



PRIVACY POLICY



About Integrity Advocate

Integrity Advocate Inc. (“Integrity Advocate”) maintains its values on the foundation of end-user privacy. Integrity Advocate is committed to the understanding, adherence of and maintenance of this policy. Please review the subjects contained within for a complete understanding of how we treat the data that users have entrusted us with. This is a statement of the privacy practices applicable to Integrity Advocate, describing how we collect, use, retain, delete and disclose our users’ personal information.

PRIVACY OVERVIEW

This privacy policy outlines users can expect us to do with the personal information that we receive as part of the services provided. The type of data we store and duration of storage depends on the user’s relationship with us, and the terms of our agreement.

In this document we clearly state:

- Why personal data is received;
- What we do with it;
- How we acquired it;
- Duration of storage;
- Who can see it;
- Where it is stored.

YOUR DATA PROTECTION RIGHTS

Under data protection laws, all users have rights. The rights available to Integrity Advocate users depends on our reason for processing information.

- **Right of access:** Users have the right to ask Integrity Advocate for copies of personal information. This right always applies.
- **Right to rectification:** Users have the right to ask Integrity Advocate to rectify information which may be inaccurate or incomplete. This right always applies.
- **Right to erasure:** Users have the right to ask Integrity Advocate to erase/anonymize your personal information in certain circumstances.
- **Right to restriction of processing:** Users have the right to ask Integrity Advocate to restrict the processing of information in certain circumstances.

Users are not required to pay any charge for exercising rights and Integrity Advocates commits to respond to all such requests within one month.

WHAT IS COLLECTED, AND HOW?

Integrity Advocate was developed with the philosophy that only the bare minimum of personal data should be collected, shared or stored and done so with total transparency to the end-user. Influenced by the principles of Privacy by Design, we take into account participant privacy throughout the entire engineering process. The information collected by Integrity Advocate is limited to the information that is reasonably necessary to fulfill the purpose of ensuring integrity of online interactions or as otherwise required or permitted by law. The organization delivering an online course/exam may provide Integrity Advocate with the first and last names of the enrolled users to aid in verification activities and emails for notification purposes.

While using Integrity Advocate's services, it may be deemed necessary for users to provide a limited amount of personally identifiable information that can be used to confirm identity. Names, emails and media provided and/or collected as part of the Integrity Advocate ID verification and monitoring process are used ONLY to identify individuals or to confirm adherence to session rules. The media shared will be restricted to a still image (or images) of the participant, to substantiate a violation of session rules. End-users participating in online events, and using Integrity Advocate, authorize access to their camera/audio feeds, on-screen activity and device information only while in-session and only for the extent necessary to validate their identity and participation. This collection is only done with participant consent and after they have had the opportunity to review, and acknowledged their review of our Privacy Statement and/or the associated Privacy Policy.

HOW DO WE GET INFORMATION?

Most of the personal information received is provided by the participant through the use of Integrity Advocate's identity verification, participation monitoring or proctoring services. Details specific to each data type can be found below in the Personal Data Reference Table.

WHY IS THIS DATA COLLECTED?

Integrity Advocate will only process the information that is necessary for confirming end-user identity and verification of compliance as it applies to the participation standards set forth by the online education provider(s). Any and all information will only be collected knowingly by, and with the expressed consent of, the end-user. The participant's image is compared against photo issued government ID and their media feed throughout the course of the learning event. The participant's name and email, as provided by the course/exam provider or their agent, is used to compared against the name displayed on their government issued photo ID and to notify the participant of the results. Without information, such as accepted identification, name, face and email we cannot provide the services necessary for the completion of an accurately proctored result.

DATA RETENTION

Data is kept for no longer than necessary for the purpose(s) it was collected. Data is programmatically deleted based on the time elapsed since collection and subject to specific to the necessity of retention. Details specific to each data type can be found below in the Personal Data Reference Table.

PERSONAL DATA REFERENCE TABLE

POSSIBLE INFORMATION COLLECTED (DEPENDENT ON SESSION RULES)	WHY IT IS COLLECTED	TIME STORED	SHARED THROUGH LMS/API
Student or government issued photo ID with user photo, expiry date and first / last name visible (additional information can be obscured by user).	For comparison against the user image and provided Participant name to confirm identity.	24 hours after completed session review.	No
Image (selfie) of participants face.	For comparison against the user image to confirm identity and retained to negate the need for providing ID on subsequent sessions.	2 years after completed session review.	Yes Only with course/exam provider or their agent.
First/Last name as provided to the integrated application i.e. Learning Management System.	For comparison against the name on the participant's ID to confirm identity and retained to negate the need for providing ID on subsequent sessions.	2 years after completed session review.	YES Only with course/exam provider or their agent.
User email as provided to the integrated application i.e. Learning Management System.	To notify the user of session results and to facilitate resubmission of ID (if required).	24 hours after completed session review.	No
Video feed capturing user participation throughout event.	To verify user participation against session standards.	24 hours after completed session review.	YES* Only the minimum number of still frames required to support violations are shared.
User device information (browser type, device type Desktop image).	To assist in customer support, trouble shooting and establishing monitoring environment.	Anonymized after 2 years.	No

* Integrity Advocate session reviewers take additional steps to amend the images shared by obscuring parts of the media shared if the image may provide additional personal information not relevant to the reason the information was provided (see Inadvertently Provided Personal Data).

INADVERTENTLY PROVIDED PERSONAL DATA

Because of the risk of users inadvertently providing personal information inadvertently when participating in the services provided by Integrity Advocate the following table has been created to create awareness and it clear to users and clients that none of this information is collected as a data point specific to the user and the efforts taken, to removed and/or obscured the information, for the protection of the user.

INADVERTENTLY DISCLOSED INFORMATION CATAGORIES	HOW IT MAY BE DISCLOSED	INADVERTANT INFOMANTION REQUIRING PROTECTION	IMPLEMENTED CONTROL
Physical / medical information.	Photo ID.	Height, weight, age, gender and race, date of birth, gender and/or specific medical conditions.	Restrict access/delete/obscure
Geographical information.	Government ID (when not obscured).	Home address, citizenship.	Restrict access/delete/obscure
Socioeconomic information.	Camera feed.	Partner / children images, ages etc., economic status from on screen visibility of home, appliances and/or electronics.	Restrict access/delete/obscure
Group affiliations.	Camera feed.	Religion and political affiliations (through dress, displayed religious/political symbols) or employment.	Restrict access/delete/obscure

SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

Integrity Advocate shares limited personal information as part of the service we provide. Where an online course/exam provider or their agent is responsible for maintaining compliance of testing standards, limited information received by Integrity Advocate may be accessed/used by these parties. This is solely as the basis for a more involved review to determine the circumstances relating to any rule violation(s) and to determine an appropriate remedy. The organizational purpose of Integrity Advocate is to implement technologies that work towards the elimination of the need to collect personal and private information.

Users have the right to know that their personal information;

- will never be sold or willingly released to third parties who would stand to financially gain from it.
- is not shared with third parties for the purposes of direct marketing.
- may be shared where legally obliged to do so. For example, if required under a court order, where legally compelled by regulation or to aid users in their effort to comply with regulations.

Details specific to data access relating to each data type can be found below in the Personal Data Reference Table.

DATA STORAGE

Integrity Advocate offers its services globally. Personal information may leave the geographic location of the end-user and reside on servers located in Canada (where directed/required by a client and/or regulation United Kingdom user data will be retained solely within servers in the United Kingdom). Canada is a data zone recognized by the European Commission as providing adequate protection. At no time is data stored on servers within the United States of America and subject to the Patriot Act. Regardless of where it is stored, how personal information is handled does not change. For additional information, please refer to Integrity Advocate's Security Policy (IA-POL-006 - Security Standard), available upon request to all impacted parties.

AUTOMATED DECISION-MAKING

Integrity Advocates use of artificial intelligence in its identity verification and participation monitoring processes is not used in a manner that would constitute automated decision-making. In all cases the artificial intelligence is used to augment and bring attention to information/findings that are then reviewed and adjudicated by a human reviewer. Integrity Advocate experience is that artificial intelligence lacks the necessary discretion to provide a reliable service and that human reviews without the benefit of artificial intelligence are prone to significantly more human errors.

DATA PROTECTION OFFICER'S CONTACT DETAILS

Our Data Protection Officer (DPO) is here to address the rights of users to access, remove, restrict, rectify and port their personal data. Please send any requests, questions or concerns regarding the IA Privacy Policy to: standards@integrityadvocate.com or via our postal address. Please mark the envelope 'Data Protection Officer'.

Integrity Advocate Inc is the controller for the personal information we process, unless otherwise stated. Our postal address is:

13A Perron Street, St Albert, Alberta, Canada, T8N 1N2.

Our DPO plays a key role in ensuring our accountability, but is not solely responsible for data privacy - this is an organizational accountability. Our Head of Data Security sits separately but works closely with our DPO. Work to ensure our internal data protection compliance, including completion of Data Protection Impact Assessments, is carried out jointly.

CHILDREN'S INFORMATION

We do not provide services involving children under the age of 14 or proactively collect their personal information. However, we sometimes receive information about children while providing our services. The information contained within this document apply to children as well as adults.

For this reason, our documentation wherever possible is written such that a person with a reading age of at least 14 should be able to follow its main points.

CALLING OUR HELPLINE

Our helpline operators collect the phone number of incoming calls (if it's not withheld). We hold a log of the phone number, date, time and duration of the call, and may record the audio of the call itself and/or have other personnel listen in during calls for training or quality assurance purposes. We hold this information for 2 years.

We use this information to understand the demand for our services and to improve how we operate. We may also use these numbers to return calls when requested, to reconnect dropped calls, or to resume calls with problem connections. We may also use it to check how many calls we have received from it. We use a third-party provider, Zendesk, to supply and support our telephone-based support service.

SOCIAL MEDIA

We do not participate as an organization in social media due to social media service's use of personal data as a commodity. Personnel working for Integrity Advocate may participate in social media but are restricted from making posts on behalf of Integrity Advocate.

LIVE CHAT

We use a third-party provider, Zendesk, to supply and support our live chat service. Our live chat services will collect the contents of live chat sessions and names and email addresses when provided. This data is retained for two years.

EMAIL

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government guidance on email security and may use third-party services to monitor/screen file attachments, for viruses or malicious software. We use a third-party provider, Zendesk, to supply and support our email support services.

LINKS TO OTHER WEBSITES

Where we provide links to websites of other organisations, this privacy notice does not cover how that organization processes personal information. We encourage you to read the privacy notices on the other websites that you visit.

CHANGES AND UPDATES TO POLICY

This Privacy Policy will continue to remain in effect, except with respect to any changes made for its continued improvement. We reserve the right to update or change our Privacy Policy at any time and recommend you check this Privacy Policy periodically. If we make any material changes to this Privacy Policy, we will notify you by placing a prominent notice on our website.

COMMENCEMENT

This current version of the Integrity Advocate Privacy Policy was made effective March 9, 2020

DEFINITIONS

Controller/Data Controller - Person or organization which “determines the purposes and means of the processing of personal data.” In this case, Integrity Advocate.

(Online) Course Provider - An organization hosting a series of lessons, reachable by a web browser or mobile device, to be conveniently accessed anytime, anyplace.

Personally Identifiable Information (PII) - see Personal Information.

Personal Information - any data which is related to an identifiable natural person where there is a serious possibility that the individual could be identified through use.

REFERENCES

Applicable Privacy Legislation - This policy has been developed with the purpose to meet and exceed globally legislated privacy expectations. Integrity Advocate adheres to the highest standards of privacy, using the Acts and Regulations found in countries like Canada, Australia, the United Kingdom and the United States of America as the basis for this policy.

Corporate Headquarters: 13A Perron Street, Saint Albert Alberta, T8N 1N2

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