

CCDI Consulting Inc.

Consultation CCDI, Inc.

Data Privacy and Protection Charter

St. Thomas University

2023

We respect the privacy of our clients and request they do the same. This document is private and confidential and not to be shared with anyone external to your organization.

The intent of this Charter

CCDI Consulting considers privacy and the protection of data a top priority. We recognize that by collecting sensitive information, as the IDEA Meter™ does, we must be vigilant in the protection of that information.

The following outlines how the information received from the IDEA Meter™ users at your organization will be stored and protected, as well as the circumstances and format under which it will be shared and produced.

The provisions of this Charter relating to confidentiality shall survive any termination or expiry of the agreement between CCDI Consulting and your organization.

Where will the data be physically located? What measures are in place to ensure it's safe?

The data is stored on Microsoft Azure. This is a secure datacenter facility monitored by on-site security staff on a 24/7 basis.

The data location of the hosting server is in Canada and is owned by a 100% Canadian owned company. As such, it is subject only to Canadian law. Servers are firewalled and regularly updated with the latest security patches.

How is the information kept secure and confidential?

The data provided by users is protected and encrypted at all times. It is not visible to anyone from your organization, CCDI Consulting, its clients or vendors. No one from your organization, CCDI Consulting, its clients or vendors will be able to see/identify how a person responds to questions.

When data is transmitted by the user to the server, the data is transmitted in an encrypted form using a secure socket layer ("SSL") i.e. the website address starts with "*https://*" instead of "*http://*". This is the global standard for internet security. Data is never sent in plaintext. All web traffic is sent over Transport Layer Security (TLS) HSTS for privacy and security

Before being physically stored on the server, all explicitly private and sensitive data is always stored at rest in an encrypted format. The encryption will use at minimum AES with a 128-bit key and salt with a minimum length. When required, the data is decrypted by the application, specifically to generate data exports.

Furthermore, CCDI Consulting agrees to:

- >> Keep all your organization's information confidential and secure.
- >> Limit the disclosure of any of your organization's confidential information which includes all user/survey participant data to only those who have a need to know it for the purpose of providing the IDEA Meter™ and who have been specifically authorized to have such disclosure; and
- >> Not directly or indirectly disclose, destroy, exploit or use any of your organization's confidential information (except for the purpose of providing the IDEA Meter™, or except if required by order of a court or tribunal), without first obtaining: (i) the written consent of your organization and (ii) in respect of any of your organization's confidential information about any third-party, the written consent of such third-party.

Who can see how individual users respond to questions?

The only person who can see how a user (i.e. survey participant) responds is the user. At no time will any person from your organization, CCDI Consulting, or the clients and vendors of CCDI Consulting be able to see how any individual has responded to questions.

Who has access to the administrator function of the tool?

It is the responsibility of your organization to assign a “Client Administrator” to act on behalf of the organization. The authorized Client Administrator is the only person from the organization who has access to the administrative functions of the tool. The administrative functions include the following:

- >> Transfer the organization's confidential information (includes all user/survey participant data) that is required to run the survey. The data is transferred using “**secure client files**” feature that allows secure transfer of files.
- >> Monitor the completion percentage rate of the survey
- >> Run anonymized/aggregated data exports.

We have a detailed procedure in place for assigning client administrator access. There are multiple permissions available that can be assigned, per individual and according to their role.

Should the Client Administrator voluntarily or involuntarily depart your organization, your organization is responsible for informing CCDI Consulting of that departure, so the administrative function can be suspended, and a new administrator can be assigned.

How are data exports to my organization generated?

Automated data exports from CCDI Consulting to your organization are generated via the IDEA Meter™ by the Client Administrator and do not require or allow anyone from your organization, CCDI Consulting, or its vendors to view the data or individual responses. Automated data exports can be requested at any time by the Client Administrator and do not require the intervention of CCDI Consulting, or its vendors.

Note that automated data exports are different from the Insights Report, which is created by CCDI Consulting and focuses on analyzing significant trends from our organization's data. The Insights Report is a one-time standardized written report prepared by CCDI Consulting as part of the product offering and includes further analysis on the aggregated data.

How are sample sizes of less than 5 reported to my organization (small cell repression)?

In accordance with the requirements of privacy legislation, raw data cannot and will not be provided to your organization in any form other than aggregate (i.e. anonymous). Data exports from the IDEA Meter™ will only be provided to your organization in the aggregate, i.e. no individual will be identified in the data exports.

To further ensure the protection of personal information, all analysis of aggregate data has a baseline for reporting data; i.e. when the IDEA Meter™ generates data exports using multiple variables, a minimum of 5 users (sample size) from a specific group are required for data to show in the data exports. If the sample size is less than 5 users, the data will not be shown in data exports.

How is the data protected when it is being transferred from my organization to the system?

The information that is transferred between your organization and IDEA Meter™ is completely secure and not accessible by any outside party.

All transactions are conducted online, over a secure socket layer (“SSL”). To upload user data into the system, the Client Administrator is required to login to the system at <https://client.ideameter.com> (where “client” is a predetermined unique identifier). The user’s login is secure (a lock symbol will appear in the browser and the domain name will start “https://...”).

Will my organization be notified if CCDI Consulting suspects unauthorized access to the IDEA Meter™ respondent data?

CCDI Consulting will notify your organization within 72 hours upon becoming aware of, or suspecting, any loss, theft, damage or unauthorized or unlawful access to information received from the IDEA Meter™ users at your organization and will cooperate with your organization on steps to address these issues.

How can my organization confirm CCDI Consulting practices discussed in the Privacy Charter?

CCDI Consulting allows your organization to, at its own expense and in compliance with the CCDI Consulting Audit Control Policy, appoint a third-party auditor to inspect CCDI Consulting compliance with the Privacy Charter. This audit must take place during normal business hours and with sixty (60) days prior written notice, and will be restricted in scope, manner and duration to that which is reasonably necessary to achieve this purpose.

What other notification will CCDI Consulting provide to my organization regarding our IDEA Meter™ respondent data?

CCDI Consulting will notify your organization of:

- >> Enquiries received from an IDEA Meter™ user at your organization relating to, among other things, the individual's right to access.
- >> Complaints received by CCDI Consulting relating to your organization's IDEA Meter™ respondent data; and
- >> An order, demand, warrant or any other document purporting to compel the production of any of your organization's IDEA Meter™ respondent data.

Unless required otherwise by law, CCDI Consulting will promptly comply and fully co-operate with all instructions of your organization with respect to any action taken with respect to such enquiry, complaint, or order.

How long will my organization's data be retained?

Through the efforts of CCDI Consulting and our employer partners, a database of Canadian workplace demographics is being created. This aggregated data will help provide insights to employers and the public on the state of diversity in workplaces, education institutions and/or specific industries/sectors. To this end, aggregate level data collected through IDEA Meter™ will be maintained in perpetuity. For clarity, this data cannot be linked back to a specific individual.

Should CCDI Consulting cease operations, demographic data collected will be deleted.

Who 'owns' the data? What happens to it if my organization ends the agreement with CCDI Consulting?

While the agreement is in place between CCDI Consulting and your organization, aggregated data collected through the IDEA Meter™ 'belongs' to your organization. That is, during the tenure of the agreement, your organization has the ability, at any time, to generate aggregate data exports from the system.

When the contract ends, your organization will no longer be able to access aggregated data from the system. However, as noted previously, the data will remain within the IDEA Meter™ database.

Should you leave your organization - either voluntarily or involuntarily - your data will remain in the IDEA Meter™ database however it will no longer be linked to your organization. Therefore, it will not be included in any aggregate data exports for your organization.

Please contact ITSecurity@ccdiconsulting.ca with any questions you may have.

About CCDI Consulting Inc.

Since 2014, CCDI Consulting has supported Canadian employers facing inclusion, diversity, equity, and accessibility (IDEA) issues in the workplace. CCDI Consulting can help move an employer from beyond compliance requirements to provide solutions that create sustainable and measurable results.

CCDI Consulting is managed by professionals who have practical workplace diversity and inclusion experience in a variety of industries and sectors. It leverages its transformative methodology, utilizes data-powered inquiry, and employs a unique integrated organizational management approach to address workplace IDEA challenges.

CCDI Consulting is a six-time winner the of the HR Reporters People's Choice award for Diversity/Equity Consultant.



Contact us

Should you have questions about any CCDI Consulting Service offering, please contact:

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