

Users of MyOpenCourt.org Privacy Notice

This website www.MyOpenCourt.org is managed by the Conflicts Analytics Lab, a consortium operated under the Queen's Faculty of Law, located at 128 Union Street, Kingston, Ontario, K7L 2P1. The Conflict Analytics Lab is committed to protecting the privacy of our users' personal information. The purpose of this Notice is to explain how we handle personal information about our users (the "User") and to explain the rights that such Users have under information protection and privacy laws.

Personal information is any information about an identifiable User. In this Notice, we refer to this type of information as "**Personal Information**".

"**CAL**" will henceforth be used synonymously with the Conflict Analytics Lab and any of its subsidiaries and affiliates, as existing from time to time. **CA** is referred to in this Notice as "**we**", "**us**" or "**our**".

We observe **the following principles** when we collect, store and otherwise process User Personal Information:

- **Fairness and Transparency:** Give people information about how CA processes their personal information.
- **Purpose Limitation:** Only collect personal information for a specific purpose. If we want to reuse the personal information for a new purpose, we will make sure the new purpose is compatible with the original purpose.
- **Information Minimisation:** Only process as much personal information as we need, and no more.
- **Accuracy:** Keep personal information accurate, complete and up to date.
- **Retention:** Only keep personal information for as long as we need it. If we don't need the personal information anymore, we will delete it or anonymize it.
- **Security:** Protect personal information from getting lost or stolen. Make sure our service providers protect our personal information as well.
- **Individual Rights:** Allow individuals the right to access, correct or erase their personal information, or object to it being used for certain purposes.
- **Personal Information Transfers:** Put in place safeguards before sending personal information outside Canada or to third parties.
- **Accountability:** We will take steps to make sure our processing of personal information complies with our policies.

1 WHAT USER PERSONAL INFORMATION DO WE COLLECT? We collect various types of Personal Information about you that is used strictly in accordance with the principles outlined above. This may include the following categories of information:

Contact details, such as your address, telephone number and e-mail address, *etc.*

Internet History When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are

installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

Other information, which you voluntarily provide in the course of being a user that it is necessary to hold or use for our business purposes. For example, our questionnaires may ask for your salary, employment history, and other necessary input questions for our algorithms to provide a prediction.

Personal Health Information, which is used to conduct research for COVID-19 vaccine side effects in connection with the Vaccine Mediator tool. Future “healthcare” related tools will follow the same provision. Personal health information is never collected without your consent and must be provided directly from you to us within a tool for us to have access to it. Examples of personal health information include previous medical conditions, current medication, events following vaccination, and others. Personal Health Information is regulated under more rigorous standards and can only be used by the CAL for research and public benefit purposes. We are compliant with both the *Personal Information Protection and Electronic Data Act* (PIPEDA) and the *Health Insurance Portability and Accountability Act* (HIPAA) on these aspects.

2 HOW DO WE OBTAIN USER PERSONAL INFORMATION? Typically, we receive Personal Information in several ways:

- **Directly from you:** For instance, when you use MyOpenCourt.org, you may input information about your situation directly in our website.
- **Indirectly from you:** For instance, the use of cookies automatically when you visit our webpage, capturing information such as your browser settings. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- **From third parties:** For instance, government agencies, banking institutions or other organizations we partner with.

3 HOW DO WE OBTAIN YOUR CONSENT? By using our website, you consent to our collection, use, and disclosure of your Personal Information as outlined in this policy. Your consent is the legal basis for our use of your personal information. You can withdraw your consent at any time by contacting the Chief Privacy Officer at samuel.dahan@queensu.ca. However, if you withdraw your consent to certain uses, we may no longer be able to provide our services to you.

4 WHAT WILL WE DO WITH YOUR PERSONAL INFORMATION? The main purposes for which we use your Personal Information include to

- **Fulfill Your Service Requests**, for example, our AI algorithm may use your Personal Information to provide you with a prediction.
- **Offer Services Based on Your Inferred Interest**, for example, we will use your Personal Information to help connect you with a dispute resolution professional, or to help find the right tool for your unique circumstances
- **Train Artificial Intelligence**, for example, we may use your Personal Information in training sets to help train our tools’ pattern recognition abilities for the purpose of predicting legal outcomes. The

Personal Information we collect may be combined with Personal Information we obtain from other internal and external sources. The ability of CA to improve its tools and access to justice relies heavily on improving the accuracy of our AI models.

- **Healthcare Research**, for example, using self-reporting data to conduct research on the causality between vaccine doses and vaccine adverse events. Personal Health Information may be used for these purposes.
- **Develop Marketing or Aid Campaigns**, for example, to develop marketing or ad campaigns that are targeted towards a specific audience.
- **Personalized Offers and Web Analytics**, for example, we collect information about what site referred you to our website, your browser type, operating system type and version, language, and your Internet Protocol ("IP") address. We also collect information about how you browse through our website, including logging the pages you visit and the amount of time you spend on certain pages. We use this information for a number of technical purposes to ensure that our pages load correctly in your browser, as well as to personalize our offers to you. We also use this information to improve our website. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

FACEBOOK - <https://www.facebook.com/settings/?tab=ads>

GOOGLE - <https://www.google.com/settings/ads/anonymous>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

- **Communicate for User Service Issues**, for example, we may use your Personal Information to contact you regarding user service issues.
- **Legal and Regulatory Compliance**, for example, to ensure compliance with legal or fiscal obligations, or in connection with litigation or an internal investigation or audit and to ensure compliance with our policies regarding privacy.

We will only process your Personal Information where we have a legal basis for doing so. Our processing of Personal Information is generally because it is necessary for us to do so in connection with your use of MyOpenCourt.org. In addition, certain processing may be based on your consent (which you have the right to withdraw), or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests.

5 WHO IS YOUR PERSONAL INFORMATION DISCLOSED TO?

(a) **Within the company**

We restrict access to User Personal Information to people within our company who have a "need to know" for such information for the projects research and public benefit purposes. For example, our project manager(s) may have access to your User Personal Information for artificial intelligence development purposes.

(b) **Outside the company**

We share User Personal Information with our partners that have a “need to know” such information for artificial intelligence development purposes, as well as other third parties outside our group of companies. Generally, we will only disclose your User Personal Information to our other third parties only in the following circumstances:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency;
- to seek legal advice from our external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of a business; and
- with Google Analytics to help us understand how our clients use the Site – you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

6 HOW DO WE RETAIN YOUR PERSONAL INFORMATION? We have implemented appropriate physical, technical, and organizational security measures designed to secure your Personal Information against accidental loss and unauthorized access, use, alteration, or disclosure.

Except as otherwise permitted or required by applicable laws, we will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Once the purposes are fulfilled, we will retain and destroy your personal information in accordance with applicable laws. We maintain a records retention and destruction program to destroy information when it is no longer needed or required. Personal information can be formally requested to be disposed of prior to maturity by emailing CA’s Chief Privacy Officer at samuel.dahan@queensu.ca

7 WHERE DO WE STORE YOUR PERSONAL INFORMATION? Users in Canada should be aware that their Personal Information may be transferred to, and stored at, a destination outside the jurisdiction in which it was collected, including in countries which have less strict, or no information protection laws, when compared to those in Canada. It may also be processed by staff or our partners in jurisdictions other than Canada, which also have less strict, or no information protection laws. The use of cloud-based data storage is paramount to AI efficiency, and thus the need to store your information off site may arise during the course of meeting the objectives outlined on page one.

Whenever we transfer your Personal Information outside of the jurisdiction in which it was collected, we will take legally required steps to ensure that adequate safeguards are in place to protect your Personal Information and to make sure it is treated securely and in accordance with this Notice.

8 EXERCISING YOUR RIGHTS. You have the right to request access to, rectification or erasure of, the Personal Information we hold about you. You also have the right to object to or restrict certain types of processing of your Personal Information.

Any request to exercise one of these rights will be assessed by us on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request or because of relevant legal exemptions provided for in applicable information protection legislation. A lack of legal requirement

to accommodate is not a prima facie reason for us to deny your request, and is used as a determining factor when making such a decision.

9 CONTACT. If you would like to find out more about any matters relating to this Notice or if you have any concerns about the way we handle your Personal Information, please contact: Samuel Dahan at samuel.dahan@queensu.ca.

10 REGARDING CHILDREN AND MINORS. Our website is not intended to be used by children. If we become aware that we have inadvertently received or collected personal information pertaining to a child under the age of consent in the country where the child is located without valid consent, we will delete such information from our records.

11 LINKS TO THIRD-PARTY WEBSITES AND SOCIAL NETWORK PLUG-INS. You may be able to access third-party websites through links available on our website. You may also connect to social networks such as Youtube, Instagram, Facebook and Twitter. These links are provided for your convenience. We do not have any control over those third-party websites and we do not provide any guarantee that the privacy practices of the hosts of those websites meet our standards. Your use of such third-party websites is at your own risk and will be governed by the privacy policies of those websites and not by this Privacy Notice. Do not transmit personal information using those websites without reading the privacy policies governing those websites.

You may create links between our website and social networking sites. If you do so, we may be able to publish updates about our services to your social network account through the links that you establish. You may terminate those links at any time by modifying your social network account.

12 UPDATE. We may change this Notice from time to time in order to reflect changes in the law, regulatory guidance or our information privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice detailing how the use of your Personal Information is changing and, if necessary, obtain your consent for the further processing.

13 DO NOT TRACK Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

This notice was last updated on 03-May-2021.