

**SILVER SPRINGS PRESCHOOL
EMPLOYEE AND VOLUNTEER PRIVACY POLICY**

At the Silver Springs Preschool (the "Preschool") we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that we collect from or about you, how we use and to whom we disclose that information.

This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

The Preschool has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to the personal information of all individuals who seek to be, are or were employed by or volunteered with the Preschool (collectively, an "employee" or "volunteer", as the case may be). For all other individuals, please see our "*External Privacy Policy*" or our "*Website Privacy Policy*" for activities related to our websites.

If you are unsure of which Privacy Policy applies to you, please contact our Privacy Officer for more information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

What Personal Information do we Collect?

We collect and maintain different types of personal information in respect of our employees and volunteers, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs and videos;
- offer letters and employment contracts;
- payroll information forms; including but not limited to social insurance number, and pay cheque deposit information;
- wage and benefit information forms; and
- beneficiary and emergency contact information forms.

In addition to the information contained in the examples listed above, we may also collect identification information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, and any other information that is voluntarily disclosed by you.

As a general rule, the Preschool collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such source (such

permission may be given directly by you, or implied from your actions, such as, for example, when you provide a name of a reference on your resume).

Why Do We Collect Personal Information?

The personal information collected is used and disclosed so that we may conduct our activities, including operating our school, and so that we may establish, manage or terminate your employment or volunteer relationship with us. Such uses and disclosures include:

- determining eligibility for initial employment/volunteering, including the verification of references and qualifications;
- administering pay and benefits;
- processing work-related claims (e.g. workers' compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment laws;
- compiling directories and telephone lists; and
- conducting criminal record checks and/or confirming status of driver's license, where appropriate.

Monitoring

The work product of the Preschool's employees and volunteers, whether in paper record, computer files, or in any other storage format belongs to us, and that work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the Preschool.

In the course of conducting our business, we may monitor employee and volunteer activities (including internet usage, and e-mail) and our property. This is not meant to suggest that all employees or volunteers will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring *may* occur and *may* result in the collection of personal information from you. When using Preschool equipment or resources, employees and volunteers should not have any expectation of privacy with respect to their use of such equipment or resources.

How Do We Use and Disclose Your Personal Information?

We may use or disclose your personal information:

- for the purposes described in this Privacy Policy; or
- for any additional purposes that we advise you of, and where your consent is required by law, we have obtained your consent.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We may share your personal information with our employees, volunteers, contractors, consultants and other parties who require such information to assist us with managing our relationship with you, including: third parties that provide services to us or on our behalf (e.g. external payroll processing).

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- to protect the rights and property of the Preschool;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- where required by law, with your consent.

Notification and Consent

The privacy legislation does not generally require the Preschool to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment or volunteer relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

Where your consent is required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

How is Your Personal Information Protected?

The Preschool endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure. Resumes, information regarding salaries, benefits, work-related claims, emergency contacts, criminal record checks and driver's license checks (if applicable) are stored in the Silver Springs Community Centre Office, and the Chair, Co-Chair and Treasurer have access to these records. Other Personal Information is stored and destroyed according to PSAC guidelines (Chairperson, Registrar, Co-Registrar & Treasurer keep files for 5 years, all other PSAC Board Members 2 years. All files will be shredded when destroyed.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment or volunteer relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with your personal information. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy, ensure compliance with privacy laws, and to respond to requests by individuals for access or correction of their personal information. The Privacy Officer is also responsible for developing and updating privacy policies, and addressing training and awareness requirements. The contact information for our Privacy Officer is as follows:

Privacy Officer: Cydney Elofson
Phone: c/o Silver Springs Preschool
Email: ssps.privacyofficer@shaw.ca

Revisions to this Privacy Policy

The Preschool, may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. This Privacy Policy was last updated on March 11, 2008.

Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word “including” is used, it shall mean “including without limitation.”

This Privacy Policy does not create or confer upon any individual any rights, or impose upon the Preschool any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.