



# CALLYSTO

## Privacy Notice

### INTRODUCTION

Callysto is a project partnership between Cybera and the Pacific Institute of Mathematical Sciences (PIMS). Callysto operates in a transparent manner in compliance with the Alberta Freedom of Information and Protection of Privacy (FOIP) and the Alberta Personal Information Protection Act.

### PRIVACY

This notice outlines the access and privacy principles to which Callysto adheres and describes how personal information is used and disclosed.

### PRINCIPLES

Callysto's access and privacy provisions are based on the principles outlined below, which are drawn from the Canadian Standards Association's Model Code for the Protection of Personal Information, recognized as a national standard in 1996.

### ACCOUNTABILITY

Cybera is responsible for the personal information under control of Callysto and has designated the company's Chief Operating Officer as its Privacy Officer, accountable for Cybera's compliance with these principles.

### IDENTIFYING PURPOSES

The purposes for which personal information is collected shall be identified at or before the time the information is collected.

We collect, use, and disclose personal information for the following purposes:

- To respond to or follow-up on any communications sent to Callysto
- To open and maintain accounts
- To authenticate identity
- To track site usage statistics
- To comply with legal and regulatory requirements
- To apply our policies
- To facilitate communication between Callysto and teachers
- To integrate federated identity management authentication via Cybera's Pika service
- To evaluate and improve Callysto

### CONSENT

The knowledge and consent of the individual are required for collection, use, or disclosure of personal information, except when deemed inappropriate.

### LIMITING COLLECTION

The collection of personal information by Cybera shall be limited to the information that is necessary for the purposes identified. Information shall be collected by fair and lawful means.



## WHAT DO WE COLLECT?

Callysto collects the following types of personal information from Callysto users:

- Hashed user identifier based on user email address when users login to hub.callysto.ca.
- Voluntary - First name, last name, email address, job description, organization, city, province/state when users become a registered Callysto Hub user ([link](#)).
- Voluntary - Name and email address from our website contact page ([link](#)).
- Voluntary - Email address, school, school city, school board and years of teaching service from our website sign-up page ([link](#)).

We may also collect the following personal information:

- Voluntary - First name, last name, address, city, postal code from our website sign-up page ([link](#)).

## HOW DO WE COLLECT INFORMATION?

We collect information in the following ways:

- Upon sign-in at hub.callysto.ca, Callysto (the service provider) exchanges authentication and authorization data with the authentication or identity provider (IdP) such as Google or Microsoft. An authenticated users email address undergoes identity hashing to create an unrecognizable user identifier.
- Callysto Hub User Registration information is collected via Google Form ([link](#)).
- Callysto contact page information is collected via website form ([link](#)).
- Callysto sign-up page information is collected via website form ([link](#)).

We strongly encourage teachers to advise students not to enter personal information into a Callysto Jupyter Notebook or any other content created on the platform. However, if personal information is entered into a Jupyter Notebook, the information will be stored on Cybera servers located in Alberta and treated the same as other personal information collected by Callysto.

## LIMITING USE, DISCLOSURE, AND RETENTION

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as deemed necessary for fulfillment of those purposes.

## ACCURACY

We will make a reasonable effort to ensure that personal information is accurate and complete for the purposes for which it is to be used.

## SAFEGUARDS

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

## OPENNESS

Cybera and PIMS shall make readily available to individuals information about its policies and practices relating to the management of personal information as it pertains to the Callysto project.

## INDIVIDUAL ACCESS

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to request a



correction of factual inaccuracies.

#### CHALLENGING COMPLIANCE

An individual shall be able to address a challenge concerning compliance with the above principles to the Privacy Officer.

#### INFORMATION RETENTION

Cybera retains information obtained in connection with administration and project management indefinitely. Individuals may request disposal of personal information by contacting: [contact@callysto.ca](mailto:contact@callysto.ca)

#### KEEPING PERSONAL INFORMATION ACCURATE

Cybera will correct any factual inaccuracies in personal information held by it in response to satisfactory evidence being provided by the individual to whom it relates.

#### PROTECTING INFORMATION

Cybera will use appropriate security measures to protect against loss, theft, or unauthorized access, disclosure, use or modification of personal information collected by it. Such measures involve physical, organizational, and electronic security procedures and systems. Cybera will require that its employees keep personal information confidential and comply with Cybera's personal information security standards. Cybera will take appropriate measures to ensure that, upon disposal and destruction of records, the confidentiality of personal information is maintained.

#### ACCESS TO PERSONAL INFORMATION

Any individual whose information has been collected and held by Cybera may request access to that information. Upon request to the Privacy Officer, Cybera will advise individuals of the existence, use and disclosure of their personal information on file with Cybera. Cybera will respond to reasonable requests. There will be no cost to access information unless the individual requests copies of records, makes multiple requests, or the request involves significant retrieval costs.

In certain circumstances, Cybera may be unable to provide access to some or all of the personal information that it holds about an individual. Such circumstances may include those in which personal information about the individual cannot reasonably be separated from personal information of others, or cannot be disclosed for reasons related to personal security, solicitor-client privilege, or commercial confidentiality.

#### REQUESTS

Individuals may request access to their information, address any questions or concerns regarding their personal information, or change or withdraw their consent to Cybera's use of their information, in accordance with this policy, by contacting Cybera's Privacy Officer at: [privacy@cybera.ca](mailto:privacy@cybera.ca)