The Eastern Canada Vipassana Foundation's Policy for the Protection of Personal Information

A local complement to the International Privacy Policy.

Last update: November 18, 2021

This Policy for the Protection of Personal Information is the local policy of the Eastern Canada Vipassana Foundation, and is a complement to the International Policy.

Introduction

The Eastern Canada Vipassana Foundation (the Foundation) accords great importance and respect to personal privacy, and therefore established a policy for the protection of personal information as early as 2001. Various practices and procedures already ensure the confidentiality of any information that we gather, and these practices have continued to evolve over the years, including when the online registration platform was introduced. An important update to this policy came into effect on May 25, 2018.

The Foundation has drawn up the present policy for the protection of personal information in order to explain the way in which it is collected and used after a person completes an application form, a registration form on the day of arrival at the centre, or, if applicable, the various health forms required to process a request to participate in a meditation course.

The Collection of Personal Information

The Foundation gathers personal data in order to assess a person's request to participate in a meditation course or to serve at the Quebec Vipassana Centre; that is, when a person:

- applies to meditate in or to serve a course, or
- applies for the sit-serve program.

If anyone communicates with the Centre to share a comment, ask a question, or pass on a complaint, either by e-mail, telephone or in person, we might also ask for identification, such as a name, address, or telephone number, as well as any other information that might be required so that we can respond promptly. We might keep this information to help thie person in the future or to improve our services.

Access to data and the Confidentiality Agreement

In order to protect the personal information in its care and under its control against theft or loss, and against unauthorized access, use, modification or disclosure, the Foundation has implemented reasonable administrative safeguards, both technical and physical. The Foundation permits the registrars to have access to personal information so that they can perform their duties. Access to personal information is on a need-to-know basis, and is limited according to the status and role of the registrar (regular registrar, special registrar, course co-ordinator, teacher, teacher-reviewer).

In addition, anyone having access to the application forms, registration forms and related documents signs a confidentiality agreement.

Preservation of personal information

The Foundation abides by the general rule not to keep information that has become outdated, obsolete or is no longer relevant.

Application forms

Record retention processes are designed so that personal information is kept no longer than necessary for the purposes set out herein, or to meet legal requirements.

Deletion of applications received

During the week following the end of a meditation course (that is, four to six months after the date that course applications were first accepted), the application forms are deleted (with one exception explained below), whether a student attended the course, cancelled in advance, or remained on the waiting list.

Certain applications held in reserve

The file of a course candidate, whose application is under review has begun on account of physical or mental health reasons, might be kept for a period of up to twelve months in one of the following situations:

- if the review of the application was discontinued by the applicant (cancelled or for lack of a response);
- if the applicant was asked to postpone its course to a later date; or
- if, for the moment, the applicant has not been accepted, but might be later;

in order to be able to resume the process when a new application is received.

Teachers' Notes

As explained in the International Privacy Policy, which is accessible as part of the online application process, the teachers can take and keep notes about students applying for, or participating in a course. The relevant passage reads:

"For the welfare of the students, the local or regional Vipassana organization may consider it necessary to take and retain notes on any health concern or behaviour in relation to the course that is inconsistent with the *Code of Discipline*, or that otherwise indicates that a student should be restricted from attending future courses, or will need additional support during a future course."

The applicant, by submitting an application form, has consented to this in advance. If the latter participates in a meditation course, he consents again by signing a form on the day of arrival at the Centre.

Consent to use e-mail address

The Centre's principal means of communicating with old students is by e-mail messages sent occasionally from a regional mailing list. To receive such messages, an old student must intentionally subscribe to the list, which is managed according to an "opt-in" mode compatible with Canadian anti-spam laws. A person who has subscribed in order to receive the Foundation's e-mail communications can unsubscribe at any time by clicking the unsubscribe link at the bottom of the e-mail.

Access to information

Subject to applicable laws, a person has the right to access their personal information over which the Foundation has custody and control, in order to update it or to correct inaccuracies. A person can request access to their personal informations, their update or the correction of its inaccuracies by sending an email to the Centre. To verify the identity of the person who is requesting access to personal information, the Centre may in turn ask for certain personal indentifiers.

How to contact us

If you have questions or comments about this protection of personal information policy, any policy regarding our Vipassana website, or their implementation, or if you wish to access personal information that we have collected about you, you can contact the Centre at privacy@suttama.dhamma.org.

Effective date

The Foundation's Personal Information Protection Policy has been in effect since December 5th, 2021. It is a local complement to the International <u>Privacy Policy</u>, which has existed since May 25, 2018.

The Eastern Canada Vipassana Foundation reserves the right to modify the terms of this local policy at any time, and at its sole discretion. At the top of this document, the date of the policy's latest update is indicated. We invite everyone to consult this document regularly to keep informed of potential changes. A person who registers for a Vipassana course accepts these policies as stated above.