

PRA Inc. Privacy Policy

PRA Inc. is committed to maintaining the accuracy, confidentiality, and security of your personal information as required by Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA). This Privacy Policy describes the personal information that PRA collects from or about you when you participate in our research through a survey or interview. It explains why the information is collected and how we use and disclose the information. In addition, it tells you how to inquire about this Privacy Policy or about how your personal information is handled.

What is personal information?

For the purposes of this Privacy Policy, personal information is any information that is identifiable with you and does not include anonymous or non-personal information (i.e., information that cannot be associated with or traced back to a specific individual). Personal information also does not include your name, business title, or business contact information when used or disclosed for the purpose of business communications. However, if you participate in our research in your capacity as an employee of an organization, your responses will be treated as personal information.

Why does PRA collect personal information?

The personal information collected by PRA is used for our business purposes, including market research, socio-economic research, statistical analysis, and program evaluation. As a research firm, PRA is not in the business of collecting, using, or disclosing personal information to its clients. Instead, PRA collects information and reports to our clients in aggregate (combined) form. Information that is identifiable with an individual is not provided to our clients without the individual's prior consent.

What personal information is collected by PRA?

PRA collects personal information necessary only for the purposes identified to you.

How does PRA collect your personal information?

PRA collects your personal information by fair and lawful means. We collect your personal information where we have obtained your consent to do so or as otherwise permitted by law.

When do you consent to the collection of your personal information?

To make your consent meaningful, PRA will ensure that you are informed of the purposes for which the personal information is collected, used, or disclosed. You will be informed of the purposes either verbally or in writing. When your consent is required by law, you may withdraw your consent at any time.

The form and manner of obtaining consent may vary from express written or oral consent to implied consent, depending on the circumstances and the type of information. For example, if you decide to participate in a survey or interview, you are consenting to our use of your personal information for the purposes that have been described to you. In determining the form and manner of consent, PRA will take into account the sensitivity of the information. For example, where personal information will be given directly to a client, PRA will inform you of that fact and will only share your personal information with the client if you give your express written or oral consent.

In most circumstances, PRA will obtain your consent before the collection, use, or disclosure of personal information. PRA collects, uses, or discloses personal information without consent only where permitted or required by law.

How is your personal information used?

Your personal information is used only for the purpose for which it was collected. If previously collected information is to be used for an additional purpose, this purpose will be disclosed to you and your consent will be obtained where your consent is required by law. This consent will be obtained before the use of the information for the new purpose.

When is your personal information disclosed to others?

In most instances, PRA gives clients only aggregate information by combining your information with that of others who participated in the research so that your information cannot be identified with you. In some circumstances, PRA provides individual-level information to clients but with personal identifiers removed so that your information cannot be identified with you. In the few instances where PRA gives clients personal information that is identifiable with you, PRA will inform you of this (orally or in writing) before the collection, use, or disclosure of the information, and your express consent is required (orally or in writing) except where consent is not required by law.

To whom does PRA disclose your personal information?

In most cases, when we identify the purpose for collecting the personal information, the sponsor of the research will be disclosed to you. However, in some circumstances, the identity of the sponsor can only be disclosed at the end of the survey or interview or cannot be disclosed at all. You always have the option of deciding not to participate in the survey or interview.

In some instances, PRA may disclose your personal information to other parties engaged by PRA to perform functions on its behalf. PRA requires the other parties to review this Privacy Policy and contractually agree to comply with its terms and intent and all requirements of PIPEDA.

How does PRA protect your personal information?

PRA maintains physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification, or disclosure. For example, highly sensitive information is typically stored in locked cabinets with access limited to those persons who legitimately require the information. The use of passwords, appropriate levels of security, and encryption of files protect electronic files, and access to certain information is restricted to employees with an appropriate security clearance.

How long is your personal information kept by PRA?

In accordance with applicable law or regulatory requirements and PRA's document and data retention policies, we retain your personal information for only as long as we believe necessary to fulfil the purposes for which the personal information was collected (including for the purpose of meeting any legal, accounting, or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with you or traced back to you.

Updating your personal information

PRA does not maintain personal information that would require updating as no decisions are made about you on the basis of the personal information that you provide to PRA.

Accessing your personal information

The personal information that is collected by PRA is used for market research, socio-economic research, statistical analysis, and program evaluation. As stated above, no decisions are made about you on the basis of the personal information you provide to PRA. In general, the information PRA collects is not linked to a specific individual. In the few instances in which it is, if you wish to have access to your personal information, PRA will provide you with the information that we have about you when you make a written request to the Privacy Officer.

When requesting access to your personal information, please note that we may request specific information about you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you.

Your right to access the personal information that we hold about you is not absolute. There are circumstances in which applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased, or made anonymous in accordance with PRA's document management and retention policy.

In the event that we cannot provide you with access to your personal information, we will advise you of the reason, subject to any legal or regulatory restrictions.

Inquiries or concerns?

If you have any questions about this Privacy Policy or concerns about how your personal information is handled, please send a written inquiry or complaint to the attention of:

**Privacy Officer
PRA Inc.
500-363 Broadway
Winnipeg, MB R3C 3N9**

The Privacy Officer will assist you and advise you of any actions taken to address the issues or concerns you have raised. He will respond to your written requests not later than 30 days after their receipt.

Revisions to this Privacy Policy

PRA reserves the right to modify the terms and conditions of this Privacy Policy at any time, and such modifications shall be effective immediately, unless otherwise provided.

Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by the Privacy Officer. The Privacy Policy includes examples but is not intended to be restricted to such examples in its application. Therefore, where the word “including” is used, it shall mean “including without limitation.”

This Privacy Policy does not create or confer upon any individual any rights or impose upon PRA any rights or obligations except those imposed by Canada's federal or provincial privacy laws, as applicable. In its application, the Privacy Policy shall be interpreted to give effect to and comply with applicable federal or provincial laws.

Date last updated: November 16, 2021