## Canadian Open Neuroscience Platform Policy on Protecting the Privacy of Portal Users ("Privacy Policy") (Last updated on 2021-01-20)

This Privacy Policy governs the collection, use, and disclosure of information generated during your visit to the Canadian Open Neuroscience Platform (CONP) Portal. The Portal is hosted by the McGill Centre for Integrative Neuroscience (MCIN), a unit within McGill University.

This Policy is separate from the Portal's Terms of Use, Data Contributor Agreement, or other CONP-related materials.

### Definitions

For the purposes of this Policy:

- "aggregate-level data" refers to data that have been grouped together to provide information at a broader level than the initial record-level data. These data do not allow for the identification of individual records. (Adopted from definitions by <u>Statistics Canada</u>, the <u>Canadian Institute for Health Information</u>, and the <u>Organisation for Economic Cooperation and Development</u>)
- "asset" refers to either a dataset, tool, or pipeline available through the <u>CONP Portal</u>.
- "CONP" refers to the <u>Canadian Open Neuroscience Platform</u>.
- "cookie" is a small electronic file temporarily stored on your computer that contains information about your visit to a website.
- "external website" refers to any website other than that accessible at <u>https://portal.conp.ca/</u>.
- "MCIN" refers to the <u>McGill Centre for Integrative Neuroscience</u>, which runs the CONP Portal.
- "personal information" refers to individually identifying information for which there is a reasonable likelihood of identification.
- "Portal" refers to the web interface for the CONP Portal, which is accessible at <u>https://portal.conp.ca/</u>.
- "public IP address" means a unique address that publicly identifies your connection on the Internet.

• "Terms of Use" refers to the user agreement that governs your use of the resources available on the CONP Portal. It is distinct from this Policy.

## **Consent Statement**

By visiting the Portal, you agree to the terms of this Policy. By your use of the Portal, you consent to the collection, use, and disclosure of your personal information in accordance with the terms contained in this Policy, which may be amended from time to time. You understand that it is your responsibility to verify any updates to this Policy.

### Collection of personal information

#### Information about your visits

The CONP uses the software <u>Matomo</u> to gather information about your visits. Thanks to Matomo, this information does not leave CONP servers, allowing the CONP to maintain control of these data. When you visit and use the Portal, our server automatically collects certain technical information pertaining to your visit and use of the Portal. These include:

- your public IP address and its approximate geolocation
- the domain name from which you visited the Portal
- user-specific information on which pages are visited
- aggregate information on pages visited
- the date and time of visit
- asset accessed on the Portal

We use this information to improve the Portal and for reporting purposes. We do not combine this information with that from other sources to identify individual users. This technical information is retained for up to 12 months before being aggregated.

#### User-submitted survey information

The CONP uses Google Forms to survey Portal users about their experiences using the Portal. This information is not automatically collected and any user information submitted via the Google Form is entirely of the user's choosing.

Where a Portal user chooses to submit feedback via Google Forms, the information is subject to Google's own Privacy Policy. See also the section "Links to External Websites" below.

#### Information sharing

The CONP publishes aggregate-level data about the use of the Portal both on the Portal website and in reports related to the CONP's activities.

The CONP does not share any personal information with other entities or organizations, except when legally required to do so, at the request of governmental authorities conducting an investigation, to verify or enforce compliance with the policies governing the Portal and applicable laws, or to protect against misuse or unauthorized use of the Portal.

Except as described above, we will not share any information with any party for any reason.

#### Cookies

We use cookies to:

- identify your visit to the Portal
- record your acceptance of the Terms of Use

As acceptance of the Terms of Use is a prerequisite to accessing the site, it is not possible to block this cookie and maintain site access.

# Disclosure of personal information

In so far as the information collected is considered personal information and within the custody of MCIN, it will not be shared with individuals and units outside of MCIN. We will not disclose personally identifiable information about your use of the site except under the following circumstances:

- with your prior explicit consent
- when we have given you clear notice that we will disclose information that you voluntarily provide
- with appropriate external parties, such as law enforcement agencies, in order to investigate and respond to suspected violations of law or university policy. Any such disclosures shall comply with all applicable laws and institutional policies. Only that information which is necessary for compliance purposes will be disclosed.

#### Security

Due to the rapidly evolving nature of information technologies, no transmission of information over the Internet can be guaranteed to be completely secure. While the CONP is committed to protecting user privacy, it cannot guarantee the security of any information users transmit to university sites, and users do so at their own risk.

MCIN staff, who run the CONP Portal, are subject to <u>McGill University's Policy on the Responsible</u> <u>Use of McGill Information Technology Resources</u>. Pursuant to this policy, we have appropriate organizational and technical security measures in place in our physical facilities to protect against the loss, misuse, or alteration of information that we have collected from you at our site. We furthermore use reasonable safeguards consistent with prevailing industry standards and proportionate to the sensitivity of the data being stored to maintain the security of that information on our systems.

#### Links to external websites

The Portal contains links to external websites. The CONP is not responsible for the availability, content, or privacy practices of external websites. These external websites have their own policies as it relates to the collection, use, and disclosure of personal information. We invite you to consult the privacy policies of these websites to know more.

#### Privacy notice changes

From time to time, we may use visitor information for new, unanticipated uses not previously disclosed in this Privacy Policy. In such cases, this Privacy Policy will be updated accordingly. If this is a concern, we encourage you to periodically check for changes.

## Questions about this Policy

Should you have any questions or concerns about this Privacy Policy, kindly send us an email at privacy@conp.ca