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## PRIVACY STATEMENT

Last Revised: October 16, 2024

Palette Skills, Inc. (“**Palette Skills**”, “**we**”, “**our**” or “**us**”) recognizes the importance of privacy. The purpose of this Privacy Statement is to inform our website visitors, participants and partners about our privacy practices, including how we collect, use, and disclose your personal information.

### What This Privacy Statement Covers

This Privacy Statement covers the following topics:

- [When this Privacy Statement Applies](#)
- [What is Personal Information?](#)
- [Personal Information We Collect](#)
- [How We Use Your Personal Information](#)
- [How We Share Your Personal Information](#)
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### When this Privacy Statement Applies

Palette Skills is a national nonprofit whose purpose is to connect Canada’s most innovative companies with the talent they need to grow. We work with employers,

training providers, and other organizations across the country to provide a national upskilling system that creates new career paths for job seekers to meet their full potential.

This Privacy Statement relates to all our activities, unless we have provided you with a separate privacy statement for a particular product, service or activity. This Privacy Statement applies:

- when you interact with our website, [paletteskills.org](http://paletteskills.org), and any other sites that we own or control (the “**Websites**”)
- when you use our online or offline service offerings, including our Upskill Canada Hub (“**UCH**”)
- when you otherwise interact with us, for example by contacting us or participating in our in-person events

## **What is Personal Information?**

“Personal information” means information about an identifiable individual as described under Canadian privacy laws.

Personal information does not include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, work fax number or work e-mail address.

## **Personal Information We Collect**

We may collect, use, and disclose different types of personal information, depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- **identity information**, such as your name, username or similar identifier, and date of birth
- **contact information**, such as your address, telephone number, and email address
- **employment information**, such as your resume, work experience, professional goals and interests, salary information, skills and abilities, workplace accommodation needs, educational background, and eligibility to work in Canada
- **program participation information**, such as your programs of interest, training goals, details about your participation and performance in our

education and training programs, details about your participation in our events, and your evaluations of our programs and services

- **demographic information**, such as your age, gender, race, ethnicity, sexual orientation, newcomer status, and disability status
- **images and recordings**, including photographs and audio and visual recordings of you participating in interviews with us or attending our events, webinars or online classes
- **technical and usage information** based on your use of our website and application portal, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website
- **marketing and communications information**, such as your preferences for receiving our newsletter

In most cases, we collect personal information directly from you, for example, when you register for the Upskill Canada Hub, participate in our programs, participate in surveys, interact with our staff members, or register for our newsletter. In some cases, we may collect personal information from third-party sources, such as from your previous or future employers, organizations that refer you to us, or from delivery partners whose programs we fund.

We also collect, use, and share aggregated and anonymized data for any purpose, including reporting on our activities to our delivery partners and funder and evaluating our marketing efforts. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

## **How We Use Your Personal Information**

We generally use your personal information for the following purposes:

- to evaluate an applicant's eligibility for a Palette program
- to administer Palette programs and initiatives
- to conduct research and analysis on, evaluate and enhance Palette programs and services
- to provide you with updates regarding programs, new services, invitations to events and for marketing and promotional purposes
- to improve, operate, and maintain our website and application portals

- to meet our legal, regulatory, or contractual requirements, such as providing information about program participation and outcomes to our funding partners
- to investigate legal claims and protect our rights, operations or property
- for such other purposes as you may consent to from time to time
- as otherwise required or permitted by law

## **How We Share Your Personal Information**

We generally identify to whom and for what purposes we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information. We may disclose your personal information to the following persons for the purposes described below:

- **delivery partners**, so they can provide you with training programs that are funded by Palette Skills;
- **network partners**, so they can provide you with additional services to support your upskilling journey
- **prospective employers**, to match you with appropriate career opportunities and facilitate your application for employment
- **career coaches**, so they can support you in your job search
- **external researchers**, who obtain research ethics board approval to study trends in the nature of work to support improvements to Palette Skills' programming and better understand the needs of our stakeholders (employers and participants).
- **government funding agencies**, so they can evaluate and providing funding for Palette Skills' services and programs
- **other third parties**, in the event of any significant business transaction, such as a merger or reorganization, or when we believe such disclosure is required or permitted by law

We rely on service providers to perform a variety of services on our behalf. Our service providers include billing and payment processors, technical support providers, data storage providers, e-commerce and customer engagement providers, marketing agencies, and translators. If we transfer your personal information to a service provider, we require that they maintain the confidentiality of your personal information and keep it secure. We also require

that our service providers comply with applicable privacy laws and only use your personal information for the limited purposes for which it is provided.

## **Your Consent**

We collect, use, and disclose your personal information with your consent or as permitted or required by law. How we obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the personal information in question. Generally, we will seek your consent at the time we collect your personal information, either orally, electronically, or in writing.

If you provide personal information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose their information as described in this Privacy Statement.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information below. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain products or services.

## **Our Use of Cookies**

When you use our website, we may use cookies and similar tracking technologies to automatically receive and record technical information on logs and databases from your browser, application, services or devices.

Information collected may include your IP address, location details, mobile device, operating system, the type of browser, demographic information, application and device you are using to access our website, click-through paths, the identity of the page or feature you are requesting or interacting with, time on page of feature, and other indicators of how you are interacting with our website. This information is used to optimize the users' experience by customizing our web page content based on the visitor's browser type and other information. We may also associate the information with you when we collect information from different devices, which helps us provide consistent services across devices.

We may also use information collected through cookies and similar tracking technologies to engage in interest-based advertising (also known as targeted or behavioral advertising) in connection with your use of our website, and across third-party websites or service offerings when you leave our website. Interest-based advertising means that your preferences and interests are collected through cookies or similar technologies and then used to provide you with advertising and marketing materials that are relevant to you, based on those preferences and interests. For example, we use Google Ads and Google's

DoubleClick to provide you with advertising based on your browsing history and search requests.

If you do not wish to accept cookies, you can adjust your web browser settings so that you automatically deny the storage of cookies or are informed each time a website requests to store a cookie. Previously stored cookies can also be deleted through your web browser. Please refer to your web browser's help pages for more information. Some areas or features of our website rely on cookies and may not work if you delete or decline cookies.

### **Google Analytics**

Our website utilize Google Analytics, a service from Google, Inc. ("Google") that uses cookies. The information collected by the cookies (which includes your IP address) is transferred to Google who stores and processes the information in the United States. Google uses the information to provide us with an analysis of your use of our website, overall use of and traffic on our website. You can opt out of Google Analytics by downloading and utilizing the Google Analytics Opt-out Browser Add-on. By using our website, you understand and acknowledge our use of Google Analytics.

### **Opting Out of Marketing Communications**

If you no longer want to receive marketing-related e-mails from us, you may opt out of receiving marketing-related e-mails by clicking the "unsubscribe" link at the bottom of any e-mail you receive from us. You may also opt out by contacting us directly using the contact information below.

Please note that if you opt out from receiving marketing-related e-mails, we may still need to send you communications about your use of our products or services, or other matters.

### **Retention, Storage, and International Transfer of Personal Information**

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and as permitted or required by law.

We and our service providers generally store your personal information on servers located in Canada. In some cases, we rely on service providers outside of Canada, including in the United States, to process and store personal information to fulfil the purpose for which we collected it. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country. For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information below.

## **Information Security**

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information from loss or theft, unauthorized access, use, or disclosure. For example:

- we train our employees and agents on the importance of safeguarding personal information
- we restrict access to your personal information to those employees or agents who need access for authorized purposes

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in risks such as phishing and identity theft. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

We may also require that you assist us in safeguarding your personal information. For example, if you create an account through our website or application portals, you should use a unique and strong password and not share your password with others.

If you have reason to believe that your personal information is no longer secure, please contact us immediately using the contact information below.

## **Accessing and Updating Your Personal Information**

We expect you to supply us with updates to your personal information when required. We will not routinely update your personal information unless such a process is necessary.

You may make a request to review any personal information about you that we have collected, used, or disclosed, and we will provide you with any such personal information to the extent required by applicable laws. You may also challenge the accuracy or completeness of your personal information in our records. If you demonstrate that your personal information in our records is inaccurate, incomplete or equivocal, we will amend or delete your personal information as required. Where appropriate, we will transmit the amended information to third parties to whom we have disclosed your personal information.

We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. Any such identifying information will be used only for this purpose. We will not charge you any fees to access your personal information in our records without first providing you with an estimate of the approximate fees, if any.

If you object to how we handle your request, you may have the right to make a complaint to the Privacy Commissioner of Canada or the applicable provincial privacy commissioner.

### **Third-Party Websites and Services**

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to purchase, subscribe to, or use other products or services from third parties with different privacy practices. Those other websites, products, or services are governed by the privacy statements and policies of the respective third party. This Privacy Statement does not extend to any websites, products, or services provided by third parties. We do not assume responsibility for the privacy practices of third parties, including our delivery partners and funder, and we encourage you to review all third-party privacy statements prior to using third-party websites, products, or services.

### **Changes to this Privacy Statement**

The Privacy Statement was last revised as of the date that appears at the top of this page. To review a summary of recent changes, [click here](#).

From time to time, we may make changes to this Privacy Statement. When changes are made, they will become immediately effective when published in a revised Privacy Statement posted on our website, unless otherwise noted. We may also communicate the changes to this Privacy Statement by other means.

### **How to Contact Us**

All comments, questions, concerns, or requests regarding your personal information or our privacy practices should be forwarded to our Privacy Officer at [privacy@paletteskills.org](mailto:privacy@paletteskills.org).