

Transforming Learning, Revolutionizing Healthcare

CFD Privacy Policy

1. Introduction

The Centre for Faculty Development (CFD) was founded in 2002 as a partnership between St. Michael's Hospital (now known as Unity Health Toronto) and the University of Toronto (UofT), Temerty Faculty of Medicine. The Centre is positioned as an Extra Departmental Unit (EDU) within UofT and is known for the strength and relevance of its programming and its internationally recognized scholarship. We provide flexible and adaptable programming that is responsive to emerging needs, facilitates communities and networking, and supports capacity building across the system.

This Privacy Policy discloses the privacy practices for <https://centreforfacdev.ca/>, the website for the Center for Faculty Development. By using this website, you are consenting to our collection and use of information in accordance with this Privacy Policy.

2. Changes to Our Privacy Policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on September 16, 2022.

By using, and continuing to use, this website you consent to this Privacy Policy.

3. Data Collection

We, and our third-party vendors, collect certain information regarding your use of <https://centreforfacdev.ca/>. The pages you visit on <https://centreforfacdev.ca/>, will be tracked, but you will remain anonymous. We connect data from different systems but do not link IP addresses to any Personal Data. We may also collect other information as described in this policy.

We collect several categories of Personal Data, which is information that identifies you, namely:

- demographic data you provide (i.e. name, email address, address)
- sensitive personal data that you may choose to provide (i.e. ethnicity, gender identity)
- data that is required to provide you with participation/completion credits (i.e. academic or hospital affiliation, CV, references, letters of interest)
- other data that you may choose to provide: account or newsletter preferences, event registration, interest in future events, responses to our evaluation surveys, financial and transaction information, such as postal address, telephone number, payment information (if paid directly to Unity Health Toronto)

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- data collected automatically: information about courses you register for or have attended, confirmation of financial payment to a third party (if using Paypal), activity information about your use of our sites (such as the content you view or post, how often you use our services or purchase products, and your preferences)

You provide us with most of the data we collect. We collect data and process data when you:

- Email or call us
- Register online and create an account and profile page
- Place an order for any of our products or services (e.g. registering for a course or waitlist)
- Subscribe to our newsletter
- Voluntarily complete a survey, form or provide feedback on any of our message boards or via email
- Voluntarily participate in research that requests additional data
- Use or view our website, even without an account, via your browser's cookies and analytics tools
- Wish to attend or have attended our events or programs
- From our third-party service providers

We may also collect your Personal Data indirectly from our third-party service providers, and/or transfer your data between these providers, to perform services on our behalf or for your benefit, such as:

- Event registration and coordination (e.g. Arlo Training Management Software for event registration)
- Marketing and promotions (e.g. Mailchimp for CFD newsletter)
- Evaluation or quality improvement (e.g. SurveyMonkey for post session surveys)

We may collect your Personal Data indirectly from third-parties who provide a service to you for your convenience:

- Payment processors (e.g. PayPal for program or event fees payment)

Cookies

Your information may be collected through the use of cookies, which are small data files placed on your device (e.g. computer) that allow us to collect certain information whenever you visit or interact with our website or online services.

Some cookies are managed by us and others are managed by third parties that we do not control. We do not sell, trade or otherwise transfer to outside parties any personally identifiable information. This does not include trusted third parties or subcontractors who assist us in operating our website, conducting our business, or servicing you. Such trusted parties may have access to personally identifiable information on a need-to-know basis and will be contractually obliged to keep your information confidential.

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This information may also be collected through the use of other data collection technologies that embed graphic files in our websites and online services. We use cookies to keep you signed in, authenticating users, determining popularity of content, analyze site traffic and trends to optimize our site users' experience, and generally understanding online behaviours and interests of those who interact with our site and services. These could include what your settings, you are in. A mix of first-party and third-party cookies are used.

You may disable cookies through your individual browser options. However, in a few cases, some of our website features may not function as a result.

Please refer to our [Cookie Policy](#) for more information.

4. Data Usage

We may use the information we gather from you for:

Administrative and Systems Management

- create and manage your account
- administer our systems
- respond to your emails or inquiries
- detect activities that may violate our Terms of Use
- perform necessary operations to maintain our services, including to troubleshoot software bugs and operational problems
- retain and evaluate information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive
- monitor and analyze usage and activity trends
- alumni archive

Event Registration and Payment

- process payments
- event registration and coordination

Communication

- send automated responses to you (e.g. event details)
- communicate with you about courses
- maintain an alumni, participant and faculty registry of your name, role, and CFD event or program enrollment and/or completion, to be communicated on the website or within periodic reports (you can withdraw consent for its public display by contacting cfid@smh.ca)

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Marketing

- marketing and promotions (e.g. sending our newsletter, if subscribed)
- sending information about us and our services if you have agreed to receive our Newsletter (note: you may unsubscribe at any time by emailing cfid@smh.ca)

Evaluation

- contact you for evaluation and questionnaires
- analyze the efficacy, quality, and equity of our educational practices and programming
- analyze how our programs reach and serve diverse groups

Accreditation

- For all accredited programs, we provide the Continuing Professional Development (CPD) office in the Temerty Faculty of Medicine at the University of Toronto with participant names for the purposes of credits and certificates. If you do not wish to have your information shared, please contact cfid@smh.ca.

Non-marketing communications

- If you send us an email, the email address you provide may be used to send you information, respond to inquiries, and/or other requests or questions. We will not share or sell your email address for commercial purposes without your permission.
- We may use Personal Data to generate and provide you with receipts; inform you of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of us or our partners. Non-personally identifiable user or visitor information may be collected and/or shared with third-party vendors to the extent necessary to provide and improve our services. For example, we use third parties such as Google Analytics to identify site usage. We prohibit any third parties who receive user information for this purpose from using or sharing user's Personal Data for any purpose other than providing services for the benefit of our users. We may also provide your information to third parties in circumstances where we believe that doing so is necessary or appropriate to satisfy any applicable law, regulation, legal process or governmental request; detect, prevent or otherwise address fraud, security, or technical issues; or protect our rights and safety and the rights and safety of our users or others.
- We may use Personal Data to investigate or address claims or disputes relating to use of our services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental request, including from law enforcement.

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5. Research

We may collect, use and share your Personal Data as part of a research study in which you have explicitly consented to participate as a research subject. Before any Personal Data are collected for research purposes you will be provided a consent form relating to the specific research project that explains the types of data collected and the purposes for which such data will be processed and shared. In such a case, the description of the collection and use of your Personal Data provided in the consent and/or authorization form will replace the information provided here.

6. Privacy Policies of Other Websites

This website may contain links to other websites. We are not responsible for the privacy practices or the content of such websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

7. Data Security and Retention

Security

Unity Health has reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control. We have implemented technical, administrative, and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use, and modification. We make good faith efforts to store the information collected in relation to the Site and services in a secure operating environment that is not available to the public and is only accessible by authorized employees, agents or contractors. We regularly review our security procedures to consider appropriate new technology and methods. However, no method of transmission over the Internet, method of electronic storage, or security measures are 100% perfect.

Data Retention

We retain your Personal Data for 7 years to carry out carry out the activities to which you have consented and provide services you have requested.

Terms and Conditions

Please also visit our [Terms and Conditions](#) section establishing the use, disclaimers, and limitations of liability governing the use of our website.

Questions?

If you have any questions please contact cfid@smh.ca.

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8. General Data Protection Regulations (“GDPR”)

THIS PROVISION APPLIES TO DATA SUBJECTS LOCATED IN IN THE EUROPEAN UNION (“EU”), EUROPEAN ECONOMIC AREA (“EEA”), AND THE UNITED KINGDOM (“UK”) (TOGETHER “EUROPE”). This information is provided only for the CFD websites and does not apply to external or unaffiliated websites that may be linked on our webpages or materials.

Data Controller

The Data Controller of your Personal Data that was collected and/or voluntarily disclosed to us is Unity Health Toronto, located at 30 Bond Street, Toronto, Ontario M5B 1W8.

What are your data protection rights?

The General Regulation on the Protection of Personal Data (EU Regulation 2016/679 of the European Parliament and Council of 27 April 2016) (“GDPR”), provides for the protection of individuals with regard to the processing of Personal Data as defined in the regulations.

With regard to your data, you have the following rights under the GDPR, subject to certain restrictions under the GDPR and Member State law:

- **Right of access:** You have the right to ask for a copy of the Personal Data that we have collected and retained from and about you. You have the right receive the Personal Data that we hold about you in a structured, commonly used and machine-readable format. A fee may apply.
- **Right of data portability:** You have the right to ask that we transfer the data that we hold about you to another organization, or directly to you.
- **Right of rectification:** You have the right to ask that we correct any information that we hold about you that you believe to be inaccurate.
- **Right of erasure:** (to be “forgotten”): You have the right to ask that your personal data be deleted.
- **Right to Limit Processing:** You have the right to ask that we not process, or change the way we process, your personal data.
- **Right to Object:** If there are reasons that arise from your particular situation, you have the right to object to specific decisions or measures to process your Personal Data.
- **Right to Lodge a Complaint with Supervisory Authority:** You have the right to lodge a complaint with a supervisory authority if you believe that our data processing practices violate the GDPR.
- **Right to Withdraw Consent:** Where your explicit consent has been sought and obtained, you can withdraw your consent at any time. This does not affect the legality of the processing carried out on the basis of the consent up to the point that you withdraw your consent.

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If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, you can contact us at:

Chief Privacy Officer
St. Michael's Hospital
30 Bond Street
Toronto, ON, Canada
M5B 1W8
Telephone: +1(416) 864-6088
Email: privacy@unityhealth.to

You may also choose to contact one of our GDPR representatives:

EU Representative:

Adam Brogden
Email: contact@gdprlocal.com
Telephone: +35315549700
INSTANT EU GDPR REPRESENTATIVE LTD
Office 2, 12A Lower Main Street, Lucan Co. Dublin
Ireland
K78 X5P8

UK Representative:

Adam Brogden
Email: contact@gdprlocal.com
Telephone: +44 1772 217800
1st Floor Front Suite
27-29 North Street, Brighton
England
BN1 1EB

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Identifying Purpose

In addition to the information provided in the sections above related to the collections and uses of your information, this section provides more information around the legal basis for these activities.

When we collect your Personal Data, we may use or disclose it for the following purposes:

- To provide and manage products and services you have requested, or to notify you about changes to them. Lawful basis: contract performance, consent, legitimate interest to enable us to perform our obligations owed to you
- To comply with legal or regulatory requirements, or as otherwise permitted by law. We may process your Personal Data to comply with any legal or regulatory requirements, communicate with regulators, defend or prosecute claims as applicable, or conduct regulatory reporting as may be applicable. Lawful basis: legal obligations; legal claims; legitimate interests (to cooperate with law enforcement and regulatory authorities)
- To communicate with you regarding products and services that may interest you, and to send you updates and offers (if you have chosen to receive these), such as our Newsletter. We may also use your Personal Data for marketing our products and services to you by post, email, phone, SMS, online or through social media adverts. This is an opt-in offer and we will provide you the ability to unsubscribe from any of our marketing. Lawful bases: legitimate interests (to provide you with opportunities that may be of interest), consent.
- To understand our clients and users, and to develop and tailor our products and services. Navigation data, including IP address and other data relating to the operation and use of our website/services are collected for the purpose of obtaining anonymous statistical information on the use of the website and its correct functioning. Lawful basis: legitimate interests (to ensure the quality and legality of our services, to allow us to improve our services and to enable us to offer content and services via a wider range of channels)
- To respond to any questions, you may have we may be required to process your Personal Data to conduct, and keep a record of, our correspondence with you. Lawful basis: legitimate interests (to respond to queries and deliver our products and services)
- To analyze equity and diversity information, and to maintain a list of alumni and participants for our records and to provide information to third parties so you may transfer credits, obtain accreditation, and/or receive a certificate. Legal basis: processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

If the processing is based on your consent, you may at any time withdraw your consent by contacting us using the contact information.

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In order to enter into a contract regarding the purchase of our services and/or products, you must provide us with the required Personal Data. If you do not to provide us with all the required information, we will not be possible to deliver the service and/or product.

If you have any questions or concerns about our privacy practices, the privacy of your Personal Data or you want to change your privacy preferences, please let us know.

Processing

The data processed for the purposes described above will be communicated with, or accessible to, employees and appointees at Unity Health Toronto. Unity Health Toronto may disclose Personal Data to the administration office of its affiliated university, the University of Toronto, and to our subprocessor contractors.

International Transfer of Study Data

We are located outside of Europe and engage with our affiliates and third-party partners, including service providers that may be located in other parts of the world to help us provide our services and products. When we transfer Personal Data from the Europe we will ensure such transfers are in compliance with relevant data protection laws, including, if applicable, European Commission Standard Contractual Clauses, or a positive adequacy decision under Article 45 of the GDPR. In other words, your rights and protections remain with your data and we used approved contractual clauses and other measures designed to ensure that the recipients of your Personal Data protect it.

The UK and Switzerland have approved similar adequacy decisions and SCCs.

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