

Privacy and Confidentiality Policy

WBE Canada (“WBEC”) recognizes the importance of privacy and the sensitivity of both personal information and confidential business information (collectively, “Information”). This Privacy and Confidentiality Policy outlines how we manage and safeguard the Information that we collect from Canadian women’s business enterprises (“WBE”), how such Information will be used by us, and the circumstances in which it will be disclosed.

Personal information

Personal information is any information that identifies you, or by which your identity could be deduced. It includes information such as your e-mail address, age, and ethnic origin. It does not include your name, business address, business title, professional designation(s) or business telephone number; these categories of information may be collected, used and disclosed without reference to this Privacy Policy.

Confidential business information

Confidential business information is information that is not in the public domain that has been developed or acquired by a business for its internal purposes. Confidential business information includes personal information about its owners and employees, client and customer information, marketing information, financial and sales information and projections, organizational information, information about business plans, processes and systems, data, reports, records, models, technology, business methods, know-how and trade secrets.

For the description that follows, we refer to both the personal information and confidential business information of business owners as “Information”.

Collection of Information

We collect Information from you to:

Evaluate your application for eligibility for certification for inclusion in the WBEC database:

Communicate with you, in connection with your application, and thereafter, in connection with your database listing;

Maintain the currency of your database listing;

Share certain information at your discretion with our network of members and other certified WBEs for the purpose of introducing your business to potential business opportunities.

How do we collect your Information?

We collect the Information directly from you, through the application process that you complete and send to us (online and/or in electronic or hard paper formats), and through follow-up phone calls and/or meetings with you.

We may also collect additional information from public sources, such as business directory listings, your business’ Internet web site, company brochures, press reports and other sources, whether or not you provide such sources to us, in your application or otherwise. To the extent that this information is available to the public, it is not protected as “Information” under this Privacy Policy.

We may also require other information from you during the application process including at or following the site visit in order to ensure that your business qualifies with respect to the WBEC criteria.

In connection with our Internet website, we may monitor traffic patterns, site usage and related site information in order to optimize its use and operation. We may provide aggregated data to our service providers and other third parties, but such aggregated data does not include any discrete or identifiable Information.

Consent

On our standard application form, we refer to this Privacy Policy and request your explicit consent for our collection, use and disclosure of your Information.

In some circumstances, your consent may be implied through your conduct, e.g. by providing updated Information to us, to maintain the currency of your database listing.

Disclosure of your Information

Since the role of WBEC is to help our certified WBEs to obtain access to our member corporations that are potential purchasers and partners, we disclose certain Information to those corporate members and other certified WBEs by way of the secure online database, as follows:

When you have consented to the disclosure;

To maintain and co-ordinate communications amongst the WBEs that are certified with WBEC and the corporations that are our members;

When we are required or authorized by law to do so, for example to comply with a court order or subpoena; and

If we engage a third party to provide administrative services to us, (such as computer back-up services or archival file storage; and site assessors) and the third party is bound by this Privacy Policy.

Is the Information Secure?

Like other organizations, we depend on communications and computer information systems that can never be completely free of viruses or guaranteed to be secure from unauthorized access. However WBEC takes all reasonable precautions to ensure that your Information is kept safe from loss and unauthorized access, modification or disclosure. Among the steps taken to protect your Information are:

We secure our office premises;

We restrict access to all Information from applicants and WBEs in our database to staff and consultants whose work relates to reviewing and processing applications and who are also bound by this Privacy Policy;

Our computer systems require the use of passwords; and

We utilize technological safeguards such as security software, encryption and firewalls to prevent hacking or unauthorized computer access.

Retention of the Information

WBEC retains the Information for as long as we determine to be necessary for the purposes described in this Privacy Policy.

Destruction of the Information

We will destroy the Information upon the termination of your relationship with us in the following circumstances:

If your application is withdrawn or denied;

If you ask to be removed from the WBEC database; and

Within one year of your failure to renew or provide information requested to evaluate your application for qualification.

Updating Your Information

Since we use your Information to help WBEs make contact with our members, who are potential purchasers or partners, it is important that all of the Information be accurate and up-to-date. If any of your Information changes, please inform us so that we can make any necessary changes.

Access to your Information

You may ask for access to the Information we hold about you. If the Information is extensive, we may provide summary information to you. More detailed requests, which require archive or other retrieval costs, may be subject to normal professional and copying fees.

Correcting errors and providing updates

If the Information we hold about you and your business is not accurate, complete and up-to-date, we will take reasonable steps to correct it.

Can I be denied access to my Information? Your rights to access your Information are not absolute. We may deny access when:

Denial of access is required or authorized by law;

Granting you access would have an unreasonable impact on the privacy of others, including other WBEs; or

If we determine that the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct Information, we will explain why.

Code of Conduct

Username – To help ensure network confidentiality, you may not share your access information with others

Respect – Common courtesies should be observed at all times when communicating with others in the network

Communication – It is not acceptable to use your network access to conduct mass sales or advertising campaigns to “spam” others

Changes to this Privacy Policy

This Privacy Policy is subject to change from time to time, to comply with changes in the law, in connection with changes to WBEC procedures. The current version of this Privacy Policy will be posted on our Internet web site at www.WBECCanada.org.

Contact for access

If you have any questions about this Privacy Policy or if you wish to obtain a summary of the Information we hold about you and your business, in order to review and update it, please contact the WBEC Privacy Officer via email at inquiries@WBECCanada.org or by calling 1-855-831-8169