

PGO PRIVACY POLICY

Professional Geoscientists Ontario (PGO) is the regulatory body of geoscientists in Ontario. This Privacy Policy describes the personal information management practices of PGO relating to its members, students, applicants and other individuals, as applicable.

Changes to this Privacy Policy

PGO reserves the right to change this Privacy Policy from time to time. We recommend that you review this policy periodically so that you are aware of any changes. Your continued use of our on- and off-line services following the posting of any changes to this policy constitutes your acceptance of these changes. The date on which this Privacy Policy was last amended appears at the top.

Personal Information

In this Privacy Policy, "Personal Information" refers to information about an identifiable individual, including an individual's name, business title, business address (including email address), business telephone number, PGO membership status, and right to use the PGO's specified designations. This policy explains the reasons for which we collect Personal Information as well as how we handle that information.

The federal *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), being the particular privacy law applicable to the private sector in Ontario, applies to the collection, use and disclosure of Personal Information in the course of commercial activities. Since the core activities of PGO are regulatory and not commercial in nature, PIPEDA does not apply to most of our activities. Moreover, the Ontario *Freedom of Information and Privacy Protection Act* (FIPPA) does not apply to our activities, because PGO is not an Ontario Crown agency.

Types of information we collect

We gather Personal Information from individuals in person, over the phone, by correspondence via mail or email, or online (e.g., profile updates, downloadable and fillable forms, or applications). The types of Personal Information we collect depend on

whether or not an individual is a member of PGO. The Personal Information we may collect includes name and contact information (where not business information), driving licence, birth certificate, comments or questions about our organization, and financial information required to purchase our goods and services (e.g., continuing education courses, stamps and seals), including credit card information.

The public areas of PGO's website can be visited without providing any Personal Information. Personal information is only collected if visitors voluntarily choose to provide it. We need to validate the identities of visitors to the non-public areas of our website where access is restricted to members or students and so we collect Personal Information of visitors to those non-public areas.

We collect Personal Information for regulatory purposes including information related to whether an applicant for registration or a certificate meets the registration / certification requirements, information related to complaints or other investigations of the conduct, negligence, competence or capacity of members and certificate holders, information to monitor compliance by members and certificate holders with agreements or orders relating to their conduct, negligence, competence or capacity, information to hold hearings about the conduct, negligence, competence or capacity of members and certificate holders, information related to the continuing professional development of members and certificate holders, information related to the reinstatement of former members and certificate holders, information that is posted on our public register and directories, and other information necessary to administer and enforce the Ontario *Professional Geoscientists Act*.

We also collect Personal Information about employers, colleagues and clients of members and certificate holders to the extent that they are relevant to the PGO's regulatory activities (e.g., as witnesses in a complaint or other investigation).

We may collect Personal Information including but not limited to date of birth, gender, languages spoken, language preference, place of residence, course enrolment information, fulfilment of program requirements and results of examinations, record of academic and professional accomplishments outside PGO, and particulars of current and previous employment, education, professional development, and volunteer activities of applicants for registration / certification and members and certificate holders.

For a member engaged in public practice as a sole proprietor, partner or shareholder of a firm or professional corporation, we may collect further information such as business name, names of partners, shareholder information, preferred areas of practice, position codes, practice review results, and professional liability insurance information. As well, we may collect demographic information such as postal code, preferences and interests.

How we use Personal Information

PGO primarily uses Personal Information to carry out our regulatory activities such as registration, complaints, investigations and discipline, to promote high quality practice, to operate the public register, and to prevent illegal practice or the misleading of the public.

PGO also uses the Personal Information that we collect to confirm an individual's identity, to respond to inquiries or comments, to send important notices about the profession, to fulfil legal and regulatory requirements, to protect the public from unauthorized use of PGO designations, to carry out our business activities, and generally to provide individuals with the services they request.

PGO also uses Personal Information to process financial transactions (including membership fees, and purchases of services), to process program transactions (including applications, event registrations, continuing professional development reporting, practice registration, course enrolment, seminar enrolment, academic results processing, and transcript distribution), to communicate information or materials we are required to communicate by law or regulation (including notice of annual meetings), and to maintain the registers of members and certificate of authorization holders that we are required to maintain for public perusal.

Subject to obtaining consent, we may use Personal Information to provide you with tailored communications (including information about services available for purchase, notices of professional development, volunteer opportunities, speaking engagements, or participation in special interest groups) that we believe will be of interest to you.

We may conduct surveys. If you choose to participate in such surveys, we will use the information you provide to better understand your professional profile, your needs, and the needs of users of geoscience services. We may use the information to improve our services.

If you do not wish to receive promotional communications from PGO, you may withdraw your consent to receive these communications at any time by contacting PGO at info@pgo.ca or by mail to the address indicated below.

Sharing Personal Information

From time to time, PGO may disclose the Personal Information of members and students to the PGO's regulators and to other regulators including regulators of professional geoscientists in other jurisdictions. Such disclosure may be made to permit these bodies to register and certify members and certificate holders and conduct regulatory audits; to facilitate inter-regional mobility of members and certificate holders; to operate academic programs; to provide products or services and to the maintain membership; and to communicate information or materials required by law or regulation.

As part of PGO's operations, we may share certain membership information with third-party service providers (i) for purposes of carrying out our internal operations, and (ii) for purposes of providing our services to our members and other stakeholders.

PGO may also disclose the Personal Information of our members to government entities to advocate on behalf of the public interest or as otherwise may be required or requested by them. PGO is required by its governing legislation to maintain registers of members and companies with Certificates of Authorization and to make these registers open to examination by the public at PGO's head office during normal office hours. PGO is also required by legislation to maintain a public register containing each member's name and business contact information, which is available to the public.

Your consent

By providing PGO with your Personal Information and/or by using our website, you are consenting to the collection, use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy. If PGO requests additional Personal Information or intends to use or disclose your Personal Information differently than described in this policy, we will advise you when we collect it or before we use it as to how we will use your Personal Information (subject to certain exceptions discussed below).

There are circumstances established at law under which PGO may collect, use or disclose your Personal Information without obtaining your express consent, for example: (i) to collect a debt owed to us, (ii) to establish and maintain the registers of Members, (iii) to meet government tax reporting requirements, (iv) to carry out our regulatory activities and responsibilities as mentioned above (including those relating to member discipline), and (v) to comply with an order made by a court.

Refusal and withdrawal of consent

Where your express consent to the collection, use or disclosure of your Personal Information is required, you may refuse or withdraw your consent. You should be aware that your choice to refuse or withdraw your consent may negatively affect your ability to meet PGO requirements, or PGO's ability to provide you with certain services. If you would like information about the effect, if any, of refusing or withdrawing your consent, you may contact our Privacy Officer at the address indicated below.

Artificial intelligence (AI) and Personal Information

PGO may use artificial intelligence ("AI") tools to process Personal Information. If so, we will endeavour to process the Personal Information in a manner than is compliant with

both this policy and applicable laws of Canada. In particular, we will clearly disclose when AI is used in making or assisting in making decisions that materially affect individuals, and we will clearly explain how decisions are made using AI, especially in employment and regulated activities. We will conduct, at regular intervals, privacy impact assessments and algorithmic impact assessments for systems under our control that use AI and will identify and mitigate risks of bias, discrimination, and unintended consequences. Our use of AI will be subject to an internal governance framework based on best practices, including roles, responsibilities, and oversight and requiring the maintenance of audit trails and documentation of AI system design, training data, and decision logic. We will use only the Personal Information and other data necessary for purposes of the operation of the AI tools and will endeavour to ensure that such Personal Information and other data are accurate, relevant, and up to date. You will have the right to insist on a "human review" of any AI-driven decisions that materially affect you.

Retention and disposal of Personal Information

PGO keeps personal information for as long as it is necessary for the purposes for which it was collected. Accordingly, we may retain Personal Information for different lengths of time, depending on the nature of the Personal Information and the purposes for which it was provided to us. We dispose of Personal Information in a manner that ensures the continued security of the information.

Security safeguards

PGO takes steps to protect your Personal Information against unauthorized access, disclosure, inappropriate alteration and misuse. PGO uses technological safeguards such as encrypted passwords, secure socket layer (SSL) and at least 128-bit encryption technologies. Given that electronically transmitted data is not 100% secure, we make no warranties as to the security of any information you submit electronically, which you do at your own risk.

Access and Correction of Personal Information

PGO takes steps to ensure that the Personal Information it collects, uses or discloses is accurate. If you wish to access, correct or update your Personal Information in PGO's records, you may contact our office at the address indicated below. Some information may not be available to you, such as information which contains the Personal Information of others, or information the accessing of which would impair PGO's regulatory mandate (e.g., a pending investigation), or information which is otherwise protected under the law. You may also access, correct or update some of your Personal Information online by following the links on our website. There are some circumstances

in which PGO cannot correct information that may be inaccurate, such as where the accuracy of the proposed correction is in dispute or where there is an important regulatory purpose in maintaining the original information in its files (e.g., information obtained in an investigation).

Members and students have a responsibility to maintain current contact information with PGO.

Cookies, IP addresses, and links to other websites

PGO uses Google Analytics. This tool uses cookies to collect and generate information about your visits to our website (including your Internet Protocol address) that is transmitted to Google's servers in an anonymous form for processing. We study patterns of website activity so we can improve the experience of visitors to our site. Google currently offers a free Google Analytics opt-out tool. Click here for the tool. PGO may also use marketing software to enable personalization services.

We may use cookies and similar technologies to provide you with tailored information. Cookies allow us to know that you're logged in and help us to administer our advertising and perform analytics. A cookie is an element of data that a website can send to your browser, for storing on your hard drive so we can more easily recognize you when you return to our website. You may set your browser to notify you when you receive a cookie and you may choose to decline, delete or disable cookies. You should be aware that if you do so you may not be able to access or run certain applications that are on our website.

PGO's website logs IP addresses, but not the email addresses, of visitors. PGO's third-party providers may log email addresses, however. This real time information is aggregated, logged, and used to measure statistical information about usage of the site, including the total number of visits, page errors, average time spent on the site, and pages viewed, both in real-time, and within a certain historical time frame. PGO uses this aggregated information to measure the use of our website and to improve its content and usage.

PGO's website may contain links to other internet sites owned and operated by third parties. When you click on a link to go from PGO's page to another website, PGO's privacy policy is no longer in effect. We are not responsible for the content or the privacy practices of those sites. Since you are solely responsible for deciding whether to visit any particular site, we strongly recommend that you review the privacy policies applicable to those other websites before you proceed to visit the site or provide any personal information there.

Controlling your Personal Information

You may choose to restrict the collection or use of your Personal Information by emailing us at info@pgo.ca.

We will not sell, distribute, or lease your Personal Information to third parties unless we have your permission or are required by law.

Questions or Concerns

If you have any questions, concerns or complaints about PGO's privacy and information practices, contact our Privacy Officer by email at info@pgo.ca or by mail at PGO, Suite 302, 155 University Avenue, Toronto, ON M5H 3B7.

You may also contact the Office of the Privacy Commissioner of Canada to file a complaint about how PGO collects, uses, or discloses Personal Information in the course of commercial activity.

Version Control

| Version | Date | Issue Type | Filename |
|---------|-----------------|---------------------|--|
| V1.1 | July 29, 2025 | Updated | 202500806 FINAL PGO Privacy Policy.docx |
| V1.2 | August 14, 2025 | For Use (formatted) | Aug2025FinalPGOPrivacyPolicy |