

Updated: January 30, 2017

NATIONAL NURSING ASSESSMENT SERVICE

PRIVACY STATEMENT

National Nursing Assessment Service (“NNAS”, “we” or “us”) is committed to protecting your privacy and safeguarding your Personal information.

The purpose of this Privacy Statement is to inform you about the types of Personal Information that NNAS collects, uses and discloses. It explains how we use and disclose that information, the choices you have regarding such use and disclosure, and how you may correct that information.

Your privacy is one of our priorities. We are proud to demonstrate our commitment to your privacy, by complying with the laws and regulations under applicable privacy laws in Canada – including, the *Personal Information Protection and Electronic Documents Act* and the regulations thereunder.

From time to time, we may make changes to this Privacy Statement. The Privacy Statement is current as of the “updated” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Statement under which it was collected, unless we have your consent to treat it differently. This Privacy Statement applies to any Personal Information we collect or receive about you, from any source.

The following topics will be covered in this Privacy Statement:

1. What is Personal Information?
2. How do we collect your Personal Information?
3. Where do we store your Personal Information?
4. How do we use your Personal Information?
5. To whom do we provide your Personal Information?
6. When and how do we obtain your consent?
7. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?
8. How long will we utilize, disclose or retain your Personal Information?
9. How can you review your Personal Information that we have collected, utilized or disclosed?
10. How do you know that the Personal Information we have on you is accurate?
11. What if the Personal Information we have on you is inaccurate?
12. How fast will we respond to your written requests?
13. Are there any costs to you for requesting information about your Personal Information or our privacy practices?
14. How do we know that it is really you requesting your Personal Information?
15. What safeguards have we implemented to protect your Personal Information?
16. How do you contact us regarding access to your Personal Information or our privacy practices?

1. What is Personal Information?

“**Personal Information**” is any information that is identifiable with you, as an individual. This information may include but is not limited to your name, mailing address, e-mail address, telephone number, and information that you submit to NNAS (or that third parties submit to NNAS on your instruction) concerning your academic and/or employment history (including curricula, transcript, previous employers). Personal Information, however, does not include any information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, or work electronic address.

2. How do we collect your Personal Information?

We will always collect your Personal Information by fair and lawful means. We may collect Personal Information from you directly and/or from third parties (such as academic institutions or previous employers), where we have obtained your consent to do so or as otherwise required or permitted by law.

3. Where do we store your Personal Information?

We will keep the Personal Information that we collect at the NNAS offices in Toronto, Ontario, or at our third party service providers in the United States.

4. How do we use your Personal Information?

Generally, we identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. We generally use your Personal Information for the following purposes (the “**Purposes**”):

- to process your application;
- to process transactions or payments;
- to respond to inquiries and other requests;
- to collect opinions and comments in regard to our operations;
- to provide you with information that we think may interest you;
- to recruit for positions at NNAS and for other employment-related tasks;
- to investigate legal claims;
- such purposes for which NNAS may obtain consent from time to time; and
- such other uses as may be permitted or required by applicable law.

5. To whom do we provide your Personal Information?

We do not sell or rent your Personal Information.

If we intend to disclose your Personal Information to a third party, we will identify that third party and the purpose for the disclosure at the time we collect such information from you and obtain your consent to such disclosure. For example, we will disclose your Personal Information to regulatory bodies to which your application relates.

We may transfer your Personal Information to third party service providers with whom we have a contractual agreement that includes appropriate privacy standards, where such third parties are assisting us with the Purposes – such as service providers that provide telephone support, data storage or processing, or hosting.

We may transfer your Personal Information outside of the country for the Purposes, including for process and storage by service providers in connection with such Purposes. However, you should note that to the extent that any Personal Information is out of the country, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. For written information about our practices regarding service providers outside of Canada, contact our Privacy Officer (see question 17 below).

6. When and how do we obtain your consent?

We generally obtain your consent prior to collecting, and in any case, prior to using or disclosing your Personal Information for any purpose. You may provide your consent to us either orally, electronically or in writing. The form of consent that we seek, including whether it is express or implied, will largely depend on the sensitivity of the Personal Information and the reasonable expectations you might have in the circumstances.

7. How do we ensure the privacy of your Personal Information when dealing with our affiliates and other third parties?

We take appropriate steps to ensure that all affiliates and other third parties that are engaged to perform services on our behalf and are provided with Personal Information are contractually required to observe the intent of this Privacy Statement and our privacy practices.

8. How long will we utilize, disclose or retain your Personal Information?

We will utilize, disclose or retain your Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

9. How can you review your Personal Information that we have collected, utilized or disclosed?

If you make a written request to review any Personal Information about you that we have collected, utilized or disclosed, we will provide you with any such Personal Information to the extent required

by law. We will make such Personal Information available to you in a form that is generally understandable, and will explain any abbreviations or codes.

10. How do you know that the Personal Information we have on you is accurate?

We will take steps to ensure that your Personal Information is kept as accurate, complete and up-to-date as possible. We will not routinely update your Personal Information, unless such a process is necessary. We expect you, from time to time, to supply us with written updates to your Personal Information, when required.

11. What if the Personal Information we have on you is inaccurate?

At any time, you can challenge the accuracy or completeness of your Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required. Where appropriate, we will transmit the amended information to third parties having access to your Personal Information.

12. How fast will we respond to your written requests?

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. You have the right to make a complaint to the Privacy Commissioner of Canada in respect of this time limit.

13. Are there any costs to you for requesting information about your Personal Information or our privacy practices?

We will not charge any costs for you to access your Personal Information in our records without first providing you with an estimate of the approximate costs, if any.

14. How do we know that it is really you requesting your Personal Information?

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your Personal Information. Any such identifying information shall be used only for this purpose.

15. What safeguards have we implemented to protect your Personal Information?

We have implemented physical, organizational, contractual and technological security measures with a view to protecting your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. We have taken steps to ensure that the only personnel who are granted access to your Personal Information are those with a business 'need-to-know' or whose duties reasonably require such information.

16. How do you contact us regarding access to your Personal Information or our privacy practices?

All comments, questions, concerns or complaints regarding your Personal Information or our privacy practices should be forwarded to our Privacy Officer as follows:

Address: NNAS Privacy Officer
439 University Avenue
5th Floor Suite 546
Toronto, ON
M5G 1Y8

By e-mail: info@nnas.ca