NIIPAAWI STRATEGIES

Niipaawi Circle Privacy Policy

Niipaawi Strategies | Effective October 9, 2026

Niipaawi Circle is a membership service offered by Niipaawi Strategies and powered by Niipaawi Strategies and Politraq. Our work is built on relationships, and trust is at the centre of every one of them. This policy explains, in plain language, what personal information we collect through Niipaawi Circle, why we collect it, how we use and protect it, and the choices and rights you have.

In this policy, “Niipaawi,” “we,” “us” and “our” mean Niipaawi Strategies. “You” means a member, prospective member, member organization representative, event participant or anyone else who interacts with Niipaawi Circle.

1. What this policy covers

This policy applies to personal information we collect through Niipaawi Circle, including:

- membership sign-up, renewals and account management;
- the Niipaawi Circle online platform, member portal, alerts, briefings and other digital tools;
- member events, roundtables, webinars and briefing sessions, whether online or in person;
- emails, calls, meetings and other communications with our team; and
- third-party platforms we use to deliver the service, including the technology provided by Politraq.

Some members or member organizations may have a separate written agreement with us. Where that agreement sets out stronger privacy or confidentiality terms, those terms apply alongside this policy.

2. Information we collect

We only collect the information we need to provide and improve Niipaawi Circle. Depending on how you engage with us, this may include:

Contact and membership information

- your name, job title, organization, email address, phone number and mailing address;
- membership type, start and renewal dates, and the people authorized on your organization’s account; and
- your login credentials and account settings.

Professional and interest information

- the policy areas, sectors, regions, governments, departments or files you ask us to follow;
- your alert, newsletter and briefing preferences; and
- questions, requests or information you share with us so we can support your work.

Billing information

- billing contact details, invoices, payment history and records needed for accounting and tax purposes.

Event information

- registration details, attendance, dietary or accessibility needs you choose to share, and feedback you provide.

Platform, website and device information

- how you use the platform, such as pages viewed, searches, saved items, alerts opened and features used;
- technical information such as your IP address, browser type, device type, approximate location and login times; and
- information collected through cookies and similar technologies (see section 15).

We do not ask for sensitive personal information, such as health information, unless it is needed for a specific reason, such as arranging an accommodation for an event. When we do, we will explain why and ask for your consent.

3. Information about other people

If you give us information about someone else, such as a colleague you want added to your organization's membership, you confirm that you have their permission or the authority to share it, and that they know it will be handled under this policy.

4. Where we get information

Most of the information we hold comes directly from you. We may also receive information from your organization (for example, when it adds you as an authorized user), from our service providers and technology partners, including Politraq, and from publicly available sources, such as an organization's website or public lobbying registries, where the law allows.

5. How we use your information

We use personal information to:

- set up, manage and renew memberships and member accounts;
- deliver the Niipaawi Circle service, including alerts, monitoring, briefings, analysis and member resources tailored to your interests;
- plan and host member events and briefing sessions;
- communicate with you about your membership, the service and related opportunities;
- process invoices and payments, and keep proper financial and business records;
- understand how members use the service so we can improve it;
- keep our platform, systems and members' information secure; and
- meet our legal, regulatory and accounting obligations.

We will not use your personal information for a new purpose without telling you and, where required, getting your consent.

6. Your consent

We collect, use and share personal information with your consent, except where the law allows or requires otherwise. Depending on the situation, your consent may be express (for example, ticking a box or signing up) or implied (for example, providing your email address so we can send you your member briefings).

You can withdraw your consent at any time, subject to legal or contractual limits, by contacting us using the details in section 23. If you withdraw consent to a use that is necessary to deliver the service, we may not be able to continue providing some or all of your membership benefits. We will explain what that means before you decide.

7. Emails and member updates

As a member, you will receive service messages, such as alerts you have set up, briefings, account notices, invoices and event logistics. These are part of the service you have signed up for.

We will only send you promotional messages, such as news about other Niipaawi services, where we have your consent or are otherwise permitted under Canada's Anti-Spam Legislation. Every promotional email includes a simple way to unsubscribe.

8. Member events and recordings

We may take photos, video or recordings at member events, roundtables and webinars. We will let you know in advance when this will happen and how the material may be used. If you would prefer not to be photographed or recorded, please tell us before or at the start of the event and we will do our best to respect your wishes.

Many member sessions involve candid discussion. Unless we say otherwise in advance, we do not publicly attribute comments made during member-only sessions to a named individual or organization.

9. Respecting Indigenous data sovereignty

Niipaawi works alongside First Nations, Inuit and Métis governments, organizations and communities. We recognize that Indigenous Peoples have the right to govern information about their communities, members, lands and knowledge.

Where a First Nation, Inuit or Métis member or partner shares information with us through Niipaawi Circle, that information remains theirs. We use it only for the purposes agreed with them, we do not claim ownership of it, and we follow any data governance protocols or agreements we have made with them, including protocols informed by principles such as OCAP® (ownership, control, access and possession).

10. Keeping your membership confidential

Government relations work depends on discretion. We treat the fact of your membership, and the issues and files you ask us to follow, as confidential. We will not publicly identify you or your organization as a Niipaawi Circle member, or share your areas of interest with other members, without your permission.

We may use combined, de-identified information, such as the number of members following a given policy area, to understand trends and improve the service. This information does not identify you or your organization.

11. Payments

Membership payments may be processed by third-party payment providers. When you pay online, your payment card details are handled directly by the payment provider under its own privacy and security practices. We do not store full payment card numbers.

12. Who we share information with

We do not sell or rent your personal information. We only share it as described below, and only as much as is needed.

- **Politraq.** Niipaawi Circle is powered in part by Politraq's technology platform. Politraq processes member account and platform usage information on our behalf so the service can operate.
- **Service providers.** We work with trusted providers for things like website and platform hosting, email delivery, event registration, video conferencing, payment processing, accounting and IT support.
- **Professional advisers.** We may share information with our lawyers, accountants, auditors and insurers where needed.
- **Legal requirements.** We may disclose information where required or permitted by law, such as in response to a valid court order, or to protect the rights, safety or security of our members, our team or others.
- **Business changes.** If Niipaawi Strategies is involved in a merger, sale or similar business transaction, personal information may be transferred as part of that transaction, subject to appropriate protections.

We expect anyone we share personal information with to protect it, to use it only for the purpose we have provided it for, and to follow applicable privacy laws.

13. Where your information is stored

We and our service providers, including Politraq, may store or process personal information in other provinces or outside Canada. When information is held outside Canada, it is subject to the laws of that country and may be accessible to its courts, law enforcement or national security authorities. We take reasonable steps to make sure your information receives a comparable level of protection wherever it is held.

14. How long we keep your information

We keep personal information only as long as we need it for the purposes described in this policy, or as long as the law requires (for example, for tax and accounting records). When it is no longer needed, we securely destroy or delete it, or de-identify it so it can no longer be linked to you.

15. Cookies and similar technologies

Our website and the Niipaawi Circle platform use cookies and similar technologies. Some are essential so you can log in and use the service securely. Others help us understand how the platform is used so we can improve it. You can control or delete non-essential cookies through your browser settings or, where available, our cookie preferences tool. Blocking essential cookies may prevent parts of the platform from working.

16. How we protect your information

We use reasonable administrative, technical and physical safeguards to protect personal information from loss, theft and unauthorized access, use or disclosure. These include access controls, password protection, secure systems and limiting access to the people who need it to do their work. No system is perfectly secure, so please also keep your own login details private and tell us right away if you think your account has been compromised.

17. If a privacy breach happens

If a privacy breach occurs, we will act quickly to contain it and reduce any harm. Where the law requires, we will notify the people affected and report the breach to the Office of the Privacy Commissioner of Canada, and we will keep a record of the breach.

18. Accessing and correcting your information

You have the right to ask what personal information we hold about you, how it has been used and who it has been shared with. You can also ask us to correct information that is inaccurate or incomplete.

To make a request, contact us using the details in section 23. We may need to confirm your identity before responding. We will respond within the time required by law, generally within 30 days. In some limited cases the law allows or requires us to refuse access; if that happens, we will explain why.

19. Young people

Niipaawi Circle is a professional membership service intended for adults and organizations. It is not directed at people under the age of 18, and we do not knowingly collect their personal information through the service.

20. Links and third-party platforms

Niipaawi Circle may link to, or share content from, other websites and platforms, such as government sites, news sources and social media. We are not responsible for the privacy practices of those third parties, and we encourage you to read their privacy policies.

21. Changes to this policy

We may update this policy from time to time to reflect changes to the service, our practices or the law. The most recent version will always be available on our website and through the Niipaawi Circle platform, with its effective date. If we make a significant change, we will let members know by email or through the platform.

22. How this policy is read

This policy is meant to be read together with any membership terms or agreements that apply to you. If anything in this policy conflicts with applicable privacy law, the law will apply.

23. Contact us

If you have questions, concerns or requests about this policy or how we handle your personal information, please contact our Privacy Officer. We would be glad to hear from you.

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