

Privacy Policy

Your privacy

We take your privacy seriously and are committed to protecting it. Any personal information we collect on or through this website is governed by the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and is intended to comply with the ten (10) fair information principles, as set out in the National Standard of Canada Model Code for the Protection of Personal Information. These principles are:

1. **Accountability** – we have a designated Privacy Officer who is responsible for compliance with the fair information principles.
2. **Identifying Purposes** – we will identify the purposes for which personal information is collected before we do so.
3. **Consent** – we will ask you to consent to our collection, use and retention of your personal information before you provide it to us.
4. **Limiting Collection** – we will only collect personal information for the purpose of communicating with you and to provide information and services to you.
5. **Limiting Use, Disclosure, and Retention** – we will only use, disclose and retain personal information for the stated purposes. Personal information will be kept only as long as it is necessary and will then be removed from our records.
6. **Accuracy** – we strive to ensure that personal information is as accurate, complete and as up-to-date as is necessary.
7. **Safeguards** – we have security safeguards in place to protect any personal information in our records from loss or theft, as well as unauthorized access, disclosure, copying, use or modification, including physical, organizational and technological safeguards.
8. **Openness** – our Privacy Policy is posted on this website and we can communicate with you by phone or email if you have any questions about our personal information management practices.
9. **Individual Access** – upon written request, we will provide you with access to the personal information we have about you and will allow you to amend such information if it is inaccurate or incomplete.
10. **Challenging Compliance** – any complaints about our privacy policy will be investigated by our Privacy Officer.

Meaning of “personal information”

Section 2(1) of PIPEDA states that “personal information” means “information about an identifiable individual”.

Under PIPEDA, personal information includes any factual or subjective information, recorded or not, about an identifiable individual.

What information do we collect and for what purpose?

Personal information

We will only collect personal information that you provide to us and that is necessary for the purposes outlined below. Personal information we may collect includes:

1. Your name, address, email address or phone number if you contact us.
2. Your payment information if you subscribe to our services.

We will use your information for the following purposes:

- To communicate with you
- To provide information to you about our services
- To provide the services you request
- To process your payments
- To respond to questions and provide technical support for any services you use

In order to ensure that your personal information is accurate, we may occasionally ask you to verify or update it.

Please note that emails and other electronic communications may not be secure. It is advisable not to send any sensitive personal information (e.g., address, date of birth, credit card numbers, bank account details, SIN or Health Card numbers etc.) by email.

Web analytics

We use Google Analytics (GA) to measure user-interactions on the website and improve our services. GA uses Cookies to collect the following information:

- URL – the URL of the page the user is viewing
- Title – the title of the page the user is viewing
- Browser name – the browser the user is using
- Viewport or Viewing pane – the size of the browser window
- Screen resolution – the resolution of the user's screen
- Java enabled – whether or not the user has Java enabled
- Flash version – what version of Flash the user is using
- Language – derived from the language settings of the browser Location
- Location - this is derived from the Internet Protocol (IP) address; however, the IP address itself is not available in GA as it is personally identifiable information (PII) which violates the terms of Google Analytics. **We do not have access to or collect your IP address.**

When you visit any website, the web server automatically logs your Internet Protocol (IP) address, which is used to connect your device to the Internet. However, we do not have access to this information.

Cookies

Most browsers allow you to manage or disable cookies. Please check your browser preferences if you wish to do so.

For further information about cookies and privacy issues, please see the Office of the Privacy Commissioner of Canada's website here: <https://www.priv.gc.ca/en/privacy-topics/technology/online-privacy-tracking-cookies/cookies/frequently-asked-questions-about-cookies/>

Where do we keep your personal information?

We retain any personal information we have mainly electronically and on occasion in hard copy.

How is your personal information secured?

We take all reasonable precautions to ensure that your personal information is secure and protected from loss, theft, unauthorized access, modification, use, copying, or disclosure. Our safeguards include:

- **Physical security**
 - Locked filing cabinets
 - Restricted office access and alarm systems
- **Technological security**
 - Passwords and user IDs
 - File encryption
 - Firewalls and virus scanners
- **Administrative controls**
 - Written security rules
 - Staff training
 - Access restrictions
 - Regular audits to ensure compliance with security policies
 - Confidentiality agreements
- **Electronic records controls**
 - Passwords and User IDs to prevent unauthorized access
 - Automatic back-up for file recovery to protect records from loss or damage
 - Digital audit trail for all records

Who has access to or uses your personal information?

Only authorized staff have access to your information for the purpose of communicating with you, providing information and services, and processing payments.

Staff have received appropriate privacy training and will keep all personal information in the strictest confidence.

Who do we share your personal information with?

We will not share your information with any third parties without your consent, except in very limited situations, which are governed by sections 7(3)(d.1) and 7(3)(d.2) of PIPEDA. These sections allow for the disclosure of personal information to another organization for the purpose of investigating a breach of an agreement or a contravention of the laws of Canada or a province, or for the purpose of detecting or suppressing fraud.

When is your personal information disposed of?

Personal Information is kept only as long as is necessary. Any personal information you have provided to us will be deleted from our records as soon as feasible and, in any event, within 30 days of any request to do so.

We will dispose of your records (including electronic records and hard copies) in a secure manner that protects your privacy, including supervised shredding of paper records, and magnetically erasing or overwriting electronic records, in such a way that the information cannot be recovered.

Questions or Complaints

If you have any questions or concerns about our Privacy Policy or procedures, or if you wish to see the personal information we have about you, please contact our Privacy Officer at Privacy@entomogen.ca in the first instance.

If Entomogen does not address your enquiry or complaint to your satisfaction, you may file a formal complaint with the Office of the Privacy Commissioner of Canada (OPC). Details regarding complaints to the OPC may be found here: <https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/file-a-complaint-about-a-business/>

Access requests

Please note that we will respond to requests for access to your personal information no later than 30 days after your request is made. All access requests must be made in writing. In order to process any access request, you will need to provide enough information to enable us to locate the information and determine how it has been used or disclosed.

In order to protect our clients' privacy, we will need to verify the identity of anyone making an access request.