



POLICY: Digital Privacy Statement		POLICY NUMBER: GA-2
		PREVIOUS/REPLACES: Digital Privacy Statement
APPROVED BY: Executive Council	EFFECTIVE DATE AS OF: May 4, 2021	PRIOR VERSIONS: December 11, 2019

1. Policy Statement:

The Manitoba Institute of Trades and Technology (to be referred to as MITT) is committed to respecting and protecting the privacy of its online visitors. This includes whether you are browsing for information or conducting business with us electronically. This digital privacy statement explains why we collect personal information, the types of personal information we collect when you visit MITT online and how we use the information. All personal information you provide is managed in accordance with *The Freedom of Information and Protection of Privacy Act* (FIPPA) and *The Personal Health Information Act* (PHIA).

2. Scope:

This policy applies to all employees of MITT and any other person who provides goods or services to or on behalf of MITT that may have dealings with personal information in any manner.

3. Procedure:

3.1 Why we Collect Information

MITT's primary goal in collecting personal information is to provide a high-quality, modern, and constantly improving online experience to our users. We do this by analyzing a user's experience on our online platforms.

Some of the purposes for which MITT collects personal information are for the following:

- a. to facilitate communication with you;
- b. to initiate, complete, or respond to a request for information that you have submitted;
- c. to enable personalized experiences, communications, and messaging on our digital platforms;
- d. to enable website functionality that requires us to remember a selection, option, or user choice;
- e. to analyze the effectiveness of our digital presence.



3.2 Information Collected Through MITT's College Website

We do not automatically collect any individualized personal information from visitors to the MITT website. Personal information such as your name, telephone number, email address, or address will only be collected if you choose to provide it to us voluntarily such as when completing an application form on the website.

We do collect information about visitors to MITT's website for the purposes of analyzing trends, website traffic and statistics. This information is anonymous and is used on an aggregate basis.

3.3 Information We Collect Via Google Analytics (using cookies)

MITT uses Google Analytics to gather statistics on portions of its website. Google Analytics employs cookies, a digital marker to define user sessions. A cookie is a text file that is sent to your browser when you access a website. It enables the website to store information about activities on the website or the length of your stay. MITT will only use the collected data and cookies for aggregate statistical analysis related to browsing behavior. If you wish, you can set your web browser to notify you when you receive a cookie and may decide whether or not you want to accept it. Please refer to the "help" information in your browser software for information on how to disable or delete cookies from you device.

MITT also uses web beacons and pixel-tracking tools (Google Pixel, Facebook Pixel and StackAdapt Pixel) to collect anonymous and aggregate data.

The following types of information are collected via Google Analytics and are used on an aggregate basis:

- Hostname;
- Type of browser/operating system used to access website;
- Screen resolution of the monitor;
- Date and time website was accessed;
- Webpages visited;
- Address of any external website linked to through MITT's website;
- Search terms;
- Type of request;
- Cookie values;
- Language encoding;
- Demographics.

The information collected through analytics is used by MITT to improve our digital service to make our website mores useful to you by monitoring traffic patterns and type of technology used when accessing our sites.



3.4 Information Voluntarily Provided in Emails and Web Forms (including student registration)

MITT collects the personal information you provide to us when you submit a request, complete a form including student registration, or in any other manner that you may communicate with us online. In some instances, not including student registration, the information provided is managed through a database by third-party providers such as ChatBot and Hubspot. Users are encouraged to read through each site's privacy policy and disclaimers to make your own decisions regarding privacy of those sites.

MITT uses this type of information to respond to your request to help us get the information you need and in some cases it may also be used within MITT to improve customer service. Any personal information collected through the student registration process will only be used for the purposes it was collected and is subject to all relevant privacy laws and regulations.

3.5 Security

MITT endeavours to maintain appropriate procedural and technological measures to prevent any unauthorized use or disclosure of your personal information. For the on-line application process, MITT employs a SSL Certificate and secure https protocol. All documents collected as part of this process are encrypted and stored in a secure database.

MITT uses a firewall that controls access to and from the on-line application site from the external environment and logs all access attempts to the internal college site and identifies and blocks intrusion attempts.

We exercise care in the secure transmission of your information, however, no transmission of information over the internet is 100 per cent secure and we cannot guarantee that information disclosed through the internet won't be intercepted by third parties. However, MITT takes all reasonable precautions available to protect any personal information provided to it digitally including disposal or destruction of this information.

3.6 Third Party Websites

MITT's website may contain links to other websites. These links are provided as convenient information services only to help you locate other resources which may be of interest to you. MITT does not operate these websites and we are not responsible for the content and the privacy practices of other websites. We encourage you to examine each site's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

3.7 Disclosure of Information

Personal information is only shared when permitted by *The Freedom of Information and Protection of Privacy Act* (FIPPA) and *The Personal Health Information Act* (PHIA), with your consent, or in order to fulfill a request that you have made. MITT will never rent, sell, or trade your personal information to a third party.



In certain circumstances, MITT may disclose your personal information to a government institution that has the lawful authority to obtain the information or where we have reasonable grounds to believe the information could be used in the investigation of an unlawful activity.

3.8 Social Media

MITT's use of social media is an extension of our presence on the web. Social media accounts are public. Users are encouraged to read the terms of service and privacy policies of any social media sites they interact with. MITT uses Facebook, Twitter, Instagram, LinkedIn, and YouTube.

3.9 Getting More Information

For questions or comments regarding this policy, or for additional information on privacy issues contact the Senior Analyst, Policy & Performance, Access and Privacy Officer at tricia.chestnut@mitt.ca.

4. Administration:

The Senior Analyst, Policy & Performance, Access and Privacy Officer, is responsible for ensuring that this Policy is adhered to.

5. Review:

This policy will be reviewed by Executive Council every five years.

6. References:

Privacy and Access to Information Policy
The Freedom of Information and Protection of Privacy Act and Regulations
The Personal Health Information Act and Regulations