

BRAEMAR HOUSE SCHOOL
POLICIES AND PROCEDURES

15.18 PRIVACY POLICY

BACKGROUND

Braemar House School (“**Braemar**”) is committed to protecting the privacy of our community, including students, staff, parents and other constituents and is committed to protecting their privacy through our compliance with this privacy policy (the “**Privacy Policy**”). Braemar has developed policies and procedures consistent with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and other applicable privacy

REFERENCES

PIPEDA (Personal Information and Protection and Electronic Documents Act
Personal Health Information Protection Act
Child, Youth and Family Services Act
Canadian Anti-Spam Legislation

EFFECTIVE DATE AND SCOPE

This Privacy Policy is effective as of February 23, 2022.

This Privacy Policy governs our practices to the collection, use and disclosure of Personal Information (as defined below) that we collect from prospective, current and past students and their families; staff, vendors, donors, volunteers, website visitors and other individuals connected to the school.

ACCOUNTABILITY

Braemar is responsible for the Personal Information under our possession and control. We have designated the Executive Director for Braemar House School to be our Chief Policy Officer who will be responsible for our compliance with this Privacy Policy and applicable privacy legislation.

Braemar is responsible for Personal Information in its possession or custody, including information that has been transferred to a third, party for processing. Braemar shall use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

Braemar shall implement policies and practices to give effect to these principles, including:

- implementing procedures to protect Personal Information;
- establishing procedures to receive and respond to complaints and inquiries;
- training staff and communicating to staff information about the organization’s policies and practices; and
- developing information to explain the organization’s policies and procedures.

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DEFINITIONS

To better understand this Privacy Policy, Braemar has set out some basic definitions to use when reading and interpreting it.

- *Collection*: the act of gathering, acquiring, recording, or obtaining Personal Information from any source, including third parties, by any means.
- *Consent*: voluntary agreement to the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied.
- *Disclosure*: making Personal Information available to a third party for that party's own use.
- *Personal Information*: information about an identifiable individual that is recorded in any form but does not include aggregated information or depersonalized that cannot be associated with a User.
- *Transfer*: making Personal Information available to a third party for processing, storage or otherwise, solely to be used on behalf of Braemar.
- *Use*: the treatment, handling, and management of Personal Information by and within Braemar.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal Information that Braemar collects and produces includes, but is not limited to:

- Names, date of birth, addresses, telephone numbers, e-mail addresses, marital status, custody status, and other contact/family details;
- Admissions application information;
- Academic information such as attendance, grades, progress reports etc., and information about special educational needs
- Information needed to support students and staff such as health and medical information and social insurance number;
- Information relating to Before and After School Program and extra-curricular activities;
- Employment data;
- Images, audio, and video recordings;
- Financial information;
- Courses, meetings, or events attended;
- Website visitor information; and
- Reference check information.

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HOW DO WE USE YOUR PERSONAL INFORMATION?

Braemar uses Personal Information to support our academic and business operations, including for:

- Selection and admission of students;
- Teaching and evaluating students, monitoring their progress and providing them with individualized academic and other support as appropriate;
- To accommodate students with particular educational needs;
- To communicate with current, former, and prospective students and their families about Braemar events and activities, volunteer opportunities, and fundraising efforts;
- To administer our programs and extracurricular events, such as the Before the After School Program;
- Staff administration including recruitment of staff, administration of payroll, review and appraisal of staff and staff performance, conduct of any grievance, capability or disciplinary procedures; the maintenance of appropriate human resources records for current and former staff; and providing references;
- Promotion of Braemar through its own website and other publications and communications (including through social media channels); and
- Maintaining relationships with alumni and the school community by communicating with the students and families and organising events.

HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

We retain Personal Information for as long as necessary to fulfill the purposes for which we collected the information or as required by law. We maintain a records retention and destruction program to destroy information when it is no longer needed or required.

CONSENT

We respect your privacy and, unless otherwise required by law, we will not collect, use, transfer or disclose your Personal Information without your prior consent. Your consent may be expressed or implied. You may expressly give your consent in writing, verbally or through any electronic means. In certain circumstances, your consent may be implied by your actions. The form of consent sought by Braemar may vary, depending upon the circumstances and type of information disclosed. In determining the appropriate form of consent, Braemar shall consider the sensitivity of the Personal Information and the reasonable expectations of the individual. Braemar will seek express consent when the information is likely to be considered sensitive. Implied consent will generally be appropriate where the information is less sensitive.

Where it is necessary to collect Personal Information from other parties, the consent of the person or family involved will be obtained.

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Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting us at the contact information set forth below. If you refuse or withdraw your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

LIMITING COLLECTION

When collecting Personal Information, Braemar will limit the collection of Personal Information to that which is necessary to fulfill the purposes identified in this Privacy Policy. Braemar will be open and transparent about the information that is being collected by communicating the purpose of collection.

DO WE DISCLOSE OR TRANFER YOUR PERSONAL INFORMATION TO OTHERS?

Braemar will maintain the strict confidentiality of all Personal Information collected and will not sell, transfer or otherwise disclose any of your Personal Information to any third party without your knowledge and consent except for the purposes outlined in this Privacy Policy.

We may share Personal Information with our service providers that provide services to Braemar, such as e-learning platforms, educational trip providers, consultants, and communication service providers. In such cases, Braemar will disclose only the Personal Information necessary for the provision of the service.

Only Braemar's and our service provider's employees with a business need to know, or whose duties reasonably so require, are granted access to Personal Information that we are accountable for. All such employees will be required as a condition of employment to contractually respect the confidentiality of the Personal Information.

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of our business or as part of a corporate reorganization or other change in corporate control.

We will disclose Personal Information without an individual's knowledge or consent if we receive an order, subpoena, warrant or other legal requirement issued by a court, tribunal, regulator, or other person with jurisdiction to compel disclosure of Personal Information. Otherwise, Braemar will only disclose Personal Information to third parties with the permission of the person or family concerned

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WHAT INFORMATION WILL WE SHARE BETWEEN PARENTS/GUARDIANS?

Unless restricted by law or contract, Braemar [upon request by a parent] will share all Personal Information of a student produced or collected by Braemar pursuant to his or her enrolment at Braemar. For example, we will share academic information and student health information with all parents and/or guardians.

We will not share Personal Information of one parent or guardian with another parent or guardian unless that parent consents to such disclosure.

SECURITY AND PROTECTION OF PERSONAL INFORMATION

We have implemented administrative, technical, and physical measures to safeguard Personal Information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access of Personal Information. This includes:

- utilizing access controls and firewall controls of computer servers;
- limiting access of employees to, and the use of, Personal Information through the use of passwords and graduated levels of clearance;
- the use of pseudonymization and encryption of Personal Information, where appropriate;
- measures to ensure the ongoing confidentiality, integrity, availability and resilience of its systems and services; and
- regularly monitoring and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing of Personal Information.

HOW MAY I ACCESS AND MODIFY MY PERSONAL INFORMATION OR MAKE A COMPLAINT?

Upon request, Braemar will make available to a person or family, on request, the Personal Information on file on that person with due concern for the protection of the privacy of its source, subject to any legal or ethical prohibition or privilege. The person or family concerned with the Personal Information on file with Braemar will have the opportunity to request corrections or clarification of the information

An individual can make inquiries and/or address a challenge concerning compliance with this Privacy Policy to Braemar's Chief Privacy Officer.

Braemar will maintain procedures for addressing and responding to all inquiries or complaints about Braemar handling of Personal Information. Braemar shall investigate all complaints. All inquiries or complaints involving Braemar's handling of Personal Information or compliance with this Privacy Policy shall be directed to Braemar's Chief Privacy Officer.

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Braemar will respond to all such inquiries or complaints within 14 business days of receipt. Braemar will make reasonable efforts to resolve all such complaints within 30 days of receipt of the initial complaint. If Braemar finds a complaint to be justified, it will take appropriate measures, including, if necessary, amending its policies and procedures.

For more information, please contact Braemar's Chief Privacy Office as follows:

E-mail: director@braemarhouseschool.ca

Mail:

Braemar House School
Chief Privacy Officer
36 Baxter St, Brantford, ON
N3R 2V8

LINKS TO OTHER SITES

Our website may contain links to other sites that are independently owned and operated by third parties. These other sites may have their own privacy policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any sites owned and operated by any third parties. Other sites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy of each site you visit.

GENERAL

Braemar has the right to modify and amend this Privacy Policy from time to time in its sole discretion without prior notice to clarify our practices and to reflect new or different privacy practices. Any such amendment(s) will be posted on our website and will be effective as of the date of posting. If we make any material changes, we will notify you by e-mail (sent to the e-mail address specified in your account, if any). You can determine when this Privacy Policy was last revised by referring to the version date listed above.

***Reviewed and Approved by
Board of Directors
February 2022***