



# GEORGE BROWN COLLEGE ANTI-SPAM COMMITMENT

The George Brown College (the "College") is committed to providing transparency to outside parties with respect to the compliance of the organization's electronic communication with Canada's Anti-Spam Legislation, in effect as of July 1<sup>st</sup>, 2014, and its relevant rules and regulations (hereinafter "CASL"). To that end, the College's Anti-Spam Commitment is a formal statement of rights and obligations which is made available to outside parties. It is intended to inform outside parties of the type of responsible and transparent practices adopted by the College when electronically communicating with outside parties; to inform outside parties who they may contact at the College for any concern pertaining to electronic communications, and to inform such outside parties of where and how they may unsubscribe to any electronic communications from the College. This document also includes a series of answers to questions about spam and the College's practices that are frequently asked by outside parties that the College may communicate with.

## WHAT CAN YOU DO IF YOU NO LONGER WISH TO RECEIVE COMMERCIAL ELECTRONIC MESSAGES (CEM) FROM THE COLLEGE?

At the College, we take the respect of laws, and your privacy, very seriously. You may unsubscribe at any time from receiving CEM by clicking on the unsubscribe link in the CEM you received in order to manage your preferences in our Preference Centre, where you may also unsubscribe from CEMs on a list-by-list basis. **Please note that if you have subscribed to receive certain George Brown College commercial emails based on your interests, that you may still receive those emails unless you unsubscribe from such interests as well.** You may also contact us at [casl@georgebrown.ca](mailto:casl@georgebrown.ca) to process your request to not be contacted over social media and to be removed from lists. Please forward the email you received to help us identify the list and sender. We will remove you from our list within ten business days.

## WHO CAN YOU CONTACT WITH QUESTIONS OR CONCERNS ABOUT THIS ANTI-SPAM COMMITMENT?

If you need further assistance, please contact us at [casl@georgebrown.ca](mailto:casl@georgebrown.ca), or submit your inquiry via email.

## HOW IS SPAM REGULATED?

Any electronic communication sent by the College to outside parties is protected by a range of business procedures, processes and policies to ensure that such communication is done in compliance with CASL. The College, in its electronic communications with outside parties, has to comply with the rules established by CASL and enforced by the Canadian Radio-television and Telecommunications Commission (CRTC), the Competition Bureau and the Privacy Commissioner of Canada. CASL regulates all CEM. These are messages that include the encouragement of participation in a commercial activity.

## WHAT IS THE COLLEGE DOING TO COMPLY WITH CASL?

The College has undertaken various initiatives in order to make sure that it is compliant with CASL. It has adopted this Anti-Spam Commitment to provide transparency to outside parties with respect to the compliance of the organization's electronic communication practices with CASL, as well as undertaking the following initiatives:

### **The College has adopted the Preference Center**

A Preference Center has been adopted to manage CASL's consent requirements. The consent of outside parties is necessary in order for the College to send a CEM. This consent typically must be "express", but in certain circumstances consent can be "implied" and in others, messages are specifically exempt from consent requirements.

Express consent means that the recipient said “yes” (opted-in) to receiving the College’s CEM. The College has modified certain consent forms in order to ensure that the express consent obtained from recipients is in compliance with CASL. As mentioned above, the College has adopted a Preference Center to allow outside parties to manage their communication preferences. You may be periodically asked to update your preferences in the Preference Centre, or you may also submit a verbal or written request to have your preferences or email address updated.

The Preference Center makes it easy for our students, alumni, donors, contacts, clients, suppliers, vendors, business partners and prospective students to modify how we interact with them without the need for completely unsubscribing from our list. Your preferences can be updated at any time by clicking the preferences link in the email received. You will be notified via email when changes have been made. Please note: in order for you to change your email address, you will need to unsubscribe the old address and enter your new address with associated preferences into the Preference Center. If you are subscribed to multiple College lists, you must update them on a list-by-list basis.

### **The College has modified its email footers**

Under CASL, all CEM must include certain prescribed content. For example, CEMs must clearly identify the College as the party sending the CEM; provide a method where the recipient can readily contact the College, such as a mailing address and one of (i) a telephone number with active response voicemail, (ii) an email address, or (iii) a web address; and provide a working unsubscribe mechanism. In consequence, the College has modified its email footers to meet CASL’s consent requirements.

### **The College has incorporated Unsubscribe Mechanisms**

Under CASL, each CEM must provide a working unsubscribe mechanism (functional for 60 days), which must be processed without delay, within a maximum of ten business days. The College has therefore incorporated unsubscribe mechanisms into CEMs, in order to manage CASL’s consent requirements. Moreover, the College has set up processes for all CEMs in order to ensure that all unsubscribe requests will be complied with.

## **WHY ARE YOU RECEIVING A CEM FROM THE COLLEGE?**

The types of CEMs that the College may send from time to time could include the following:

- CEM sent to the College’s current or potential students by the Marketing & Communications department or other departments or divisions at the College. For example, this may be for prospecting purposes or in order to answer a request for information or an inquiry;
- CEM sent to the College’s donors and alumni. For example, this may be purposes of fundraising, extending partner offers or for prospecting.
- CEM sent to the College’s current or potential suppliers, vendors and service providers by various College business units. For example, the College may outsource part of its activities to a third party (such as a maintenance company, a translation service provider, etc.) or, the College’s HR department may contact potential employees electronically for recruitment purposes.
- CEM sent to the College’s current or potential business partners. For example, the College has various partnerships with governmental agencies, community and industry organizations, employers as well as potential vendors and suppliers.

**If you have received a CEM from the College and you believe that you should not have, please assess as to whether you have provided implied or express consent to send CEMs, or if an exemption applies.**

**Express Consent:** Express consent means that the recipient said “yes” (opted-in) to receiving the College’s CEM. The College has modified certain consent forms in order to ensure that the express consent obtained from recipients is in compliance with CASL. You can verify that you have provided express consent to the College (or verify the status of your consent) by reviewing your preferences in the Preference Center available through the email you received from George Brown College.

**Implied Consent:** The College may infer your implied consent if:

- » The College has an existing business relationship with you or has a former business relationship with you which terminated less than two years ago (for instance, if you are a former student, vendor, or supplier);
- » The College received an inquiry from you within the last six months;
- » You disclosed your electronic address to a College employee (for example you provided your business card to a College employee) or you conspicuously published your electronic address (for example, via a corporate website or in a brochure) and the CEM sent is in connection with your business role and function.

## **WHEN IS AN ELECTRONIC MESSAGE EXEMPT UNDER CASL?**

If you are receiving an electronic communications from the College, it may be a message that is exempt under CASL. This would be the case if the message is one the following:

- You have a personal relationship with a College employee who contacted you, meaning that you have previously had a direct, voluntary, two-way communication.
- You have a family relationship with the College employee who contacted you.
- The CEM is sent within the College (between employees of the College).
- The CEM is sent between the College and another business, where there is an ongoing relationship between the College and this other business.
- The CEM was sent by the College to you, in order to respond to your request or inquiry.
- The CEM was sent by the College to you, in order to enforce a legal right or obligation (for instance, if you have an outstanding debt, or breached a contract that you have with the College, etc.).

In certain situations, your consent is not required for certain types of messages sent by the College, although you may still unsubscribe from future transmission of similar messages. The type of messages where the College does not need your consent is an electronic message that:

- is sent once, following a referral by a current College student, supplier, vendor, service provider, business partner or employee who also has a personal or business relationship with you.
- only provides you with a request for a quote or an estimate;
- only facilitates or confirms a transaction;
- only provides the College campus safety or security information;
- only provides information about:
  - » your ongoing use of College services or products or ongoing purchases;
  - » your ongoing College registration, membership or accounts;
  - » the College's employment relationships or benefit plans; or
  - » donations to charities.

If you have received a CEM, and you believe that you should not have, please contact us immediately at [casl@georgebrown.ca](mailto:casl@georgebrown.ca) and we will promptly remove your address from our list (within ten business days) if required under CASL.

## **SOCIAL MEDIA**

You may be contacted by a College employee via social media, such as LinkedIn. If you are connected on the social network with the College employee, or if you have indicated through your preference settings the fact that you are open to receiving messages about new business opportunities or ventures. You may also be contacted if you have conspicuously published your electronic address (for instance, on a social media website), have not indicated that you did not wish to receive CEMs, and the CEM sent is in connection with your business role and function.

## **WHAT TO DO IF YOU NO LONGER WISH TO RECEIVE CEM FROM THE COLLEGE?**

At the College, we take the respect of laws, and your privacy, very seriously. You may unsubscribe at any time from receiving CEM by clicking on the unsubscribe link in the CEM you received in order to manage your preferences in our Preference Centre, where you may also unsubscribe from CEMs on a list-by-list basis. Please note that if you have subscribed to receive certain George Brown College commercial emails based on your interests, that you may still receive those emails unless you unsubscribe from such interests as well. You may also contact us at [casl@georgebrown.ca](mailto:casl@georgebrown.ca) to process your request to not be contacted over social media and to be removed from lists. Please forward the email you received to help us identify the list and sender. We will remove you from our list within ten business days.

## **AMENDMENT OF THIS ANTI-SPAM POLICY AND GUIDELINES**

From time to time, the College will review and update this Anti-Spam Commitment as required to keep current with rules and regulations, new technologies, standards, our business practices and outside parties' concerns. We will post any Anti-Spam Commitment changes on this page and, if the changes are significant, we will provide a more prominent notice (including, as the case may be, email notification of Anti-Spam Commitment changes).

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