

Protecting Your Privacy

SMS Personal Information Privacy Policy

Safeguarding personal information of parents and students is a fundamental concern of SMS. The school is committed to meeting or exceeding the privacy standards established by the Personal Information Protection and Electronic Documents Act (PIPEDA).

This Personal Information Privacy Policy describes our policies and practices regarding the collection, use, and disclosure of students' and parents' personal information, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

SMS may add, modify, or remove portions of this Personal Information Privacy Policy when it is considered appropriate to do so, and any such changes will be effective upon giving notice of the revised policy. You may ask for the most recent update of this Personal Information Privacy Policy at the school office. This Personal Information Privacy Policy may be supplemented or modified by agreements entered into between SMS and an individual from time to time.

Ten Privacy Principles

As part of SMS's commitment, the ten privacy principles govern the actions of the school as they relate to the use of personal information. This Personal Information Privacy Policy describes the ten privacy principles and provides further details regarding the school's compliance with the principles.

Definitions

In this Personal Information Privacy Policy, the following terms have the meanings set out below:

- "Personal information" means any information about an identifiable individual, as further defined under the PIPEDA or other applicable laws. Personal information excludes the name, position name or title, business telephone number, business address, business e-mail, and business fax number of an individual, as well as any publicly available information as designated under applicable laws, such as information available from a public telephone directory or from a public registry.
- "Parent" means the parent, guardian, or other legal representative of a student.
- "Student" means a prospective, current, or past student of SMS.

Principle 1: Accountability

SMS is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates individuals who are accountable for the school's

compliance with the ten privacy principles. Cynthia Bradshaw and Catherine Wyman are the Privacy Officers of the school.

You may contact our Privacy Officers as follows:

Sunshine Montessori School
Attention: Privacy Officers
10 Boniface Avenue
Kitchener, Ontario N2C 1L9
Phone: (519) 744-1423
Admin@smsschool.ca

Principle 2: Identifying Purposes

SMS will identify, before or at the time personal information is collected, the purposes for which the information is collected, used, and disclosed. SMS collects and uses personal information to provide students with the best possible educational services as outlined in our mission statement. We collect, use, and disclose Personal Information concerning our students, their parents, and alumnae for the following reasons:

- to assist in communicating with the students and parents (this would include, without limitation, administering tests, evaluation and accreditation, contacting students and parents about upcoming events and activities, and collecting information to assist us in carrying on our activities);
- to assist in communicating with and maintaining contact with our alumnae (this would include, without limitation, providing information about upcoming events and activities, and collecting information to assist us in carrying on our activities);
- for maintaining student file;
- for medical emergency reasons.

Principle 3: Consent

SMS will obtain consent of the individual for the collection, use, or disclosure of personal information except where the law states exemptions, grants permission, or creates a requirement for collection, use, or disclosure of personal information.

Requirements for consent to collect, use, or disclose personal information vary depending on circumstances and on the type of personal information that is to be collected, used, or disclosed. In determining whether consent is required and, if so, what form of consent is appropriate, SMS will consider both the sensitivity of the personal information and the purposes for which the school will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate) or deemed. For example, if an individual provides his or her mailing address and requests information regarding a particular service, consent to use the address to provide the requested information may be implied.

On giving reasonable written notice to the school, an individual may withdraw consent to the collection, use, or disclosure of his or her personal information. Upon notice of withdrawal of consent, we will notify the individual of the likely consequences of withdrawing his or her consent and, except where otherwise required or permitted by law, SMS will stop collecting, using, or disclosing the personal information as requested.

If a person provides SMS or its service providers or agents with personal information about an individual, the person represents that he or she has all necessary authority and/or has obtained all necessary consents from such individual to enable the school to collect, use, and disclose such personal information for the purposes set forth in this Personal Information Privacy Policy.

Principle 4: Limiting Collection

SMS will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5: Use, Disclosure, and Retention

SMS will only use, disclose, and retain personal information for the purpose for which it was collected unless the individual has otherwise consented, or when its use, disclosure, or retention is required or permitted by law.

If for any reason personal information is required to fulfill another purpose, the school will, where appropriate, notify the individual and ask for consent before proceeding.

SMS may use anonymous information, such as information collected through surveys or statistical information regarding students, to improve our school.

SMS may disclose an individual's personal information to others in connection with the purpose for which it was collected, as consented to by the individual, or as required or permitted by law.

Personal information will be retained only for the period of time required to fulfill the purpose for which it was collected. Once the personal information is no longer required to be retained to fulfill the purposes for which it was collected and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

Principle 6: Accuracy

SMS will take appropriate steps to ensure that personal information collected is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used, or disclosed.

Principle 7: Safeguarding Personal Information

SMS will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

The School's Employees

In the course of daily operations, access to personal information is restricted to authorized employees who have a legitimate reason for accessing it. For example, teachers will have access to personal information about students but not the family's account with the school.

Employees are appropriately educated about the importance of privacy and they are required to follow the school's policies and procedures regarding handling of personal information.

Student Files

Student files are stored in secured filing cabinets. Access is restricted to only those employees who, by nature of their work, are required to see them (teachers, teacher-aides, counsellors, secretaries, etc.).

SMS will exchange personal information with the Ontario Ministry of Education in order to assign, update, and validate the Ontario Education Number and the personal information associated with them.

Electronic Security

The school manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The school's security practices are reviewed periodically to ensure that the privacy of personal information is not compromised.

Principle 8: Openness

SMS will make information available to individuals concerning the policies and practices that apply to the management of personal information.

Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officers.

Principle 9: Individual Access

SMS will inform an individual, upon the individual's request, of the existence, use, and disclosure of his or her personal information, and shall give the individual access to it in accordance with the law.

Access to Personal Information

Individuals may access and verify any personal information with appropriate written notice so that the office is able to supply the information required. Most of this information is obtained from the registration or other forms individuals would have filled out.

Parent Access to Student Information

Parents may access and verify school records of their child/ren, with appropriate written notice, during normal school hours. In situations of family breakdown, the school will grant access to student records in accordance with the law.

SMS may exercise its right to deny access to some information where the disclosure of information may threaten someone else's safety, mental or physical health, or where disclosure could be harmful to the personal privacy of a third party.

Principle 10: Complaint Process

Individuals may question compliance with the above principles.

Questions, Concerns, and Complaints

Questions, concerns, and complaints about privacy, confidentiality, and the school's policies and practices of handling personal information should be directed to the Privacy Officers.