



National
Gallery
of Canada

Musée
des beaux-arts
du Canada

NATIONAL GALLERY
OF CANADA

Privacy Notice

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Introduction

The National Gallery of Canada (the “Gallery”) is subject to the federal *Privacy Act* and is committed to protecting the personal information you provide when you buy tickets to an exhibition, become a member, subscribe to newsletters, enroll in educational and outreach programs, make a donation, participate in a survey, access our website, or otherwise interact with us. This Privacy Notice describes how the Gallery generally collects, uses and discloses personal information, as well as our website privacy practices.

Questions concerning this Privacy Notice should be directed to: privacy@gallery.ca

Collection, Use, Disclosure and Retention

Collection

The *Museums Act*¹ is the general authority for the conduct of the Gallery's operations, including the collection of personal information.

Depending on the nature of your transaction with the Gallery, we may collect personal information such as your name and contact and/or payment information for: ticket purchases, memberships, donations, newsletters, contests, information mailings, venue rental, and Boutique transactions, as applicable. The Gallery collects demographic information such as your date of birth, gender and language preference for marketing and fundraising purposes.

Use

As a donor to, or member of, the Gallery, your personal information may be used to provide your membership benefits and communications.

In order to provide you with special offers and other advantages, we may use your personal information for purposes outlined below. In some cases, your explicit consent will be required. Our uses include:

- To respond to your inquiries
- Send you membership renewal forms
- Provide you with our newsletters and brochures
- Conduct financial transactions

- Mail your tickets
- Administer contests, promotions or surveys
- Notify you of, and invite you to, special events and exhibitions
- Solicit financial support and membership purchases
- Generate statistics

Disclosure

Your personal information will only be accessed by employees or representatives of the Gallery who need to use the information for the purposes for which it was provided.

The Gallery also engages third parties to administer certain services. Your personal information will only be shared with these third parties with your knowledge and/or consent, unless required or permitted by law. For example, the Gallery uses third party service providers to process ticket and membership purchases, display online ads, ship online orders, and conduct recruitment activities.

We do not sell your personal information to third parties.

Information Sharing with the National Gallery of Canada Foundation

The National Gallery of Canada Foundation (the “Foundation”) was created in 1997 as an independent legal entity and registered charity, to manage key aspects of the Gallery’s fundraising and donor stewardship activities. The contributions of donors and patrons to help the Gallery to fulfill its national mandate and achieve its vision.

- To enable the role of the Foundation in fulfilling this mandate and vision, limited personal information may be shared between the organizations for legitimate business purposes, on a need-to-know basis. For example, the Foundation may share personal information with the Gallery to invite their donors and patrons to special events and functions, and ensure that they receive agreed upon benefits such as free admission to the Gallery and discounted parking, and issue newsletters and stewardship reports. As well, the Gallery may share limited personal information with its Foundation to acknowledge and recognize donors and patrons, and invite them to special events and functions, and generate statistics.

The Gallery hosts the Foundation’s website on its servers and, accordingly, any privacy practices associated with the use of the Foundation’s website is subject to this Privacy Notice.

All other practices involving the Foundation's collection, use, disclosure and retention of personal information are subject to the Foundations' privacy policy.

For more information, please refer to:

www.gallery.ca/membership-giving/ngc-foundation/contact-us

Retention

The Gallery is responsible for ensuring that all personal information is managed within a set life cycle. According to the *Privacy Act*², the *Privacy Regulations*³ and the *Library and Archives of Canada Act*⁴, the personal information we use to make a decision about an individual shall be retained for at least two years after that decision was made. This allows the person time to exercise legal recourse and provides them with a chance to exercise all their rights under the *Privacy Act*.

As with the Gallery's other information holdings, we retain and dispose of personal information for such periods of time as required by business purposes and in accordance with the terms outlined in our agreement with Library and Archives Canada.

Protection of Children's Personal Information

Education programs at the Gallery bring art to life. Through our education and outreach programs, the Gallery inspires young artists and art enthusiasts. For all children who are registered for a Gallery program, the Gallery collects contact and emergency contact information from the parent or guardian, as well as limited personal information on children aged six and up. The personal information is required for purposes such as identification, ensuring the safety and health of the children who participate in our activities, and apprising parents and guardians of other educational opportunities.

Please note that written consent from the parent or guardian is required for the collection of personal information for any participant under 18 years of age.

Your Privacy and Our Website

The Gallery employs software programs to monitor network traffic and identify unauthorized attempts to upload or change information, or otherwise cause damage. When you visit our website, these software programs automatically receive and temporarily store in our Web server information that is supplied by your browser (e.g., Internet Explorer, Safari, Chrome, and Mozilla Firefox). Information automatically collected by our server when you browse our website includes the following:

- the network location and the Internet Protocol (IP) address of the computer you are using to contact our website;
- the name of the domain you are using to access the Internet (e.g., “.com,” “.org,” “.net,” and “.ca”);
- the type of browser you are using;
- the type of operating system you are using (e.g., Windows and Mac OS);
- the type of device you are using (e.g., smartphone, tablet, or desktop computer);
- the date and time you accessed the site;
- the pages you have accessed and the documents you have downloaded; and
- the Internet address of the website from which you linked directly to our site, if applicable.

In most circumstances, unless an attempt to damage the Gallery’s site has been detected or data is required by law, only aggregate statistical data is collected, and we make no attempt to link this data, or the IP addresses of the computers that have contacted our website, with the identity of individuals visiting our site. The software programs are never used to gather specific personal information such as your name, telephone number or email address.

Cookies

Cookies are small files that may be placed on your hard drive by a website, sometimes without your knowledge, in order to monitor your use of the site. The Gallery uses “persistent” and “session” cookies to monitor usage of its website. The cookies we use do not allow us to identify individuals. They are compiled into statistical information on traffic patterns and are used to assess and improve the efficiency of the Gallery’s website.

- *Session cookies* are cookies that are used on some portions of the Gallery’s website to store information within a session. During your visit to our site, your browser exchanges information with our Web server. Session cookies facilitate this exchange by reminding the server which computer is making the request. No personal information is kept in session cookies, and

they are stored only in your browser's temporary (i.e., cache) memory. When you log out of your session, the cookie is no longer valid; it is discarded when you close your browser.

- *Persistent cookies* are more permanent cookies that can be reread when you return to the site. The information in them is written onto your hard drive and remains there until the expiry date of the cookie (two years after your last visit to the website) or until you delete the file. They are used for tracking traffic patterns to and from our website and can also be used on some portions to find out how visitors access, navigate and use the site. More information on tracking can be found in the next section.

Google Analytics

The Gallery uses Google Analytics, a Web analytics service provided by Google Inc. to help measure traffic patterns to, from, and within its website. This analytics measurement tool uses “session” and “persistent” cookies to collect standard Internet log information and to track visitor behaviour information in an aggregate form. The information generated by the cookies about your use of the website (including your truncated IP address) will be transmitted to Google. No personally identifying information is recorded or provided to Google. The aggregate information is then used to evaluate visitors' use of the website and compile statistical reports on website activity to help us make our site more useful to visitors. This information is made available to Web managers, other designated staff, and/or contracted third parties who require this information to perform their duties.

Information collected for Web analytics purposes may leave Canada for processing and become subject to the governing legislation of other countries.

For further information, consult [Google Analytics](#)⁵ and its [privacy policy](#)⁶.

Opt-out of Being Tracked by Google Analytics

If you wish, you may opt-out of being tracked by Google Analytics by disabling or refusing the cookies, by disabling JavaScript within your browser or by using the [Google Analytics Opt-Out Browser Add-On](#)⁷. Disabling Google Analytics or JavaScript will still permit you to access comparable information or services from our website. However, if you change the settings on your browser so that cookies will be denied or so that you will be warned before a cookie is saved on your computer, moving around on the website may be a much slower process. To disable cookies or JavaScript, please refer to your vendor's browser instruction guide.

Tickets.com – Ticket Sales

The Gallery uses a third-party service provider, Tickets.com, to administer online ticket sales on its behalf. Please note that Tickets.com will not share your identifiable personal information with any other third parties unless permitted and/or required by law.

By choosing to purchase tickets online, you agree to become subject to the Tickets.com [privacy policy](#)⁸ and [terms of use](#)⁹. Please note that Tickets.com may store your personal information gathered through online ticket sales on dedicated servers outside of Canada. Your personal information may therefore become subject to the laws of other jurisdictions.

For any questions specific to the privacy practices associated with Tickets.com, please contact: privacy@tickets.com

Shopify and TD Merchant Solutions – Membership Sales

The Gallery uses a third-party service provider, Shopify, to process membership sales on its behalf. When purchasing a membership through Shopify, your credit card information will be processed through a third-party TD Merchant Solutions payment platform, powered by “Bambora”. This platform is a secure, Payment Card Industry (PCI) compliant solution that securely processes credit card transactions. Credit card information is used only for the purpose of processing your purchase and is not stored by the Gallery.

By proceeding with an online Membership purchase, you become subject to the privacy and security practices of Shopify, TD Merchant Solutions and Bambora. Limited personal information gathered through online membership sales may be shared outside of Canada in accordance with the third-party policies listed below. Your personal information may therefore become subject to the laws of other jurisdictions.

For more information, please refer to:

- [Shopify Privacy Policy](#)¹⁰
- [Shopify Terms of Service](#)¹¹
- [Bambora Privacy Policy](#)¹²
- [Bambora Terms and Conditions](#)¹³
- [Toronto Dominion Bank Terms and Conditions of Use](#)¹⁴ (PDF)
- [TD Merchant Services Privacy Agreement](#)¹⁵ (PDF)

TD Merchant Solutions – Boutique Sales

When you place an order with the Gallery's online Boutique (www.ShopNGC.ca), we request the necessary information to process your order which may include your name, billing and shipping address, telephone number, e-mail address, and credit card information.

The Gallery uses a third-party TD Merchant Solutions payment platform, powered by “Bambora”, for its online Boutique sales. This platform is a secure, Payment Card Industry (PCI) compliant solution that securely processes credit card transactions. Credit card information is used only for the purpose of processing your purchase and is not stored by the Gallery.

TD Merchant Solutions and Bambora will not share your identifiable personal information with other third parties unless permitted and/or required by law.

By proceeding with online Boutique purchases, you become subject to the privacy and security practices of TD Merchant Solutions and Bambora. Limited personal information gathered through online Boutique sales may be shared outside of Canada in accordance with the third-party policies listed below. Your personal information may therefore become subject to the laws of other jurisdictions.

For more information, please refer to:

- [Bambora Privacy Policy](#)¹⁶
- [Bambora Terms and Conditions](#)¹⁷
- [Toronto Dominion Bank Terms and Conditions of Use](#)¹⁸ (PDF)
- [TD Merchant Services Privacy Agreement](#)¹⁹ (PDF)

NJOYN – Recruitment

The Gallery uses a third-party service provider called NJOYN, a subsidiary of CGI Group Inc., to facilitate its online recruitment activities. NJOYN will not share your identifiable personal information with other third parties unless permitted and/or required by law.

By submitting an online application for a career opportunity with the Gallery, or otherwise interacting with the NJOYN website, you agree to become subject to the NJOYN [privacy policy](#)²⁰ and [terms of use](#)²¹. Please note that NJOYN stores your personal information gathered through

online recruitment activities on dedicated servers in Canada. Your personal information may therefore become subject to the laws of other jurisdictions.

For any questions you have about the privacy practices associated with NJOYN, please contact:

The Privacy Officer, CGI Group Inc.
1350 René-Boulevard West, 15th Floor
Montreal, Quebec H3G 1T4

The Ads We Show You

The Gallery collects and uses information about your Web browsing behaviour, such as the pages you have visited, the searches you have made, and your number of clicks (including the ads you have clicked), for the purposes of online advertising. This information is used to select which advertisement about the Gallery's offerings should be targeted and displayed to you on other websites. The ads we display become more relevant when they are shown to individuals who are likely to be interested in the offering we advertise.

To this end, the Gallery works with third parties (our "Service Providers") to market to you in a way that best reflects your interests, which in turn, facilitates your overall website experience. This may involve sharing information with our Service Providers. The Gallery and our Service Providers may use cookies or similar technologies in order to provide you with advertising based on your browsing behaviour. These types of ads are called "interest-based advertising".

Our Service Providers are based in other jurisdictions which means that information may be transmitted outside of Canada and become subject to the governing legislation of other countries.

Opt-out of Interest-Based Ads

If you would like to learn more about our Service Providers' privacy practices and/or opt-out of interest-based advertising by our Service Providers, you may do so by clicking the links available in the sections below.

Please review this list of Service Providers periodically as it may be updated from time to time.

Facebook Pixel

The Facebook pixel is a code that has been placed on our website. It collects data about our website visitors that helps the Gallery to track conversions from Facebook ads, optimize ads, build targeted audiences for future ads, and remarket to individuals who have already

taken some kind of action while on our website. It works by placing and triggering cookies to track users as they interact with both our website and the Gallery's Facebook ads.

Individuals that wish to limit the advertisements personalized to them as a result of Facebook Pixel can adjust their preferences. For instructions in doing so, please refer to: [Facebook](#)²².

Google Display Network

Google Display advertising relies on data collected from your Google profile, and other information such as device type and id, operating system, and cookies, to keep track of the websites you visit and the searches you make. This information is accessible to Google when you are signed into Google Chrome, or a Google account such as YouTube or Gmail.

Google uses the data it collects to track your browsing activity and personalize your online experience. Advertisers, like the Gallery, are then able to reach their target audiences and show you ads that are more likely to be relevant. Cookies or similar technologies are also used to track your interaction with the Gallery's advertisements on third-party websites in order to measure ad campaign success rates.

The Gallery's use of this service is subject to Google's [Policy for advertising based on interests and location](#)²³ and Google's [Privacy Policy](#)²⁴

You may opt out of Google's use of cookies by visiting Google's [Ad Settings](#)²⁵

Other Companies – General Opt-out

NOTE – The above options will opt you out of interest-based advertising however you may continue to receive generic, non-personalized ads that are not as relevant to you.

You may also opt-out of one or more companies' uses of cookies for the purposes of interest-based advertising by visiting the [Network Advertising Initiative opt-out page](#)²⁶.

To find out how to stop seeing interest-based ads from other companies and ad networks that participate in self-regulatory programs, visit the following sites:

In Canada: [Ad Choices: Digital Advertising Alliance of Canada \(DAAC\)](#)²⁷

In the US: [Digital Advertising Alliance \(DAA\)](#)²⁸

Social Media

The Gallery's use of social media serves as an extension of our presence on the Internet. Social media accounts are public and are not hosted on Gallery servers. Users who choose to interact with us via social media should read the terms of service and privacy policies of these third-party service providers and those of any applications used to access them. The Gallery uses Facebook, Twitter, Instagram, LinkedIn, and YouTube.

Personal information that you provide to us via social media accounts is collected to capture conversations (e.g. questions and answers, comments, "likes", etc.) between you and the Gallery. It may be used to respond to inquiries, or for statistical, evaluation and reporting purposes. Comments posted that violate Canadian laws will be deleted and disclosed to law enforcement authorities. The personal information that you provide directly to us falls under Personal Information Bank *PSU 938 Outreach Activities*²⁹.

Use of Website by Children

The Gallery does not solicit personal information from children on its website. Website visitors under the age of majority are required to obtain parental or guardian consent before submitting any personal information.

The Security of Our Website and Electronic Communications

The Gallery uses software programs to monitor network traffic and identify unauthorized attempts to change information, or damage our systems. This software receives and records the IP address of the computer that has contacted our website, the date and time of the visit and the pages visited.

The Gallery makes no attempt to link these addresses with the identity of individuals visiting our site unless we have detected or been advised of an attempt to damage the site.

The information may be shared with law enforcement authorities if we suspect criminal activities. This information may be used for network security related statistical purposes, audit, evaluation, research, planning and reporting. It is included in Personal Information Bank *PSU 939 Security Incidents and Privacy Breaches*³⁰.

Emails and other electronic methods used to communicate with us are not secure unless it specifically says so. It is not recommended that you send sensitive personal information, such as your Social Insurance Number or your date of birth, through non-secure electronic means.

Your Choice – Your Rights

You do not always need to use the *Privacy Act* to access or correct your personal information held by the Gallery: an “informal request” can be made in this regard. At any time however, you may exercise your right under the *Privacy Act* to submit a formal request for access to or correction of your personal information.

For questions or concerns about the Gallery’s privacy practices or to exercise your rights under the *Privacy Act*, please contact:

Access to Information and Privacy Office
National Gallery of Canada
P.O. Box 427, Station A
Ottawa, Ontario K1N 9N4

T 613-714-6000 ext. 6129
privacy@gallery.ca

If we are unable to resolve your inquiry in a satisfactory manner, or you would like more information on the *Privacy Act*, you can contact the Office of the Privacy Commissioner of Canada at: www.priv.gc.ca

- 1 laws-lois.justice.gc.ca/eng/acts/m-13.4/index.html
- 2 laws-lois.justice.gc.ca/ENG/ACTS/P-21/page-1.html
- 3 laws.justice.gc.ca/eng/regulations/SOR-83-508/page-1.html
- 4 laws-lois.justice.gc.ca/eng/acts/L-7.7
- 5 marketingplatform.google.com/about/analytics
- 6 policies.google.com/privacy?hl=en
- 7 tools.google.com/dlpage/gaoptout?hl=en
- 8 images.tickets.com/policy/privacy.html
- 9 www.tickets.com/tos
- 10 www.shopify.com/legal/privacy
- 11 www.shopify.com/legal/terms
- 12 www.bambora.com/en/ca/privacy-policy
- 13 www.bambora.com/en/ca/terms-conditions
- 14 cdn.na.bambora.com/terms/TD_Merchant_Service_Terms.pdf
- 15 cdn.na.bambora.com/terms/TDMS_Privacy_Agreement.pdf
- 16 www.bambora.com/en/ca/privacy-policy
- 17 www.bambora.com/en/ca/terms-conditions
- 18 cdn.na.bambora.com/terms/TD_Merchant_Service_Terms.pdf
- 19 cdn.na.bambora.com/terms/TDMS_Privacy_Agreement.pdf
- 20 www.njoyn.com/privacy-policy
- 21 www.njoyn.com/terms-of-use
- 22 www.facebook.com/help/247395082112892
- 23 support.google.com/adwordspolicy/answer/143465?hl=en
- 24 policies.google.com/privacy?hl=en
- 25 support.google.com/ads/answer/2662922?hl=en
- 26 www.networkadvertising.org/managing/opt_out.asp
- 27 youradchoices.ca
- 28 optout.aboutads.info/?c=2&lang=EN
- 29 www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information/information-about-programs-information-holdings/standard-personal-information-banks.html#psu938
- 30 www.canada.ca/en/treasury-board-secretariat/services/access-information-privacy/access-information/information-about-programs-information-holdings/standard-personal-information-banks.html#psu939