

CPLED Privacy Policy

Policy Statement

The Canadian Centre for Professional Legal Education (“CPLED”, “we”, “us” or “our”) is established pursuant to the *Societies Act*, (Alberta) S.A. 2000, c.S-14, for the purpose of delivering the Practice Readiness Education Program (**PREP**) on behalf of the member jurisdictions of the Law Society of Alberta, the Law Society of Saskatchewan, the Law Society of Manitoba and the Nova Scotia Barristers’ Society. CPLED also delivers **PREP** on behalf of its affiliated jurisdictions, the Law Society of the Northwest Territories and the Law Society of Nunavut. CPLED delivers the Legal Research and Writing (**LRW**) program on behalf of the **Federation** of Law Societies of Canada (the “**Federation**”). The programs listed in this paragraph and any other programs offered by CPLED from time to time are collectively referred to as the “**Programs**”. Any reference to CPLED in this document also refers to its **Programs**.

As a society under the laws of the Province of Alberta, CPLED is only subject to privacy legislation if and when it engages in commercial activities. Where the provision and administration of CPLED’s **Programs** do not constitute commercial activities, such **Programs** are not subject to privacy legislation. However, CPLED is committed to protecting the privacy and **Personal Information** of those to whom it provides products and services and of members of the public. CPLED’s Privacy Policy therefore complies with the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c.5 (PIPEDA) and the *Personal Information Protection Act*, S.A. 2003 c. P-6.5 (PIPA).

Defined terms are in **bold text**; definitions can be found in the [CPLED Policy Definitions](#) document.

1. Authority and Application of Policy

- 1.1. This policy applies to all directors, officers, employees and contractors of CPLED who are exposed to **Personal Information** that was collected by or disclosed to CPLED. All collection, use and disclosure of such Personal Information will be done in accordance with this policy.
- 1.2. This policy applies to all CPLED **Students** except where otherwise specified, in which case the policy will be applicable only to **Students** of the indicated **Program**.
- 1.3. **Students** agree to abide by this policy pursuant to the **Student Agreement** which all **Students** signed upon entry to their CPLED program.
- 1.4. This policy applies to both the in-person and virtual environments.

2. Consent

- 2.1. By: (a) registering for or participating in any of the **Programs** offered by CPLED; or (b) contacting CPLED or communicating with CPLED, whether using the CPLED website, email, mail, telephone, or other means; you (whether you are a **Student**, a prospective **Student**, or a member of the public) hereby consent to the collection, use and/or

disclosure of your **Personal Information** by CPLED in accordance with the terms of this policy.

2.2. Your consent may be withdrawn by contacting CPLED in accordance with Section 10 below, unless CPLED needs the **Personal Information** to fulfil a legal obligation, or unless collection, use or disclosure without consent is authorized by law. If you withdraw your consent to the collection, use and/or disclosure of your **Personal Information** by CPLED: (a) you will not be able to register for or participate in any CPLED programs; and (b) CPLED will not be able to contact you or to communicate with you.

2.3. CPLED may collect, use and/or disclose certain **Personal Information** without your consent where permitted or required by applicable law.

3. Purposes for Collection, Use and Disclosure of Personal Information

3.1. CPLED collects, uses and discloses **Personal Information** for the following purposes (“**Identified Purposes**”):

- a. To provide or administer CPLED **Programs** to **Students** in each of the provinces and territories of Canada. This purpose involves many related or subordinate purposes, including (without limitation):
 - I. Processing registration of **Students**;
 - II. Establishing and maintaining relationships with **Students**;
 - III. Delivering the **Programs** to **Students**;
 - IV. Developing a better understanding of **Students** and their requirements and preferences;
 - V. Monitoring **Student** performance;
 - VI. Preventing, detecting, sanctioning or reporting any breach of the requirements of professional behavior, professional integrity, and academic integrity and to ensure **Students**’ compliance with CPLED’s Professional Integrity Policy;
 - VII. Communicating with the **Student**, their principal, their law firm or employer, or the applicable Law Society or the **Federation** regarding the **Student**’s participation in any **Programs**; and
 - VIII. Ongoing development of CPLED **Programs** to improve such **Programs** and to better meet the needs of Students.
- b. To discharge CPLED’s obligations to the Law Society of Alberta, the Law Society of Saskatchewan, the Law Society of Manitoba, the Nova Scotia Barristers’ Society, the Law Society of the Northwest Territories, the Law Society of Nunavut, and the **Federation**;
- c. To develop, enhance, market and provide any additional products and services;

- d. To manage and improve business and operations, including for maintenance and improvement of the CPLED website, statistical purposes and data analytics;
- e. To communicate with **Students**, prospective **Students**, or members of the public that contact CPLED voluntarily;
- f. For any other reasonable purposes as required for the effective delivery of CPLED **Programs**.

4. Collection of Personal Information

4.1. CPLED collects the following **Personal Information** about **Students** enrolled or seeking enrollment in **PREP** for the **Identified Purposes** above:

- a. Name, address, and email address;
- b. Date of birth;
- c. Gender;
- d. Preferred pronoun;
- e. Demographic background;
- f. Emergency contact information;
- g. Articling information including firm name, size of firm, city, province, start date, principal name, principal email address, principal phone number;
- h. Accommodation (if applicable);
- i. Who is paying for tuition fees (e.g., **Student**, firm, scholarship, etc.);
- j. If previously enrolled in a Bar admission course, which province;
- k. Legal degree: institution name, degree type, country, year and month obtained;
- l. **NCA Certificate of Qualification** (if applicable) and prior legal experience (if applicable) country and years of experience;
- m. Verification of the **Student's** Law Society membership, including roll number;
- n. Changes in membership status (if applicable);
- o. Information relating to the **Student's** performance, assessments of the **Student**, and confirmation of the **Student's** progress within **PREP** or completion of **PREP**;
- p. Concerns or information relating to a contravention or potential contravention of the [CPLED Professional Integrity Policy](#);
- q. Records of communications between CPLED and the **Student** or between **Students** but within the **PREP** environment; and
- r. Any other information directly related to **PREP** and reasonably required by CPLED to provide or administer **PREP**.

4.2. CPLED collects the following **Personal Information** about **Students** enrolled or seeking enrollment in **LRW** for the **Identified Purposes** above:

- a. Name, address, and email address;
- b. Date of birth;
- c. Gender;
- d. Preferred pronoun;
- e. Demographic background;
- f. Emergency contact information;
- g. Accommodation (if applicable);
- h. **NCA Assessment Report**;
- i. Information relating to the **Student's** performance, assessments of the **Student**, and confirmation of the **Student's** progress within LRW or completion of **LRW**;
- j. Concerns or information relating to a contravention or potential contravention of the [CPLED Professional Integrity Policy](#);
- k. Records of communications between CPLED and the **Student** or between **Students** but within the **LRW** environment; and
- l. Any other information directly related to **LRW** and reasonably required by **CPLED** to provide or administer **LRW**.

4.3. CPLED collects the following **Personal Information** automatically when an individual visits the CPLED website:

- a. IP address; and
- b. Analytics data such as: page(s) visited, time spent on page(s), time zone, web browser information, country of origin, click-stream data, internet service provider, browser, date and time of the visit, documents downloaded, search activity, and referring URL.

4.4. Where practical, CPLED will collect **Personal Information** directly from the individual to whom the information pertains. In order to participate in CPLED **Programs**, **Students** must provide their **Personal Information** for the **Identified Purposes**, meaning CPLED collects most **Personal Information** on a voluntary basis. Where permitted by law, **Personal Information** may be collected from sources other than the individual to whom the information pertains. CPLED will only collect the **Personal Information** necessary for the Identified Purposes listed above.

4.5. CPLED employs reasonable efforts to ensure that the **Personal Information** collected, used or disclosed by CPLED is accurate and complete.

5. Use and Disclosure of Personal Information

- 5.1.** CPLED will only use or disclose **Personal Information** for the **Identified Purposes** for which it was collected, except with the consent of the individual or as permitted or required by law, including the exceptions permitting use or disclosure without consent established in PIPA or PIPEDA.
- 5.2.** CPLED may disclose **Personal Information** to contractors of CPLED to perform services relating to the **Identified Purposes** on behalf of CPLED, including (without limitation):
- a. Research relating to development or improvement of **Programs**;
 - b. Data processing relating to administration of **Programs**;
 - c. Evaluating **Student** performance within **Programs**;
 - d. Preparation and delivery of services relating to **Programs**; and
 - e. Mailing and other modes of provision of information.
- 5.3.** Some contractors of CPLED are located in the United States of America (USA), and thus, use or disclosure of your personal information will occur in the USA in some circumstances. The purposes of such use or disclosure are set out in Section 5.2 above.
- 5.4.** For **Students** that register for or participate in **PREP**, or that previously registered for or participated in **PREP**, CPLED may disclose **Personal Information** relating to each **Student's** registration, enrolment status (e.g., whether enrolled, unenrolled, withdrawn, suspended, expelled, etc. and any related details), participation, performance and outcomes in **PREP** and any requests (e.g., a readmission request and the ensuing decision), investigations (e.g., in connection with breach of the [CPLED Professional Integrity Policy](#)), findings (e.g., in connection with any investigation), appeals (e.g., a reconsideration request or appeal pursuant to the [PREP Reconsideration and Appeal Policy](#) and the ensuing decision) and decisions made with respect to such **Student** to:
- a. the Law Society in which the **Student** is a member or prospective member; and/or
 - b. the **Student's** principal and certain other persons with the **Student's** employer or law firm who have a need to know such information, as reasonably determined by CPLED.
- 5.5.** For **Students** that register for or participate in **LRW**, or that previously registered for or participated in **LRW**, CPLED may disclose **Personal Information** relating to each **Student's** registration, enrolment status, participation, performance and outcomes in **LRW** and any requests, investigations (e.g., in connection with breach of the [CPLED Professional Integrity Policy](#)), findings (e.g., in connection with any investigation), appeals and decisions made with respect to such **Student** to the **Federation**.

6. Protection of Personal Information

- 6.1. CPLED protects **Personal Information** by using reasonable safeguards appropriate to the sensitivity of the **Personal Information** and makes reasonable efforts to protect **Personal Information** against loss or theft, unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held.
- 6.2. In the event of a security breach involving **Personal Information**, if there is a risk of significant harm to any individual, CPLED will promptly report the breach to the affected individual(s) and to the relevant office of the information and privacy commissioner.

7. Retention

- 7.1. CPLED retains **Personal Information** for as long as reasonably required to: (a) carry out a legitimate business purpose; or (b) comply with a legal obligation.
- 7.2. CPLED may retain certain aggregated, non-identifying information indefinitely for evaluation and statistical analysis related to CPLED **Programs**.

8. Access

- 8.1. Upon written request, CPLED will inform a **Student** of the existence, use and disclosure of their **Personal Information**. CPLED will provide a **Student** with reasonable access to his or her **Personal Information**, subject to any applicable exemptions in PIPA or PIPEDA.
- 8.2. CPLED is unable to provide access to certain **Personal Information** held about a **Student** if providing access would reveal **Personal Information** about another individual. If an access request is denied, CPLED will provide the reasons for denying the access request and the forms of recourse that the **Student** may take.
- 8.3. CPLED will respond to a **Student's** request within a reasonable time and, in any event, not later than the time required by law, subject to extensions permitted by law. If an extension is permitted, CPLED will notify the **Student** of the extension, the reason for the extension, the time in which a response may be expected and the types of recourse a **Student** may take in relation to the decision to extend.

9. Accuracy

- 9.1. PIPEDA and PIPA permit **Students** to submit written requests to CPLED to correct errors or omissions in their **Personal Information** within the custody or control of CPLED. CPLED will correct a **Student's** **Personal Information** upon request and, if reasonable to do so, send correction notifications to any other organizations to which CPLED disclosed the incorrect information. Alternatively, CPLED may decide not to correct the **Personal Information**, but annotate the **Personal Information** that a correction was requested but not made.

10. Contacting CPLED

- 10.1.** If you have any questions, comments or concerns about CPLED's Privacy Policy, or if you wish to exercise any of your rights listed in this Privacy Policy with respect to your **Personal Information**, please contact [CPLED Admin](#).

11. General Provisions

- 11.1.** This Privacy Policy, the subject matter of herein and all related matters will be governed by, and construed in accordance with, the laws of the Province of Alberta and the laws of Canada applicable therein.
- 11.2.** We may update this Privacy Policy from time to time to reflect changes to our privacy practices. We provide **Students** with notice of such updates by posting the notice on **D2L**. We also encourage you to periodically review this policy for the latest information on our privacy practices.