



PRIVACY POLICY

Your information, *in your hands.*

*How we collect, use, store, and protect personal information*

*A project and social enterprise of*  
ElevateHER Mental Health Support Services Canada

PIPEDA-compliant · Version 1.0 · April 2026

## HOW TO READ THIS DOCUMENT

# Plain language. *Real protections.*

This is the Privacy Policy that governs how MindBank collects, uses, stores, shares, and protects personal information. It applies to everyone who interacts with MindBank — contributors, applicants, subscribing organizations, website visitors, partners, and the public.

It is written in plain language because the people whose information we hold deserve to understand what we do with it. The legal terms that bind us are also documented in our contributor agreement, subscriber agreement, and Data Protection & Security Policy.

If you are a contributor or applicant, the sections most relevant to you are **2, 4, 5, 7, and 9**. If you have a question about your information that this document doesn't answer, contact our Privacy Officer at [privacy@mindbank.ca](mailto:privacy@mindbank.ca).

## 01. The principles behind every privacy decision

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These five principles underpin every specific rule that follows.

### 1.1 We collect only what we need

We do not collect information out of curiosity, completeness, or for "future use." Every piece of information we collect serves a specific, current purpose. If we don't have a current purpose, we don't collect it.

### 1.2 Consent is meaningful, not buried

Consent to collect, use, or share information is requested in plain language at the moment it's relevant — not buried in a long agreement signed once at the start. You can withdraw consent at any time, and we will explain what that means for your information.

### 1.3 Your information lives in Canada

All identifying information about contributors, applicants, and subscribers is stored on Canadian-region servers, governed by Canadian privacy law (PIPEDA), and not transferred to other countries without your explicit consent.

### 1.4 Sensitive information receives sensitive handling

Information about mental health, lived experience of trauma, identity, and personal circumstances is treated with the heightened care that Canadian law requires for sensitive personal information — and beyond, where MindBank's values demand it.

### 1.5 Transparency runs in both directions

You can see what information we hold about you, request corrections, request deletion, and ask questions about how your information is being used. We answer those requests within 30 days, in writing, with reasoning.

## 02. What information we collect

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### 2.1 From contributors and applicants

When you apply to contribute, we collect:

- Your name and preferred pronouns
- Your email address and (if you choose) phone number
- Your province of residence
- Your areas of lived experience (selected from categories you choose)
- Information you choose to share in your application

When you participate in pre-screening, we additionally collect:

- Notes from the conversation (taken by the clinical reviewer)
- Your stated preferences for contribution format, topics, geographic visibility, and check-in cadence
- Your signed contributor agreement
- Your preferred payment method and the information needed to pay you

When you contribute, we additionally collect:

- The content you contribute, in whatever form you create it
- Editorial communications between you and our team
- Approval records confirming you authorized publication
- Records of any changes, withdrawals, or pauses you request

### 2.2 From subscribing organizations

When organizations apply for and use a MindBank subscription, we collect:

- Organization name, registration details, and primary contact information
- Information about how they intend to use MindBank content
- Records of which content they have accessed
- Annual impact reports and reflections
- Subscription and payment records

### 2.3 From website visitors

When you visit mindbank.ca without creating an account, we collect:

- Standard server logs (IP address, browser type, pages visited, timestamps) for security and analytics purposes
- Cookies necessary for the site to function
- Information you submit through any forms (contact, application)

**We do not use third-party advertising trackers. We do not share visitor data with marketing platforms.**

## 2.4 What we do not collect

- Information about you from third parties without your knowledge
- Social media profiles or public content unless you explicitly direct us to it
- Biometric information (facial recognition, voice prints, etc.)
- Information about your family members, friends, or others you mention in your contribution, beyond what you have chosen to share

## 03. Why we collect this information

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MindBank collects personal information for these specific purposes, and no others:

- **To evaluate applications fairly** in line with our published criteria. Application information allows us to assess fit, capacity, and timing — as documented in our Compensation Policy, Section 3.
- **To support contributors** through pre-screening, contribution, and ongoing engagement. This includes practical needs (scheduling, payment) and substantive needs (editorial collaboration, clinical support, honouring your preferences).
- **To process payments to contributors.** Banking and contact information is used solely to deliver compensation as outlined in the Compensation Policy.
- **To deliver content to subscribing organizations** and verify their compliance with the ethical use agreement. Subscriber records track what they have accessed, so that we can notify them if a contributor withdraws content.
- **To meet our legal obligations.** This includes tax reporting (CRA T4A obligations for contributor compensation), PIPEDA breach notification requirements, and any other lawful obligations that arise.
- **To improve MindBank's services** and report transparently on our work. Aggregate, de-identified data is used for our annual transparency reports and to improve the platform. Individual contributor information is never used for these purposes without specific consent.

*We do not use your information for purposes other than those above. If a new purpose arises in the future, we will request your consent before using your existing information for it.*

## 04. Who has access to your information

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Access is limited to the minimum number of people who need it to do their work, and is tracked.

### 4.1 Within MindBank

- **Project lead (Stephanie Atwood, ElevateHER):** Full access to all data for operational and accountability purposes. Designated Privacy Officer for PIPEDA purposes.
- **Clinical reviewer (contracted):** Access to contributor wellbeing-relevant information, pre-screening notes, and contribution drafts during clinical review. No access to subscriber data.
- **Editorial contractors (where engaged):** Access only to the specific contributions they are working on. No access to contributor identifying information beyond the working name.
- **Developer (contracted):** Technical access to systems for maintenance and development. Bound by contractor agreement requiring confidentiality. Access to identifying information minimized through technical controls (Row Level Security, role-based access).

### 4.2 Outside MindBank

- **Subscribing organizations:** Access only to anonymized, contributor-approved content. Never to contributor identifying information, payment records, or pre-screening notes.
- **Service providers:** Limited information sharing only as needed to deliver services (e.g., payment processor sees banking information only for the transaction; cloud hosting provider stores encrypted data without ability to access it).
- **Legal authorities:** Information may be shared only where legally compelled (e.g., valid court order). We will notify the affected person before sharing, unless legally prohibited from doing so.

### 4.3 What we will never do

We will never:

- Sell or rent your information
- Share contributor identifying information with subscribing organizations
- Provide information to law enforcement absent valid legal compulsion
- Share information with researchers or journalists without your specific consent
- Use your information for marketing or advertising
- Transfer your information to other organizations as part of a partnership without your consent

## 05. How long we keep information

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Different categories of information are retained for different periods, based on the purpose they serve.

Category	Retention period	Reason
Contributor identifying info (active)	Engagement + 2 years	Maintain relationship, answer questions
Contributor info (after withdrawal)	30 days from request	Legal minimum, then destroyed
Pre-screening notes	2 years from conversation	Care continuity
Published content	Indefinite (subject to withdrawal)	Until contributor requests removal
Payment records	7 years	CRA tax retention requirements
Subscriber org records	Subscription + 3 years	Audit and accountability
Website analytics (de-identified)	24 months	Service improvement
Application records (declined)	1 year, or longer with consent	Support re-application

After the retention period ends, information is destroyed in production within 14 days and removed from backups within 30 days.

## 06. How we protect information

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### 6.1 Technical protections

- Canadian-region servers (Supabase, ca-central-1) for all identifying data
- Encryption in transit (TLS 1.3) for all data moving between systems
- Encryption at rest for all stored data
- Row Level Security policies in our database, ensuring users can only access their own information
- Role-based access control for staff, with the principle of least privilege
- Automatic backups, encrypted, retained for 90 days

### 6.2 Organizational protections

- Confidentiality clauses in every contractor and staff agreement
- Privacy training for everyone with access to personal information, before access is granted
- Access logs reviewed monthly for anomalous activity
- Incident response plan for suspected breaches
- Annual security review of our systems and practices

### 6.3 Limitations we acknowledge

No system is perfectly secure. We commit to:

- Telling you within 72 hours if your information is involved in a confirmed breach
- Notifying the Office of the Privacy Commissioner of Canada where required by PIPEDA
- Documenting and learning from every incident
- Updating this policy and our practices when we identify weaknesses

## 07. Your rights

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Under PIPEDA and MindBank's own commitments, you have the following rights:

### 7.1 The right to know

You can ask what information we hold about you. We will respond within 30 days with a complete account of:

- What information we have
- Where it came from
- How it has been used
- Who it has been shared with

**This service is free.**

### 7.2 The right to correct

If any information we hold about you is inaccurate, you can request correction. We will make the correction within 14 days, or explain in writing why we believe the existing information is accurate.

### 7.3 The right to withdraw consent

You can withdraw consent for the use of your information at any time. We will explain what your withdrawal means in practice (for example: removal from the platform, return to limited storage, etc.) and act on it within the timelines stated in this policy.

### 7.4 The right to delete

You can request deletion of your information, subject to legal retention requirements (e.g., tax records that must be retained for 7 years). We will:

- Delete what we are legally able to delete within 30 days
- Explain what we are legally required to retain, why, and for how long
- Destroy retained information when the legal requirement ends

### 7.5 The right to portability

You can request a copy of your information in a standard format (PDF or CSV) for your own records or to transfer to another service.

### 7.6 The right to complain

If you believe MindBank has not handled your information appropriately, you can:

1. **Contact our Privacy Officer** at [privacy@mindbank.ca](mailto:privacy@mindbank.ca)
2. **File a complaint with the federal regulator** if unsatisfied with our response: Office of the Privacy Commissioner of Canada at [priv.gc.ca](http://priv.gc.ca)

We will not retaliate against anyone who raises a privacy concern.

## 08. Cookies and tracking

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### 8.1 What we use

- **Essential cookies:** Required for the site to function (login session, security tokens, language preference)
- **Analytics:** Privacy-respecting analytics (Plausible or similar) to understand how the site is used in aggregate. No individual tracking, no cross-site tracking.

### 8.2 What we do not use

- Advertising trackers
- Cross-site tracking pixels
- Social media tracking widgets
- Fingerprinting techniques
- Behavioral profiling tools

### 8.3 Your choices

You can:

- Use browser-level privacy tools (Do Not Track, blocking third-party cookies) — we honour these
- Decline non-essential cookies through our cookie banner on first visit
- Use the site without an account (with reduced functionality)

## 09. Special protections for sensitive information

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Lived-experience information is sensitive personal information under PIPEDA, and we treat it with elevated care.

### 9.1 What counts as sensitive

For MindBank purposes:

- Mental health experiences
- Experience of intimate partner violence
- Substance use experiences
- Housing instability experiences
- Sexual orientation, gender identity, racial identity, disability — any of these you have chosen to share
- Any other information that could expose you to harm if disclosed

### 9.2 Elevated handling

For sensitive information, we additionally:

- Limit access to the project lead and clinical reviewer only
- Require explicit consent for any new use, even within MindBank
- Anonymize before any aggregate reporting
- Apply stricter retention limits where appropriate
- Notify you of any access by anyone other than the project lead or clinical reviewer

### 9.3 Information that never leaves us

The following categories of information are never shared with subscribing organizations or any third party, under any circumstances:

- Your full name
- Your email, phone number, or address
- Specific identifying details from your lived experience
- Your payment information
- Your pre-screening conversation notes
- The fact of whether you have or have not contributed (we don't disclose this)

## 10. Children and youth

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MindBank's contribution platform is for adults (18+). We do not knowingly collect information from anyone under 18 in connection with contribution.

If you are under 18 and believe you have submitted information to MindBank, contact our Privacy Officer immediately and we will delete it.

Educational use of MindBank content by subscribing organizations may include youth-serving contexts, but those organizations are responsible for age-appropriate handling under our subscriber agreement.

## **11. International considerations**

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### **11.1 If you are outside Canada**

MindBank operates from Canada, and our services are governed by Canadian law. If you are outside Canada and choose to interact with us, your information will be transferred to and stored in Canada. By using our services, you consent to this transfer.

### **11.2 Cross-border data requests**

We do not voluntarily share information with foreign governments. If a foreign government requests information about a Canadian resident, we will refuse and notify the affected person, except where such notification is legally prohibited.

## 12. Changes to this policy

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We update this policy when:

- Our practices change
- Legal requirements change
- We identify a clarification that would help readers
- An incident or near-miss reveals a gap

When we make a material change:

- We update the version number and "last reviewed" date
- We notify all current contributors and subscribers by email
- We post a prominent notice on the website for 30 days
- We document the change in the change log

We do not retroactively apply new terms to information collected under prior versions without consent.

### Change log

- April 2026 — Version 1.0: Initial policy.

## 13. Contacting us

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### Privacy questions and requests

Privacy Officer (Stephanie Atwood) [privacy@mindbank.ca](mailto:privacy@mindbank.ca)

### General inquiries

[hello@mindbank.ca](mailto:hello@mindbank.ca)

### By mail

ElevateHER Mental Health Support Services Canada

69 Brunswick Street

Truro, Nova Scotia B2N 2G8

Canada

### By phone

(902) 814-7883

### To file a complaint with the federal regulator

Office of the Privacy Commissioner of Canada [priv.gc.ca](http://priv.gc.ca) · 1-800-282-1376

A NOTE FROM THE PRIVACY OFFICER

# Privacy is a *daily practice*.

A privacy policy is only as strong as the practices behind it. Every commitment in this document is one we are operationalizing through the Data Protection & Security Policy, the Operating Framework, and the technical infrastructure of the platform itself.

If you read something here that we are not living up to in practice, tell me. Privacy is not a document — it is a daily practice. The document just makes the practice answerable.

— *Stephanie Atwood, Privacy Officer*