

By accessing, reading and making use of this Website, you acknowledge and agree, on your own behalf and on that of any person or entity on whose behalf you may be acting, that you have received, understand and agree to be bound by this Privacy Policy and our Website Terms and Conditions and that you consent to any matter that requires your consent or approval as described in this Privacy Policy and the Website Terms and Conditions.

OPERATING ROOM NURSES ASSOCIATION OF CANADA

PRIVACY POLICY

Approved by the Board of Directors September 9th, 2025.

A. INTRODUCTION

About Operating Room Nurses Association of Canada

The Operating Room Nurses Association of Canada ("ORNAC", also "we," "us," or "our,") is a Canadian not-for-profit organization serving as the national voice for perioperative nurses across the country. Established in 1983, ORNAC is led by a dedicated volunteer board of directors committed to advancing excellence in the perioperative nursing profession. Our mission is to promote safe and effective patient care by supporting education for perioperative nurses and empowering them to perform at the highest standards through evidence-based practice.

Our Commitment

We are committed to protecting the privacy of members, employees, volunteers, visitors to our websites, listed here below (collectively the "Website") and other stakeholders (collectively, "you" or "your"). We are accountable and transparent in how we treat Personal Information. ORNAC does not sell, rent or trade its mailing lists or other Personal Information.

<https://ornac.ca>

<https://ornacjournal.ca>

<https://ornacmembers.ca>

<http://operatingroomnurse.ca>

What is Personal Information?

"Personal Information" means information about an identifiable individual, including any information about you or that can be used to identify you, directly or indirectly. For the purposes of this Privacy Policy, Personal Information means any information provided to or collected by ORNAC about an identifiable individual. We use your Personal Information in accordance with all applicable laws concerning the protection of Personal Information.

Scope of this Privacy Policy

This Privacy Policy applies to any Personal Information provided to or collected by ORNAC through our Website, by email, facsimile, postal mail, hand delivered, verbally or any other means.

Purpose of this Privacy Policy

The purpose of this Privacy Policy is to give you information about what Personal Information ORNAC collects, why we collect it and how we use it, as well as what happens if you choose not to disclose Personal Information to us. This Privacy Policy is based on the principles outlined in the Canadian Standards Association's Model Code for the Protection of Personal Information, set out in Schedule 1 of Canada's *Personal Information Protection and Electronic Documents Act*. We will only collect, use and disclose your personal information in accordance with this Privacy Policy. To the extent that it operates in Alberta, British Columbia and Quebec, ORNAC complies with the substantially similar provincial privacy legislation in force in those provinces. ORNAC is accountable for and transparent in how it treats Personal Information.

PLEASE READ THIS DOCUMENT CAREFULLY.

B. HOW ORNAC COLLECTS PERSONAL INFORMATION

Voluntary Collection of Personal Information:

ORNAC may collect Personal Information from individuals who provide it voluntarily, either through membership registration, the Website, at an ORNAC event, or provided to us through other means. Such Personal Information could include:

- **Direct interactions** – you may voluntarily provide us with Personal Information when you apply to work or volunteer for ORNAC; register for ORNAC membership; create an online member profile; register to attend an event or educational program; attend an ORNAC meeting; apply for a bursary or nominate someone for an award; request information to be sent to you; subscribe for our publications; respond to one of our direct mail or telemarketing campaigns; participate in one of our events; post comments on our Website; or voluntarily provide Personal Information to us face to face, over the telephone, by mail, by email, by text, through social media or through other means. To protect your privacy, you should not provide us with any Personal Information unless you choose to do so.
- **Automated interactions** – when you use our Website we may automatically collect technical data about your equipment and browsing history using cookies and similar technologies (see section E below for more information). ORNAC meetings are generally conducted via a virtual platform and are recorded for the purposes of transcription. All meeting attendees are advised by the platform that they are being recorded at the beginning of the meeting.
- **Third-party interactions** – we may collect Personal Information when you interact with our content on third-party sites or platforms, such as event management or conference registration platforms that we may use from time to time, Facebook, Instagram, X (Twitter), LinkedIn or YouTube. This may include data such as registration information, comments or feedback, “likes” or shares, profile data or the fact that you viewed or interacted with our content. We may receive Personal Information about you in the course of fundraising, data analysis or data management activities. We may receive Personal Information when you make a payment to us directly, such as through PayPal.

C. WHAT PERSONAL INFORMATION IS COLLECTED BY ORNAC

We may collect Personal Information from members, employees, volunteers and event participants.

The Personal Information we collect could include:

- Personal identifiers such as your name, date of birth or social insurance number.
- Dietary restrictions or accessibility needs where appropriate (e.g., when registering to participate in one of our events). We also keep a record of what you have told us about how you like to be contacted (e.g., emails only) and what you would like to receive.
- Contact information such as mailing address, telephone number and email address.
- Details about our contact with you through email, text message, postal mail, on the phone or in person.

- Insurance information and documents.
- Employment history and background checks for volunteers and employees, including results of police records checks.
- Employee records.
- Membership information including, but not limited to, email and mailing address, provincial registration number, place of work and role, employment status, retirement age/date (if applicable), telephone numbers, level of education.
- Website log files for recording and maintenance of data.
- Information about events you have participated in.
- Information about bursaries and awards you have been nominated for or won.
- Images, including photographs and videos from any livestreamed services, video conferencing and our video surveillance systems.
- Anything you post on our social media including photos, posts, videos and other content.
- Information about your device such as your IP address, location or provider and your usage information and browsing history, although you can browse privately so that we do not receive this information. (See section E below for more information).
- Information about your interactions with our content on third-party sites or platforms, such as Facebook, LinkedIn and Instagram.
- Communications such as letters, emails and digital communications that we send to you or that you send to us.
- Personal Information you give us that we did not request (such as Personal Information you voluntarily put into an email to us or in a comments box on our Website).

D. OUR GUIDING PRINCIPLES

1. Accountability:

ORNAC is responsible for Personal Information under our control. We have designated a Privacy Officer to be accountable for our compliance with these principles and to oversee questions relating to privacy and this Privacy Policy. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the Privacy Officer at:

Privacy Officer
PO Box 307, Bath, Ontario, K0H 1G0
privacy@ornac.ca

2. Identifying Purposes:

ORNAC identifies the purposes for which Personal Information is collected at or before the time the information is collected.

We use the Personal Information we collect to manage our operations and for various purposes associated with the programs and services we provide. We collect, use, and disclose Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances.

The main purposes for which we generally use Personal Information are:

- To manage, oversee and administer our operations.
- To improve the quality and efficiency of our operations.
- To receive, process, receipt and acknowledge payments.
- To organize and administer attendance at our events and conferences.
- To maintain accurate and updated membership lists.
- To verify membership and eligibility for various ORNAC awards and conferences, participation on committees and eligibility for contests
- To meet audit and payment needs.
- To determine your solicitation preferences and whether you have subscribed to or unsubscribed from any of our mailing lists or publications.
- To respond to requests for information.
- To track communications with you.
- To track event and conference registration information.
- To identify and authenticate you in our information system and network.
- To provide, administer and protect our Website, information system and network.
- For privacy and quality management audits and training.
- For data analysis, data management and research purposes.
- To protect our rights, property or safety or that of our employees, contractors, volunteers or any other person.
- To prevent and detect fraud and other crimes.
- For other purposes that we have told you about and for which you have given us your consent.
- To fulfill other purposes permitted or required by law.

We do not collect more Personal Information than we need to achieve these purposes. If we want to collect, use or disclose Personal Information for a different purpose, we will tell you what that purpose is in writing and obtain your consent, unless the law authorizes us to do so without consent. In Quebec, there are situations in which Personal Information can be used for certain secondary purposes without consent, provided that it has a direct and relevant connection with the purposes for which the information was collected.

3. Consent:

We only collect, use and disclose your Personal Information with your knowledge and consent. Your consent may be expressed orally, electronically or in writing or it may be implied. We are committed to obtaining meaningful consent and use clear explanations and plain language to make sure that our consent processes are understandable and user friendly.

Express consent means that a person has clearly and explicitly agreed to the collection, use or disclosure of their Personal Information. Express consent may be expressed orally, electronically or in writing. Implied consent means a situation in which, even though a person has not given express consent, we assume that they have consented to the collection, use or disclosure of their Personal Information based on what they do or do not do. For example, if you give us a document that contains your Personal Information so that we can process your application for membership, we can reasonably conclude that you consent to our collection and use of this Personal Information for that purpose.

You have the right at any time to withdraw or cancel your consent to the collection, use or disclosure of your Personal Information by contacting ORNAC's Privacy Officer, at privacy@ornac.ca. Withdrawals of consent only take effect from the date of cancellation. They cannot be retroactive. We will let you know if your withdrawal could have any consequences, such as being unable to obtain publications from us.

4. Limiting Collection:

ORNAC will only collect Personal Information for the purposes identified in this Privacy Policy. If we want to collect information for a different purpose, we will tell you what that purpose is in writing and obtain your consent.

We will not collect, use or disclose more Personal Information than is reasonably necessary to meet the identified purposes. We will limit our collection of Personal Information to that which is necessary for the purposes identified by ORNAC. We collect Personal Information only by fair and lawful means.

5. Limiting Use, Disclosure and Retention:

ORNAC will only use or disclose Personal Information for the purposes for which it was collected, unless we have your consent to use it for a different purpose or if we are required by law. If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and obtain your consent.

We keep Personal Information only as long as necessary to achieve the purposes for which it was collected although we may retain certain Personal Information indefinitely if we are required to do so by Canada Revenue Agency or by our insurers. If you have made a request to access Personal Information, we will keep that Personal Information for as long as is necessary to allow you to fully seek any remedies (exhaust any recourse) that you may have under federal and provincial legislation.

We do not disclose or share Personal Information more widely than is necessary to achieve the purposes for which it was collected.

We may share Personal Information in accordance with this Privacy Policy with the parties set out below for the following purposes:

- Other perioperative nurses' associations in Canadian provinces affiliated with ORNAC.
- Other organizations in connection with our events and activities, subject to agreements requiring them to follow appropriate privacy practices.
- Third-party service providers, such as those who provide us with IT and system administration services, data analytics services, Website management, credit card and payment processing services such as PayPal, e-commerce services, fundraising services, project, conference, and event management services, telemarketing services, social media services, direct mail services, database management services and after hours calls management services.
- Professional advisors, such as lawyers, auditors, bankers and insurers who provide us with legal, accounting, auditing, banking and insurance services.
- Government, regulatory authorities, law enforcement, dispute resolution bodies, courts and similar entities to comply with any legal or regulatory obligation, to detect and prevent crimes or to assert or defend legal rights and interests.
- Any persons or entities where we have a legitimate business reason for doing so, such as to manage risk, to process payments to you or to someone on your behalf or to perform or carry out the terms of any contract between us subject to requirements to follow appropriate privacy practices.
- To the transferee if we transfer, sell or dispose of all or substantially all of our assets or operations.
- To anyone we reasonably believe is your agent.
- To other third parties if we have told you about them and you have given us your consent.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements. Our third-party service providers are required to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions and all applicable legal requirements.

6. Accuracy:

ORNAC has adequate processes and safeguards in place to keep Personal Information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. We will not routinely update Personal Information, unless such a process is necessary to fulfil the purposes for which the Personal Information was collected. ORNAC members are responsible for updating their ORNAC profile to ensure all their information is accurate. To change or modify any Personal Information previously provided to ORNAC, contact the Privacy Officer at privacy@ornac.ca.

7. Safeguards:

We will take reasonable steps to keep Personal Information in both paper and electronic format protected against loss, theft, snooping, data scraping, hacking or people collecting, disclosing, copying, using or changing it without authorization. We use security safeguards appropriate to the sensitivity of the information. Our methods of protection include:

- Physical measures — such as areas of restricted access and locked filing cabinets.
- Organizational measures — such as security policies and procedures, employee training on privacy issues, security clearances and limiting access on a "need-to-know" basis.
- Technological measures — such as passwords and encryption to protect the Personal Information in ORNAC's custody from hackers and malicious intruders.
- ORNAC aims to inform all employees, volunteers as well as third-party service providers of the importance of maintaining the privacy and security of Personal Information. We require all third-party service providers to enter into contractual agreements that require them to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements.

While we are committed to protecting your Personal Information, our security practices and technology measures cannot guarantee absolute security of Personal Information and we cannot ensure or warrant the security of any information you provide to us. You can reduce risk to your own Personal Information by using strong passwords, keeping your passwords confidential and following other Personal Information security best practices.

Third-party Processors

We use PayPal to process payment data.

You can access more information about PayPal's security standards at <https://www.paypal.com/ca/business/security/pci-compliance>.

You can read PayPal's privacy policy at <https://www.paypal.com/webapps/mpp/ua/privacy-full>.

8. Openness:

ORNAC will make available to individuals specific information about our policies and practices relating to the management of Personal Information, including by posting this Privacy Policy on our Website. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the Privacy Officer at privacy@ornac.ca.

9. Individual Access:

If you make a request to the Privacy Officer, we will inform you of the existence, use, and disclosure of your Personal Information and we will give you access to your Personal Information, if we have collected any. We will respond to your request within the time periods provided for under applicable laws.

10. Challenging Compliance:

You can challenge the accuracy and completeness of the Personal Information and have it changed or corrected as appropriate if there is an error or omission by contacting the Privacy Officer. We will respond to your request within the time periods provided for under applicable laws. If we identify a gap in compliance, we will take appropriate steps to remedy the situation, including changing our policies and practices if necessary.

E. INFORMATION COLLECTED THROUGH TECHNOLOGY AND SOCIAL MEDIA

A cookie is a small text file that is placed on your device when you visit a website and can last either for the duration of your visit (a “session cookie”) or for repeat visits (a “persistent cookie”). We use the word “cookie” in this Privacy Policy to refer to all files that collect information in this manner.

We only use cookies that are strictly necessary for the operation and functioning of our Website. Some of the cookies we use may be necessary for security purposes, to authenticate you and enable you to use our Website. Other cookies may not be essential but may make it easier for you to use the Website (such as by identifying you, remembering your preferences and helping you navigate the Website). We do not use cookies to help us analyze the use and performance of the Website or for advertising or tracking purposes.

Our cookies may collect the following types of information:

- your IP address;
- your approximate geographic location;
- the type of operating system you are using (eg Windows or Mac);
- the type of device you are using;
- the type of browser you are using;
- the domain name from which you reached our Website;
- which pages you visit on our Website;
- the frequency, date and time of your visits to our Website.

All major browsers allow you to disable cookies. You can disable cookies by changing the setting of your Internet browser. If you disable cookies, you may be unable to use or access some features on our Website.

F. LINKS TO THIRD PARTY WEBSITES

Our Website may provide links to third-party websites. Clicking on those links may allow third parties to collect or share information about you. We cannot control these third-party websites and we are not responsible for the actions or policies of such third parties. You should check the privacy policies of third parties when visiting their website or when providing any Personal Information to them.

We may collect Personal Information when you interact with our content on third-party sites or platforms, such as Facebook, LinkedIn, Instagram or YouTube. This may include data such as registration

information, comments or feedback, "likes" or shares, profile data or the fact that you viewed or interacted with our content. If you voluntarily post or submit any information on these platforms, your Personal Information may be automatically included in the posting and may be collected and used by others.

We use PayPal as our payment process provider and provide links to their website. You can read PayPal's privacy policy at <https://www.paypal.com/webapps/mpp/ua/privacy-full>.

To protect your privacy, you should be careful about providing Personal Information to any third-party site including social media sites.

G. PROTECTING THE PRIVACY OF CHILDREN AND YOUTH

We understand that Personal Information relating to children and youth is particularly sensitive, especially the younger they are. Consistent with the position of the Office of the Privacy Commissioner of Canada, we will not knowingly collect Personal Information from children under the age of 13 unless we have the consent of their parents or guardians. We collect the minimum amount of Personal Information of children and youth necessary to achieve our purposes.

If you are a child or youth, YOU SHOULD REVIEW THIS PRIVACY POLICY WITH YOUR PARENTS OR GUARDIANS to make sure that you understand and consent to everything in it. IF YOU ARE UNDER THE AGE OF 13, you should not access our Website or provide us with any Personal Information unless your parent or guardian has consented. If we discover that we have collected Personal Information from a child under the AGE OF 13 without parental consent, we will delete that Personal Information.

H. COMPLIANCE WITH CANADA'S ANTI-SPAM LEGISLATION

ORNAC complies with the requirements of Canada's Anti-Spam Legislation ("CASL"), as amended from time to time at all times, including when: sending emails or texts from an ORNAC account, email address or domain name, obtaining consent from recipients to send emails or texts, managing and responding to requests to unsubscribe and documenting and retaining records of consent. ORNAC does not send commercial electronic messages ("CEMs") to any person unless it has express or implied consent from the recipient, the CEM includes identification and contact information for the sender and the CEM has an unsubscribe mechanism. To ensure compliance with CASL, ORNAC has written policies and procedures, updates its volunteers and staff regarding CASL requirements and keeps records of consents and requests to unsubscribe (*Currently in Progress- September 2025*). Complaints regarding the sending of CEMs and requests to unsubscribe from CEMs should be directed to the Privacy Officer at privacy@ornac.ca.

I. OTHER JURISDICTIONS

Some or all of the Personal Information we collect may be transferred to third-party service providers in the course of our normal operations or activities including, without limitation, being stored on servers in cloud-based environments or transferred through other technological measures to trusted third parties to assist us in serving you. Some of our service providers are located outside of Canada and therefore Personal Information may be stored or processed in jurisdictions outside of Canada. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

ORNAC is not established in the European Union or any other jurisdiction that, either now or in the future, enacts data privacy laws that operate beyond the limits of the enacting state ("Enacting Jurisdictions"). ORNAC does not offer services to individuals in the Enacting Jurisdictions and does not knowingly monitor

the behaviour of individuals in the Enacting Jurisdictions. ORNAC does not knowingly collect or process Personal Information from individuals located in the Enacting Jurisdictions. Individuals located in the Enacting Jurisdictions should not access our Website or provide us with any Personal Information. If you have any questions or concerns about our privacy practices or procedures in relation to other jurisdictions, please contact the Privacy Officer at the coordinates provided above.

J. CHANGES TO PRIVACY POLICY

We may make changes to this Privacy Policy from time to time, such as in response to developments and changes in privacy law or to reflect technological changes or new functionalities. When we post changes to this Privacy Policy on our Website, we will change the “last updated” date at the top of this Privacy Policy. If possible, we will post notices of significant changes before they take place. Your continued use of the Website after any changes are made signifies your agreement with the terms of the revised Privacy Policy. Please refer to the latest update date noted above to know when we last updated this Privacy Policy.