

First Exposure Privacy Policy

1. Scope and Acceptance of the Policy

All individuals, without exception, who access, interact, or collaborate with the First Exposure platform fall under the ambit of this policy. Whether you're a regular user, a healthcare professional, or a media representative, your engagement with our website www.firstexposure.ca and any other affiliated platforms are governed by these terms.

2. Data Collection Principles

Minimized Data Collection: Our platform operates on the tenet of minimalistic data collection. For instance, media personnel interactions necessitate the collection of basic identifiers such as first name, last name, email, and organization.

Voluntary Communication: While our platform is designed to deliver without excessive data dependencies, users may choose to reach out via our designated communication channels, especially email, for enhanced assistance.

Google Analytics: We use this service to monitor and analyze web traffic. All data accessed is anonymized, with Google ensuring no personal user data is identifiable, making us compliant with international data protection stipulations.

3. Data Storage & Protection

Our commitment to safeguarding your data is unyielding. We employ state-of-the-art encryption techniques complemented by stringent firewalls, ensuring data remains fortified against unauthorized access or breaches. Regular audits and assessments further bolster our data protection measures.

4. Data Use and Sharing

User Data Sanctity: First Exposure stands firmly against any commodification of user data. You'll never find us engaged in activities that sell, trade, or barter your information unless ordered by a court of law.

Disciplined Data Sharing: We limit our data-sharing engagements to situations imperative for service facilitation. Any third-party collaboration is stringently vetted and bound by legal agreements to uphold our data protection standards.

5. Data Retention

Your data's tenure on our servers is strictly bound by its utility. Post its utility phase, or as mandated by applicable laws, we ensure it's methodically and securely deleted.

6. User Rights & Transparency

Unfettered Access: Every user can demand insights into their data that First Exposure retains.

Rectification & Removal: An inherent user right, you can command rectifications to your data or its complete removal.

Periodic Communication: In the event of significant changes or updates that might affect you, we pledge transparent, timely communication.

7. Cookies and Tracking Technologies

Definition: Cookies are small packets of data stored on a user's device when they visit a website. First Exposure utilizes cookies to enhance the user experience and track site interactions.

Purpose: We use cookies mainly for analytics and optimization. They help us understand how users navigate our platform, enabling us to refine and improve their experience.

Control: Users have the option to disable or manage cookies through their browser settings. However, some website features may not function as intended without cookies.

8. Third-Party Service Providers

Purpose: At times, First Exposure collaborates with third-party service providers to augment our services. These entities may have access to some user data, but strictly for service enhancement and delivery purposes.

Due Diligence: All third-party providers are subjected to a stringent vetting process, ensuring their privacy protocols align with ours and they adhere to PIPEDA and other relevant Canadian laws.

9. Data Retention

Duration: First Exposure retains anonymized user data for 14 months and event-related data for 24 months as long as is strictly necessary to fulfill the purposes for which it was collected or to meet legal requirements.

Archival: Some non-personal data may be archived for research, historical, or statistical purposes. This data is anonymized and stripped of identifiers.

10. Breach Protocol

Commitment: In the unlikely event of a data breach, First Exposure is committed to informing affected users promptly and transparently.

Steps Taken: If a breach occurs, our dedicated IT team will act swiftly to address and mitigate the issue. Concurrently, our PR team will handle communication, ensuring users are informed and advised on any necessary actions.

Legal Adherence: Any breach will be reported to the appropriate regulatory bodies as stipulated by PIPEDA and other provincial laws.

11. Feedback and Complaints

Open Door Policy: We encourage feedback and are open to addressing any concerns users may have about their data.

Resolution: Any complaints will be taken seriously, with a dedicated team working on resolving them in line with our commitment to transparency and user trust.

External Bodies: Users have the right to escalate their concerns to data protection regulators if they feel their issues are not resolved satisfactorily.

12. Legal & Compliance Adherence

First Exposure respects and adheres to international data protection regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada and applicable US data protection laws.

Vendor Vetting Process: Our external collaborations are governed by a stringent vetting process, ensuring all third-party entities resonate with our security and privacy principles.

Continual Training: Realizing the dynamic nature of cybersecurity threats, our staff undergo continual training sessions ensuring they are adept at handling data responsibly and securely.

13. Exclusivity in Data Access

Rest assured, your data is sacrosanct. Beyond the approved personnel of Dalla Lana School of Public Health, its sanctioned subcontractors, and the recognized project partners like Health Nexus and the University of Toronto, no external entity gains access to the data you entrust us with.

14. Grievance Redressal

Your concerns are our priority. Should you feel the need to discuss, redress, or understand any aspect of this policy or our practices, our dedicated grievance team is at your service.

15. Policy Updates & Review

Annual Review: First Exposure's privacy policy undergoes a quarterly review to ensure it remains relevant and up-to-date with evolving laws and best practices.

User Notification: Should significant changes be made, users will be notified either through email or prominent notifications on the platform.

Contact & Communication

Queries, concerns, or feedback? Contact us at privacy@firstexposure.ca. Our commitment is to ensure you remain informed, protected, and valued.

Conclusion

In entrusting First Exposure with your data, you put faith in our capabilities. This policy is our pledge, assuring you that your faith isn't misplaced. We value your trust and promise to uphold it with unwavering commitment.

Your use of the Website indicates your agreement to be bound by this Privacy Policy.

Policy Name	Version	Effective Date	Contact
First Exposure Privacy Policy	1.0	November 16 th , 2023	Freedom of Information Liasion at University of Toronto. privacy@firstexposure.ca