be derived from your personal information but is not considered personal information in law as this information will not directly or indirectly reveal your identity.

We do not collect any Special Categories of Personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

If you provide HBFi with personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

## 3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect personal information from and about you including through:

- a. **Direct interactions.** You may give us your Identity, Contact, Transaction and Financial Personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - i. Register for our educational services or publications or to contact us or

- provide feedback;
- ii. Request marketing to be sent to you; or
  - iii. Give us feedback or contact us.
- b. **Third parties or publicly available sources.** We will receive personal information about you from various third parties as set out below:
- i. Technical Personal information from:
    - A. analytics providers such as Google Analytics;
    - B. digital marketing service platforms such as MailChimp, Sprout Social and Hootsuite;
    - C. advertising networks such as Google Adwords, DoubleClick, Facebook, Instagram and X.

## 4. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where you consent to such collection and use, such as by consenting to this Privacy Policy.
- Where needed to perform the service you are requesting.
- Where we need to comply with a legal obligation.

Note that we may process your Personal information for more than one lawful basis depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on to process your Personal information where more than one ground has been set out in the table below.

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

**Table: Purposes for which we will use your personal information**

Purpose/Activity	Type of personal information	Lawful basis for processing including basis of legitimate interest	Who do we share your personal information with for these purposes

To process your requests and perform our services	(a) Identity (b) Contact (c) Financial	Performance of a contract with you (e.g. registering for a course).	We may share your personal information with certain of our service providers who process your information on our behalf, on a need to know basis, in order to be able to process your requests or otherwise perform our services.
To contact us through our contact form or email	(a) Identity (b) Contact	(a) Performance of a contract with you.	(a) We do not share your personal information for this purpose unless you provide your Financial personal information, in which case we only share this information with our third party payment processor.
To contact us or provide us feedback; to sign up to our mailing list; to participate in a survey;	(a) Identity (b) Contact	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for marketing purposes).	(a) We do not share your personal information for this purpose.

### Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal information for an unrelated purpose, we will notify you and

we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

We may share your personal information with the parties set out above for the purposes set out in the table *Purposes for which we will use your personal information* in this Privacy Policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

By providing us with Personal information, you acknowledge and agree that your Personal information may be processed in other countries, including the United States, where laws regarding processing of Personal information may be less stringent than the laws in your country. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the Personal information. This will include putting appropriate contractual safeguards in place to ensure an adequate level of protection for the Personal information. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal information out of Canada.

## **7. HOW DO WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION?**

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures that are intended to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and

- unlawful destruction or accidental loss.

All of our members and personal information processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?**

We will only retain your Personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your personal information: see your legal rights Section below for further information.

In some circumstances we will anonymise your Personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

The vast majority website users are Canadians and so our privacy policy has been drafted to help ensure compliance with applicable Canadian law. Subject to certain exemptions, you have the following rights in relation to the Personal information we hold about you:

- a. Your right of access  
If you ask us, we'll confirm whether we're processing your Personal information and, subject to any applicable exemptions, provide you with a copy of that Personal information within the timescales provided for by law. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.
- b. Your right to rectification

- If the Personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your Personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- c. **Your right to erasure**  
You can ask us to delete or remove your Personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your Personal information). If you are entitled to erasure and if we've shared your Personal information with others, we'll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- d. **Your right to restrict processing**  
You can ask us to "block" or suppress the processing of your Personal information in certain circumstances such as where you contest the accuracy of that Personal information or you object to us. If you are entitled to restriction and if we've shared your Personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your Personal information with so that you can contact them directly.
- e. **Your right to personal information portability**  
You have the right, in certain circumstances, to obtain Personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- f. **Your right to object**  
You can ask us to stop processing your Personal information, and we will do so, if we are:
- relying on our own or someone else's legitimate interests to process your Personal information, except if we can demonstrate compelling legal grounds for the processing; or
  - processing your Personal information for direct marketing.
- g. **Your rights in relation to automated decision-making and profiling**  
You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.
- h. **Your right to withdraw consent**  
If we rely on your consent (or explicit consent) as our legal basis for processing your Personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you

- withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- i. Your right to lodge a complaint with the supervisory authority  
If you have a concern about any aspect of HBFI's privacy practices, including the way we've handled your Personal information, you can report it to the relevant supervisory authority.

## 10. CONTACTING US

If you have any questions about this Privacy Policy or our privacy practices, please contact us

[info@babyfriendlyhalton.ca](mailto:info@babyfriendlyhalton.ca)

You have the right to make a complaint at any time to the relevant supervisory authority for personal information protection issues. In Canada, you can contact the Office of the Privacy Commissioner of Canada ("OPC"), see: <https://www.priv.gc.ca/en/contact-the-opc/>.

We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

### Links to Other Websites

This website includes many links to third-party websites. Clicking on those links may allow third parties to collect or share personal information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

### Changes

HBFI reserves the right to modify or supplement this Privacy Policy at any time. If any changes are made to this Privacy Policy, a copy of the Privacy Policy as amended will be posted on our Website as soon as practicable following that update. Your continued use of the Website following such posting will signify your consent to its revised terms.