

## **SILVER SPRINGS PRESCHOOL EXTERNAL 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, unless the personal information is related to our websites (such information is dealt with in our "*Website Privacy Policy*") or is related to an individual who seeks to be, is or was employed by or volunteered with the Preschool (such information is dealt with in the Preschool "*Employee and Volunteer Privacy Policy*").

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 regarding of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- school registration information, such as your or your child's name, and birthdate;
- application information such as, child's previous report cards, assessment information and previous school records;
- extracurricular registration information, such as your or your child's preferences and interests;
- emergency medical information, such as your child's allergies or other medical conditions that you believe are important for the Preschool staff to know about;
- product and service related information concerning the products and services that we provide to, or receive from, you;
- your comments, suggestions and feed-back and any other information requested by or provided to 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 sources (such permission may be given directly by you, or implied from your actions).

## **Why Do We Collect Personal Information?**

The Preschool collects personal information to enable us to manage, maintain, develop and conduct our activities, including operating our school, including:

- to establish, maintain and manage our relationship with you and your child;
- to be able to review our operations so that we may understand your requirements and expectations of Silver Springs Pre-School and so that we may work to meet or exceed those requirements and expectations;
- to properly respond to medical emergencies;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

## **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; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

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, 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.

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
- with your consent.

## **Your Consent is Important to Us**

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

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

## **Choice/Opt-Out**

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

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.

## **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. Personal information of children enrolled in our programs and their parents will be stored in a locked filing cabinet in the Preschool classroom. The classroom itself is locked when not in use, and the Silver Springs Community Centre is locked and alarmed when not in use. Personal information will be accessible to the Preschool registrars, Preschool teachers and teachers' assistants. In addition the names and addresses of children enrolled in the Preschool programs and their parents will be stored on the home computers of the registrar(s) and co-chair and will be used for the purpose of creating mail-out labels. These computers are password-protected and the homes are locked when not in use. The information regarding children enrolled in the Preschool's programs and their parents will be deleted at the end of the School year, except in cases where registrars or co-registrars remain in their roles for the following year.

## **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 our 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 286-3170  
Email: [ssps.privacyofficer@shaw.ca](mailto: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.