



## **Privacy Statement – Use of Personal Information (IHE)**

**The Institute of Health Economics values your privacy.**

This Privacy Statement of the Institute of Health Economics (IHE), 1200 – 10405 Jasper Avenue NW, Edmonton, Alberta T5J 3N4 ("IHE" "we" "us" or "our") outlines how your personally identifiable information and other data relating to you (your "personal data") will be collected, used, and shared in connection with your access to and/or use of IHE.ca, and affiliated sites NOAHE.ca and AlbertaRWE.ca, and any content, features, services, or other offerings that the IHE may provide in connection therewith (collectively, the "Site"). This Privacy Statement also describes your choices and rights regarding the use, access, and correction or deletion of your personal data.

### **1 How We Collect and Use Your personal data**

#### **1.1 Summary**

The IHE uses your personal data to enhance, personalize, and support your experience on the Site and to improve the services we provide. The IHE is committed to your privacy and will not share personal data with any third party without your consent, except as outlined in this Privacy Statement or as required by law.

If you have any questions regarding this Privacy Statement or how to remove or modify your personal data or related consents, please feel free to contact us by e-mail at [info@ihe.ca](mailto:info@ihe.ca) or the mailing address below. Our mailing address is:

Institute of Health Economics  
1200 – 10405 Jasper Avenue  
Edmonton AB, T5J 3N4

#### **1.2 What Legal Basis Do We Have For Using Your personal data**

The IHE will process your personal data on the legal bases of consent, contract (if you have entered into an agreement with us and such processing is a necessary part thereof), or legal obligation. The IHE may also process certain personal data on the basis of the following legitimate interests, provided that such interests are not overridden by your privacy rights and interests: delivering and continuing to develop and improve the Site, learning from your behavior on the Site (e.g., analyzing traffic) to better serve you and other Site users, helping us modify or enhance the Site and its content, receiving insight as to what users do (and do not) like about our Site or aspects thereof, and providing a stable, consistent, and secure user experience in connection with the Site.

#### **1.3 How We Gather Your personal data**

The IHE collects personal data when you use the Site. Sometimes you may submit it to us yourself, other times it may be collected automatically.

#### **1.4 Information Submission forms on the Site and personal data collected**

(a) Information generally collected via Contact Us Forms on the legal basis of consent:

- Your Name
- Email address
- Message/ What are you looking for?



- (b) Information generally collected via Subscribe to Us Forms on the legal basis of consent:
- Your Name
  - Email Address
  - Job Title and Organization
  - Country, Province/State
  - Topics that are of interest (e.g. events, news and publications, programs)
  - Field of occupation (e.g. academic, government agency, industry, non-profit organization, public, researcher, other).
- (c) Information generally collected via Membership Registration Forms on the legal basis of consent:
- Username
  - Email
  - Password
  - Resume (NOAHE.ca)
  - Biography (NOAHE.ca)
  - Headshot (NOAHE.ca)
- (d) Cookies

The IHE uses cookies, a small data file that is written to your computer's hard drive by your web browser to track the pages and number of times you have visited. This Site uses the following types of cookies whose scope and function are described below:

- (i) Session cookies which are automatically deleted when you close your browser. They store what is known as a session-ID enabling various requests from your browser to be assigned to the session. This enables us to identify your computer the next time you visit our Site.
- (ii) Persistent cookies which are automatically deleted after a specific time which may differ depending on the cookie. You can delete cookies in the security settings of your browser at any time.

Cookies enhance the convenience and use of our Site. When you visit our Site, we check whether your browser supports cookies and this information is stored in another cookie. You may choose to decline cookies if your browser permits, but doing so may reduce the quality of your browsing experience and affect your ability to access certain features of our Site. We base the processing of cookies' personal data on your consent.

- (e) Web Beacons

The IHE uses web beacons, invisible images often referred to as pixel tags or clear GIFs that help track website traffic and behaviour to recognize users, assess traffic patterns, identify preferred content, and measure Site engagement. We also include web beacons in our e-mail messages, including newsletters, to count how many e-mail messages have been opened. Legal basis: consent.



(f) Log Files

The Site's web and ad servers log information about a user's IP address, browser type, and the current URL the user is requesting. This information is always provided by a user's browser and automatically logged by most websites. These log files are used in our internal analysis of traffic patterns within our website. The Site uses apache log files to keep record of traffic and for system administration purposes. Legal basis: legitimate interests.

## 1.5 How We Use Your personal data

The IHE's primary goals in collecting, using, and sharing personal data are to enhance your experience on the Site, support the Site, and improve its features, performance, and other elements. We will not use your personal data without a valid legal basis to do so. Your personal data may be used for the following purposes:

- (a) **To analyse Site usage and to ensure Site content is relevant:** to analyse your usage of our Site and to develop and provide content to you that is targeted to your interests. The IHE uses the analytics collected by the systems described above to determine which areas of our Site you prefer based upon the frequency of your visits and engagement with those areas. We may make reasonable assumptions based on your browser provided data to target relevant content and advertising to you on our Site and elsewhere where we may be acting as a 3rd party. We may also make reasonable geographic and demographic assumptions based on your presented IP address to target relevant content. Legal basis: legitimate interests (to allow us to provide you with the content and services on the Site)
- (b) **For marketing purposes:** to provide you with communications, such as, but not limited to, notifications of new opportunities (e.g., career opportunities, internship/fellowship awards) or events to the e-mail address that you provide to us. Such communications are provided only to users who have expressly provided us with their consent to receive communications as part of their subscriber or member preferences. Legal basis: consent.
- (c) **To provide our services to you and to conduct our business:** to administer and perform our services, including to carry out our obligations arising from any agreements entered into between you and us. We may, for example, ask you for personal data, such as your e-mail address, when you register to become a member of the IHE (or affiliated groups, NOAHE.ca and AlbertaRWE.ca). We may also ask you for personal data when you sign up to attend webinars and/or other events associated with the IHE. You always have the option not to provide the information we request. Legal basis: contract performance.
- (d) **To fulfil our legal or regulatory obligations:** to comply with our legal obligations (performing client due diligence, anti-money laundering, anti-bribery, sanctions screening, identifying conflicts of interests) and for the prevention of fraud and/or other relevant background checks as may be required by applicable law. Legal basis: legal obligations, legitimate interests (to cooperate with law enforcement and regulatory authorities)

## 1.6 Sharing of Your personal data

The IHE may disclose your personal data if required to do so by law, such as to comply with a subpoena or in the good faith belief that such action is necessary to conform to the edicts of the law, and/or comply with a judicial proceeding, court order, or legal process served on the IHE, or to protect and defend the rights or property of the IHE.



We may also share your personal data for the purposes stated in this Privacy Statement with our service providers, contractors, agents, advisors that perform activities on our behalf.

We may use a third party service provider to conduct surveys; that company will be prohibited from using our users' personal data for any other purpose. We will not share the information you provide through a survey with other third parties.

## **2 Security**

Your personal data is stored on the IHE servers located in Canada. We use industry standard physical, electronic, and organizational safeguards to protect your personal data against loss or theft as well as unauthorized access and disclosure. We treat data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us at the address provided below:

Email: [privacy@ihe.ca](mailto:privacy@ihe.ca)

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## **3 Privacy of Children**

The Site is intended for people who are at least 16 years of age. If you are less than 16 years old, please do not send any personal data to us – including information such as your name, address, or e-mail address. We do not knowingly collect (nor do we wish to collect) any personal data or other user information from children under the age of 16. In the event that we learn we have collected any personal information from a child under the age of 16, we will delete that information from our database and terminate the corresponding account, if any. We encourage you to discuss the Site with your parent or guardian.

## **4 Cross-border Transfers**

If you access or use the Site outside of Canada, your user information will be transferred to our servers in Canada which is approved by the European Commission as providing essentially equivalent protections to the EU data privacy laws and therefore no additional safeguards are required to export personal data to Canada.

## **5 Retention of personal data**

The IHE will retain your personal data only for as long as it is necessary for the purposes set out in this Privacy Statement. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (e.g., if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The IHE will also retain usage related data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obliged to retain this data for longer time periods.

## **6 Requests for Access to Data and Your Other Rights**

If you wish to exercise your rights with respect to your personal data stated below, please contact us at [privacy@ihe.ca](mailto:privacy@ihe.ca).



In certain circumstances, you have the following data protection rights:

- The right to access, update, or delete your personal data that we have collected. Whenever made possible, you can access, update, or request deletion of your personal data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your personal data rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your personal data if (a) we are processing personal data based on legitimate interests, (b) if we are using personal data for direct marketing purposes, or (c) if personal data is being processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where the IHE relied on your consent to process your personal data.

Please note that we may ask you to verify your identity before responding to such requests.

If you are a resident of the European Union, you have the right to complain to a Data Protection Authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Union.

## 7 Changes to this Privacy Statement

We may update our Privacy Statement periodically and will notify you of any changes by posting amendments on this webpage and links to those changes under Latest News on our main page IHE.ca

We will also let you know by email and/or on our homepage prior to the change becoming effective. Changes to this Privacy Policy are deemed effective once posted to this page. **This Privacy Statement was last updated August 23, 2019.**