



## Corporate Privacy Policy Respecting the Collection, Use and Disclosure of Personal Information (“Privacy Policy”)

Last updated: July 5, 2021

### Canadian Heart Rhythm Society

The Canadian Heart Rhythm Society (CHRS) provides a forum for cardiovascular professionals to exchange ideas, advance knowledge, improve practice and care delivery in the prevention, diagnosis, and management of all heart rhythm phases and complications.

The CHRS interacts with the [Canadian Cardiovascular Society \(CCS\)](#) as an affiliated organization in matters associated with the continuum of heart rhythm. CHRS strives to provide guidance for medical trainees in Canada, while advocating for heart rhythm patients, their families, and professionals providing care to those living with the risks of complications heart rhythm.

The CHRS is a data controller and processor of factual or subjective information, recorded or not, that can be used to directly or indirectly distinguish, identify or contact a specific individual (“**Personal Information**”). Personal Information may be collected and processed through the services offered by CHRS. Note that some Personal Information may be found in the public domain by accessing publications such as telephone directories online.

### What is the scope of this Privacy Policy?

This Privacy Policy applies to all Personal Information collected, used, or disclosed by us, whether **from** a CHRS Member, prospective member, or others who have expressed an interest in the CHRS or have participated in an event sponsored or organized by the CHRS.

CHRS keeps Personal Information as long as it is needed to fulfill the purposes identified below, or otherwise identified in advance of a request for consent. When Personal Information is no longer required to fulfill the identified purposes, the CHRS applies all commercially reasonable safeguards to safely and securely destroy said Personal Information.

### Commitment to Privacy of Personal Information

The CHRS is committed to protecting the privacy of its members and others who use CHRS products and services. This Privacy Policy sets out our practices regarding the collection, use and disclosure of Personal Information in connection with the products and services the CHRS provides, including our websites, such as <https://www.chrsonline.ca/> and <https://chrsonline.timedright.com/app/login.html>. By becoming a CHRS member, maintaining such membership, attending a CHRS event or program, communicating with CHRS, taking part in a committee/working group or otherwise receiving services from the CHRS, you consent to our collection use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy.

The CHRS collects, uses, and discloses Personal Information only with valid legal consent of the individual, except as otherwise permitted or required by law. Members and users can withdraw their consent to the use of their Personal Information by contacting the CHRS and informing the CHRS Privacy Officer at 1-877-569-3407 ext. 402 or [chrs@ccs.ca](mailto:chrs@ccs.ca) of that request. CHRS services are not directed to children under the age of 16. You may not use our services if you are under the age of 16.

CHRS makes every reasonable effort to protect the Personal Information we collect by implementing commercially reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. We ensure that CHRS employees are aware of the importance of maintaining the confidentiality of Personal Information.

### **Changes to this Privacy Policy**

The CHRS changes constantly, and the Privacy Policy may be updated from time to time, to reflect developments in its practices, new technology or the law. Please check our website frequently to see recent changes. The CHRS will include a *News Update* when the Privacy Policy is updated and will notify members/users with notification of Privacy Policy updates through electronic communications. Unless stated otherwise, our current Privacy Policy applies to all information that we have about an individual. The CHRS will never materially change its Privacy Policy to make it less protective of an individual's information collected in the past without the consent of the affected individual.

### **What type of Information does CHRS collect and use?**

The Personal Information that CHRS generally collects processes and uses includes names, first names, surnames, email addresses, date of birth, names of affiliated institutions and/or employers, addresses or any geographic indications, professional specialization, usage data, IP addresses, phone numbers, social media account information, degrees/certifications and information collected through cookies, and other tracking technologies, and banking or credit card information (card number, type, CVV code, expiry date and billing address – collectively, "Payment Information"). Per PCI Compliance, we do not accept Payment Information via email. Payment Information received via fax, phone, or mail is entered into a secure system and then destroyed after use. Members and users may voluntarily provide additional information in their membership/contact profile, such as areas of major interest and areas of interest in serving the CHRS.

CHRS assigns a personal identifier to each member or **user** in our database so that **individual** can use this number when contacting us or registering for an event.

**The collection of personal information will be limited to that which is needed for the specific purposes identified by the CHRS within the Privacy Policy and/or at the time of collection.**

### **Accuracy**

The CHRS seeks to ensure that the Personal Information it collects, processes and/or uses is accurate and up to date. Please assist the CHRS Privacy Policy Officer by advising of any inaccuracies so that appropriate corrections can be made. Alternatively, members and users may edit their profile via [MY.CCS.ca](http://MY.CCS.ca) at any time to change, add, or remove Personal Information.

## Why does CHRS collect and use your Personal Information?

### 1. *Membership*

The CHRS collects and uses Personal Information from members and individuals who are applying to become members of the CHRS for the following purposes to:

- determine an individual's eligibility for membership in the CHRS;
- process a membership application or renewal;
- collect and process membership dues;
- keep members informed about CHRS programs, services and activities such as educational programs, update and published practice guidelines, etc.;
- provide members with periodic newsletters and updates, announcements and special promotions regarding CHRS products and services;
- keep members informed about information, activities and events of other organizations on topics related to the aims of the CHRS;
- gain insight, develop and market products and services that are tailored to the interests of members and those registering to our events;
- assist CHRS with the maintenance of our membership database and other individual contacts;
- engage members of the cardiovascular community;
- respond to members' questions and communications;
- analyse the demographics and segmentation of the membership for future planning purposes;
- contact members with respect to requesting their participation in the affairs of the CHRS, such as committees and working groups; and
- help us understand our members' needs and interests to better tailor our products and services meet members needs.

### 2. *Participants in the Annual Meeting and Events*

The CHRS collects and uses Personal Information of participants in the Annual Meeting and other events for purposes including but not limited to the following:

- to process registration before an event;
- to carry out the organization and administration of the event, including facilitation of accommodation and event particulars for delegates, development of marketing, programming and event material, and confirmation of event attendance;
- to make a list of attendees (those who have consented) available at an event;
- to submit and review scientific work / presentation for consideration for presentation at an event;
- to invite participants to future events that are likely to be of interest to them;
- to notify participants about the benefits of joining CHRS; and
- in certain circumstances, limited Personal Information may be shared with exhibiting companies and/or sponsors as it relates to their participation in the event. CHRS does this in order to inform you about services or products we believe might be of interest to you.
- Usage Data is not collected for the purpose of identifying the end-user. See section titled De-identification of personal information.

## **Who does CHRS share or disclose Personal Information with?**

The CHRS is responsible for all Personal Information under its custody and/or control, including information which it may transfer to a third party for processing or those who provide services to CHRS. CHRS will only share Personal Information with the consent of the individual(s), whose Personal Information is to be shared.

Where the CHRS discloses Personal Information to a trusted third-party organization, the CHRS will enter into a written agreement to require such third parties to use the Personal Information only for the purposes for which it is provided to them, and to protect the privacy of the Personal Information in accordance with privacy laws and in a manner that is consistent with this Privacy Policy.

## **Consent**

The CHRS uses Personal Information only with meaningful legal consent of the respective individual(s), except as otherwise permitted or required by law. The consent provided for the use of Personal Information is for the specified, explicit and legitimate purposes as outlined in this Privacy Policy, and/or as otherwise specified prior to express consent. An individual may withdraw his or her consent to the use of Personal Information by contacting the CHRS Privacy Officer at 1-877-569-3407 ext. 402 or [CHRS@ccs.ca](mailto:CHRS@ccs.ca). In addition, when an individual submits a membership application or membership renewal, or registers for a physical or virtual event, the individual will be given an opportunity to opt-out of receiving further information from the CHRS or from any other third party. The CHRS will explain the consequences if the individual decides to withdraw their consent for CHRS to use their Personal Information. Any request to withdraw consent will be processed within the legally required time periods.

Although there is no obligation to provide Personal Information to CHRS, CHRS reserves the right to withhold any of its services, including event participation, where an individual does not provide the relevant Personal Information required to carry out at least one of the purposes of the service in question.

## **De-identification of Personal Information**

The CHRS may de-identify information by removing any identifier of a specific individual or household from Personal Information, such that it no longer falls within the definition of Personal Information (“De-identified Information”). De-identified Information may be used by the CHRS for the purposes of reporting and analyzing how users interact with CHRS Apps and/or for other research purposes, such as research regarding behavioral inferences. CHRS may share De-identified Information and resulting reports and analyses publicly and with other third parties.

## **Information Received from Other Sources**

The CHRS sometimes uses mailing lists from other organizations with whom the CHRS participates in organizing or sponsoring programs, publications, seminars, conferences or other events. When the CHRS does so, these other organizations are required to provide only the information of individuals who have consented to the sharing of their information to the CHRS. When the CHRS uses the individuals’ Personal Information, the CHRS will provide the individuals with information in accordance with applicable law. The information provided to the individuals may include identity and contact details of the CHRS, contact details of the CHRS’ Privacy Officer, purposes of information processing/usage, legal basis for the information processing/usage, and the ability of the individual to withdraw consent. The CHRS will inform the individual of the use of their Personal Information within a reasonable period of time as prescribed by the applicable law. At the time of contact, the CHRS will ask the individual whether or not further communications from CHRS is desired. The CHRS will respect the wishes of the individual.

## **Website**

The CHRS provides information and some member services via its websites <https://www.chrsonline.ca/> and <https://chrsonline.timedright.com/app/login.html> (the “Sites”).

## **Information for Healthcare Professionals**

Some of the material on the Sites are made available only to healthcare professionals. In order to access this information, a user is asked to register and to provide Personal Information, including information about professional qualifications. This information is used for the purpose of verifying the user's status as a healthcare professional. The CHRS may also use this information to send a user further information about CHRS website activities in accordance with the wishes the user expresses on the registration form. Lists of registrants on the Site are not disclosed to other organizations.

## **Cookies**

This Sites use cookies to offer you a better browsing experience. Learn more about how the Canadian Heart Rhythm Society uses cookies and how to change your settings by reviewing our Privacy Policy. Cookies are small amounts of data that are transferred to a user's browser. Cookies are used to customize the site to an individual's interests or to retain Personal Information, such as a password, for the next visit. Upon the valid legal consent of the user, the Site may use the cookies. The user can withdraw their consent for CHRS' use of cookies by contacting the CHRS Privacy Policy Officer. Additionally, the user can set his or her browser not to accept cookies and still access the Site, although as a result, certain areas of the Site may be unavailable or difficult to use.

## **Personal Data Collected Through Sites**

The CHRS may collect personal data through your use of the Sites websites <https://www.chrsonline.ca/> and <https://chrsonline.timedright.com/app/login.html>, including (without limitation) member ID number, password and email address. Certain information about a user's computer may also be collected when you access the Sites, such as the type of the internet browser and operating system of a user's computer and where applicable a user's IP address and information relating to a user's internet service provider.

You are not required by law to provide your Personal Information for the purpose of visiting the Sites but CHRS may be unable to provide you with the information, services and facilities you may require unless you provide CHRS with the requested Personal Information data for administration, security or other reasons.

## **Linked Websites**

We are not responsible for the contents available on, or the set-up of, or the Personal Information collected (if any) by, any other websites linked to our Sites. Linking or access to and use of such other websites is at the user's own risk and subject to any terms and conditions applicable to such accessor use.

## **Safeguards**

The CHRS protects Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, modification and destruction by using appropriate security measures in accordance with applicable law.

The CHRS designs its systems with security and privacy in mind. We work to protect the security of Personal Information during transmission. We follow the Payment Card Industry Data Security Standard

(PCI DSS) when handling credit card data. The CHRS also maintains physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of Personal Information. Our security procedures require that we may occasionally request proof of identity before we disclose Personal Information to you. It is also important for the member/user to protect against unauthorized access of their password and computers, devices, and applications. Be sure to sign off when you finish using a shared computer.

The CHRS' employees with access to Personal Information are required to respect the confidentiality of that information pursuant to their employment agreement with the CHRS. Employees also participate in privacy training. The CHRS implements methods of protecting Personal Information that include reasonably limiting access to the Personal Information, restricting access to offices where information is held and technological measures such as passwords.

### **How can you get access to your Personal Information?**

Subject to applicable law, a member or user may request access to the Personal Information held about him or her at anytime. Alternatively, members can access their profile via [MY.CCS.ca](http://MY.CCS.ca). An individual has the right to request access to, correct, and delete their Personal Information, and to ask for data portability. The individual may also object to CHRS' processing of their Personal Information or ask that the CHRS restrict the processing of their Personal Information in certain instances. If you wish to do any of these things, please contact the Privacy Officer at 1-877-569-3407 ext. 402 or [chrs@ccs.ca](mailto:chrs@ccs.ca)

The CHRS will endeavour to respond to any such request as quickly as possible and, in any event, within the legally required time periods. Subject to certain exceptions and limitations prescribed by law, an individual will be given access to any Personal Information the CHRS holds about the individual. For example, the individual may be able to obtain confirmation as to whether his or her Personal Information has been processed, when, where and with what purpose. Any information provided to the individual will be provided in a commonly used and machine-readable format. The CHRS will correct or amend Personal Information that is shown to be incomplete or inaccurate with the individual's consent and in accordance with applicable law.

### **Breach Notification**

In case of a Personal Information breach by the CHRS and the breach is likely to result in a risk to the rights and freedoms of the individual, the CHRS will without undue delay notify the individual and the supervisory authority of the breach in accordance with applicable law.

### **Questions and Complaints**

For further information about this Privacy Policy or the practices of the CHRS related to Personal Information, or to make a complaint, please contact the CHRS Privacy Officer at 1-877-569-3407 ext. 402 or [chrs@ccs.ca](mailto:chrs@ccs.ca). The CHRS will investigate all complaints and take appropriate action as a result of such investigation.