

# Privacy Policy – Mentor Connect

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Effective Date: August 08, 2022

Mentor Connect, a Mentorship Partnership initiative of Trenval Business Development Corporation.

Our Commitment: Trenval Business Development Corporation is committed to protecting your privacy and maintaining the confidentiality of your personal information relating to your use of the [mentoringconnect.ca](https://mentoringconnect.ca) and services provided thereby (the “Website”).

During your use of the Website, MENTOR CONNECT occasionally gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. MENTOR CONNECT’s privacy practices are designed to achieve this.

Please note that MENTOR CONNECT, under the direction of [Trenval Business Development Corporation](#), reviews its privacy practices for various activities from time to time as needed. Any revisions to this privacy policy (the “Privacy Policy”) will be made available on the Website.

*By accessing the Website, you agree to this privacy policy.*

If you do not consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy, do not provide us with any personal information and if you are an active user of any services available via the Website you can close your account for such services. It is important to note that some of Mentor Connect services can only be provided if we receive appropriate and required personal information. Consequently, should you choose not to provide us with the required personal information, we may be unable to offer these services to you.

## Personal Information

Personal information is information that can be used to distinguish, identify or contact a specific individual. This information can include an individual’s opinions or beliefs, as well as facts about, or related to, the individual. Examples of personal information may include SIN #, age, marital status, and language. Exceptions: business contact information and certain publicly available information, such as names, addresses, and telephone numbers as published in telephone directories, are not considered personal information.

Personal information may be provided to MENTOR CONNECT through submission of information to MENTOR CONNECT, use of any MENTOR CONNECT services available via the Website, or other forms of communication.

## Privacy Practices

Personal information gathered by MENTOR CONNECT is kept in confidence. MENTOR CONNECT personnel are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to ensure the integrity of this information is maintained and to prevent its being lost or destroyed.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate considering the circumstances.

MENTOR CONNECT will not provide or share your personal information with third parties unless the following applies:

- You authorize us to share the information;
- Sharing the information is necessary, for example, to provide products or services to you, or to generate, maintain, and utilize a user's account relating to the Website;
- To generate analytics and statistical data; or
- We are required by law.

## Consent

Privacy legislation requires MENTOR CONNECT to obtain the consent of an individual to the collection, use or disclosure of personal information in many circumstances.

By providing your personal information to MENTOR CONNECT, you agree that we may collect, use and disclose your personal information in accordance with this Privacy Policy and as otherwise permitted or required by law, and that we may access, process and store your personal information in Canada or another jurisdiction.

When we receive personal information from you for the purposes of providing you with use of the Website or any of our products or services, or for other uses identified herein, you are providing us with consent as follows:

1. to allow us to deal with that personal information in a reasonable manner;

2. to allow us to provide your personal information to third parties we engage to provide or support the Website and any products or services provided to you;
3. to allow us to use and store your personal information for the purpose of providing you with access to the Website, and any products and services you obtain from us and to utilize the Website and such products and services; and
4. to allow us to transfer your personal information outside of Canada (whereby your personal information will be treated in accordance with applicable foreign laws) for the purpose of storage and use of your personal information by MENTOR CONNECT.

If you need to provide us with personal information about other individuals, you represent and warrant to us that, where required by law and prior to your disclosure to us, you will obtain the consent of each individual to the collection, use and disclosure by us for the specific purpose(s) that the disclosure is made by you.

Providing us with your personal information is always your choice. When you access and use our Website or request products and/or services from us, or utilize our products or services, we ask that you provide information that enables us to respond to your request and/or provide you with our products, services and/or the Website. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes.

If we merge our organization with another party, your consent will be implied to transfer your information to our successor for the same purposes as set out in this Privacy Policy.

## Consent Exceptions

There are legal exceptions where we will not need to obtain consent or explain the purposes for the collection, use or disclosure of personal information. Some examples of situations where consent is not required include an emergency that threatens the life, health or security of an individual, or if we must comply with a court order or governmental order.

We may use personal information without your knowledge or consent in limited circumstances whereby we are required to provide personal information to third parties for legal or regulatory purposes. For example, under certain exceptional circumstance we may have a legal duty or right to disclose personal information without your knowledge or consent. Various government agencies such as the Canada Revenue Agency, Human Rights Commission, Ontario Ministry of Finance, Ontario Ministry of Labour, and law enforcement, have the authority to review our files and interview our staff when deemed necessary. These agencies have their own strict privacy obligations.

## Limited Collection

We will only collect such information that is deemed necessary to meet the purpose for which such personal information is collected.

## Limited Use, Disclosure and Retention

Mentor Connect collects and manages the personal information you provide in accordance with the Freedom of Information and Protection of Privacy Act of the Province of Ontario<sup>1</sup>. We will only use your personal information in accordance with this Privacy Policy. If in the course of managing its operations MENTOR CONNECT shares your personal information with professional advisors, franchisees, suppliers, any such entities shall be required to comply with privacy guidelines that impose obligations at least commensurate with this Privacy Policy. MENTOR CONNECT does not sell or disclose personal information to third parties, other than in compliance with this Privacy Policy and as required to satisfy any law, regulation, legal request, to protect its business interests, and to co-operate with any law enforcement investigation or on matters concerning public policy and safety.

## Website and Electronic Communications

MENTOR CONNECT uses services requiring password protocols and encryption software to protect personal and other information we receive when a product or service is requested and/or paid for online. All such third-party service providers must be in compliance with PIPEDA and have an established and published privacy policy available for all users.

The privacy of users of the Website is very important to MENTOR CONNECT. MENTOR CONNECT respects your privacy and is committed to protecting personal information you provide to us. This Privacy Policy is always available at [mentoringconnect.ca/privacy-policy](https://mentoringconnect.ca/privacy-policy).

Personally identifiable information is not collected unless specifically submitted via an online function or form, a submission to the Website, an electronic mail message, a phone call or postal mail. All information is kept confidential – this is subject to any legal requirements to disclose. All information is protected by MENTOR CONNECT's physical, electronic and managerial security methods, which are updated as necessary.

Information you provide through the Website may be used periodically to keep you informed of MENTOR CONNECT and its member agencies, including programs, services, opportunities to volunteer, events, funding needs, membership benefits. If at any time you no longer wish to receive such information, please contact us at: 1-613-961-7999 or via email at [info@trenval.ca](mailto:info@trenval.ca).

*Effective Date: 8 August 2022*

The Website may provide links to other third-party websites. These are provided for convenience only and you access them at your own risk. Even if a third party is associated with MENTOR CONNECT through a business relationship or otherwise, MENTOR CONNECT is not responsible for the privacy policies or practices or content of such third-party websites.

Each time the Website is utilized by a user, our web server or other tools may collect and log certain information in access logs. Such access logs may be kept for a reasonable period of time. Such access logs may include, but not be limited to, information such as the following: your machine's TCP/IP address, files accessed, the date and time of such access, and other information pertaining to your activities on the Website. These logs are used solely for performance, site administration and security reviews. They are not sold or shared in any way to third party organizations. We may use this non-personal information to optimize the Website, and our services and products.

We may collect anonymous information as you navigate and/or interact with the Website. We may use anonymous information to operate and improve the Website. We may also use anonymous information to track what visitors to the Website are looking at most frequently so we can recognize and deliver more of the desired features, products, and services.

By accessing and browsing the Website, or our products and/or service(s), you agree that MENTOR CONNECT, or any third party it engages or that assists it, may collect, use and disclose any information collected about you through the Website, or our products and/or services or that you provide to us through the Website, or our products and/or services as described in this Privacy Policy.

We may use web beacons alone or in conjunction with cookies to compile information about you and your usage of the Website, as well as your interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, we may use web beacons to operate and improve the Website and email communications. We may use information from web beacons in combination with personal information about you to provide you with information about us and our products and services.

The Website, and our products and/or service(s) may contain links to other sites and may provide forms on behalf of other organizations, including but not limited to third party payment facilities. This Privacy Policy only applies to personal information that we collect, use and disclose. We are not responsible or liable for the privacy practices of third parties, including any organizations on the behalf of which we provide forms, links or information, and we strongly

recommend that you review a third party's privacy policy before disclosing any personal information to the third party.

## Accuracy

While MENTOR CONNECT collects the personal information that you supply, it does so with the understanding that any such information is as accurate. It is important to us that your personal information held by us is accurate and complete. Having accurate information about you enables us to provide you with better use of the Website, products and services. You can help us keep personal information up-to-date by keeping us informed of any changes, such as a change of address, telephone number or any other circumstances. We will not be able to provide you with any notices if we do not have accurate contact information for you and we will bear no responsibility for any action or omission as a result of our lack of accurate contact information for you.

## Retention and Destruction of Personal Information

The amount of time we will retain personal information varies, depending on the products and Services we have provided and the nature of the personal information that we hold. We retain personal information for such period of time as is necessary for us to maintain sufficient information so we may respond to any issues that arise at a later date or as is required by law.

When personal information is no longer required by us or by law, we will either convert it into an aggregated non-identifying form or we will appropriately destroy or erase the personal information in a manner that is in accordance with our current policies and procedures.

You will bear full responsibility for the storage, maintenance, control and protection for all data that is processed or otherwise utilized by MENTOR CONNECT and for Website features and our products and services that require data input. We bear no responsibility for such data whatsoever.

## Transfers of Personal Information

MENTOR CONNECT is responsible for your personal information, which it processes and stores in Canada, in accordance with the terms of this Privacy Policy. If you are not resident in Canada and/or are located of Canada, you bear all responsibility for ensuring that your use of our Website is compliant with all applicable laws.

## Access to Your Information

You are entitled to: know whether we hold personal information about you; see that information; and ensure it is accurate. Personal information is securely maintained by the head office of MENTOR CONNECT\*. If you would like to access your personal information, or have any questions about the protection of your privacy, please contact:

Privacy Officer  
Trenval Business Development Corporation  
284B Wallbridge-Loyalist Road,  
Belleville, ON K8N 5B3  
[info@trenval.ca](mailto:info@trenval.ca)

\*It is important to note that Trenval Business Development Corporation is a federated funded not-for-profit local Community Futures Organization within Ontario, Canada.

Further information on privacy and your rights in regard to your personal information may be found on the website of the [Privacy Commissioner of Canada](#)<sup>ii</sup>.

In some situations, we may not be able to provide access to certain personal information as the right to access personal information is not absolute. If we do not provide you with the requested information, we will notify you in writing and explain our reason(s) for not fulfilling your request.

## Withdrawal of Consent

You may, at any time, withdraw your consent to MENTOR CONNECT's collection, use and disclosure of your personal information, subject to reasonable notice and any legal and/or contractual restrictions.

Should you choose to withdraw your consent, MENTOR CONNECT may be unable to provide, or continue to provide, the access to the Website that can only be provided if MENTOR CONNECT receives appropriate and required personal information.

## Our policy on children's information

We do not knowingly collect the personal information of children or anyone below the age majority in their applicable jurisdiction. If we believe any person under the age of majority in his

or her jurisdiction of residence is using the Website, we will not process any personal information of that person.

### Changes to this Privacy Policy

This Privacy Policy is effective as of the date indicated herein. MENTOR CONNECT reserves the right to change this Privacy Policy, and any of MENTOR CONNECT's policies and procedures concerning MENTOR CONNECT's practices for handling personal information, at any time and without any prior notice. If MENTOR CONNECT has modified or amended our Privacy Policy, MENTOR CONNECT will post the most current version on the Website. Any changes that are made to this Privacy Policy will apply to both any personal information that MENTOR CONNECT holds prior to the effective date of the amended Privacy Policy and any personal information that MENTOR CONNECT collects on or after such effective date.

You should review this Privacy Policy and all policies regularly to make sure that you are aware of any changes. Your access to use of the Website on and after the date on which we post the revised terms constitutes your acceptance of the Privacy Policy as revised as well as of any revised policies.

### Successors and Assigns

MENTOR CONNECT's successors and assigns may collect, use and disclose your personal information for substantially similar purposes as described in this Privacy Policy.

Trenval Business Development Corporation, 2022.

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<sup>i</sup> <https://www.ontario.ca/laws/statute/90f31>

<sup>ii</sup> <https://www.priv.gc.ca/en/>