

	Policy #ISP-13	
	Revised:	Reviewed:
	Date: November 24, 2022	Approved by: Board of Directors
	Distribution: Noojmowin Teg Health Centre Employees	
	Subject: Organization Online Properties	

Policy Statement

This policy explains how the Noojmowin Teg Health Centre (NTHC) collects, uses and discloses client information when clients use our website. The policy also explains how NTHC privacy commitments apply to our website operations.

Privacy Policy Commitments:

The only personal information that we collect from your visit is what you voluntarily provide to us for specific purposes. NTHC's website analytics only use non-identifiable data.

Data is not shared about client visit with third parties except to report malicious attacks or as required by law.

NTHC does not allow third parties to track clients.

Personal Information

The only personal information that is collected from client visit is what client voluntarily provide to NTHC for specific purposes, such as to ask questions, provide feedback, or subscribe to our communications should that feature be enabled.

Noojmowin Teg will only collect personal information that is necessary for the administration of a lawfully authorized purpose, in accordance with section 38(2) of the Freedom of Information and Protection of Privacy Act (FIPPA). At the time of collection, clients will be informed of the specific purpose for which it is being collected.

Information Collected

NTHC web servers will automatically record non-identifiable details about website visits and interactions. Web server log files that will be generated when visitors view our webpages. NTHC web servers will log the following data about client visit:

- Internet Protocol (IP) address. For analytics purposes
 - Device type
 - Operating system.
 - Browser type, and version.
 - Pages viewed on NTHC website and time spent on each page.
 - URL of the page that directed client to NTHC website, and in some instances, the search term(s) used to find NTHC.
 - Country (determined by IP address).

How We Use Data

NTHC website analytics will only use non-identifiable data. NTHC host our own web servers, and carry out all website operations in-house, including logging and analyzing transaction data from website visits (when available in the future).

NTHC will use server log data to:

- fix errors on our website;
- defend against malicious attacks;
- generate website usage statistics; and
- improve service delivery in general.

Cookies

A cookie is a small text file that a website creates and accesses through your browser when a client visit the site. Cookies are used for many purposes, such as to track language preferences, provide customized web page content, and display website navigation history.

Cookies used by the NTHC do not contain personally identifying information, do not give access to anything on personal devices. NTHC only uses “session” cookies that expire with each visit (unlike “permanent” cookies that can track visitors across multiple visits, websites, and time). NTHC session cookie contains a randomized number intended to help client browser’s interact better with dynamic content on NTHC site, and is not for tracking purposes. Should a client opt-out of our web analytics, a cookie will be set to recognize this preference. Data generated from NTHC cookies are not used to identify visitors, and are never shared with third parties.

Third Party Cookies

When visiting our site, your browser may receive longer-term “permanent” cookies from Google, a third party. Clients do not have to accept any cookies to access or search the NTHC website. However, there may be minimal loss of functionality if clients have disabled or deleted all cookies. Please consult your browser settings (and browser plugins) which allow you to configure whether and how to receive cookies.

Third Parties

NTHC will only collect and analyze website usage data strictly for internal purposes. NTHC will not sell, rent, exchange, or otherwise disclose any information that is collected about NTHC website visitors to third parties, except in the case of a malicious attack or as required by law.

Email Communications and Opt in/out

Any personal information that is provided to NTHC will only be used to respond to message and/or provide clients with the requested service or product. If clients do not wish to receive e-mail communications from the NTHC, clients will be able to unsubscribe at any point or e-mail at info@noojmowin-teg.ca

External Sites

If links are provided to external sites, NTHC is not responsible for the content and the privacy practices of sites other than our own. NTHC encourages clients to examine each site’s privacy policy and disclaimers and to make decisions regarding the accuracy, reliability and completeness of material and information found on external sites.

Noojmiwn Teg will use reasonable precautions to protect personal information in our possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

References

Information Privacy Commission of Ontario Information Management Policy 2022.