

PRIVACY POLICY

Approval Date:	February 24 th , 2021
Revision Date :	

Privacy of personal information is an important principle to the Balmy Beach Community Day Care Centre (the Centre). We are committed to protecting the privacy of our employees, placement students, volunteers, clients, and the children in our care.

DEFINITION OF PERSONAL INFORMATION

Personal information is information about an identifiable individual. Personal information includes but is not limited to information that relates to their personal characteristics, (e.g., gender, age, income/financial status, home address or phone number, social insurance number,), their health, (e.g., health card number, immunization record), banking information, or their activities and views, (e.g., opinions expressed by an individual). Personal information regarding employees includes their income, employment history, vulnerable sector record, work performance, and any allegations, investigations, or findings of wrongdoing, misconduct, or discipline.

The Centre may collect all of the above personal information.

INFORMATION NOT CONSIDERED CONFIDENTIAL

The name, position, business telephone number, and business email address of employees; and the name and position on the Board of Directors (Board) of current Board members.

HOW PERSONAL INFORMATION IS COLLECTED

The Centre may ask employees, placement students, volunteers, clients and families to provide personal information from time to time. This information may be collected in a hard copy format, digitally or verbally.

You may provide us with your health card number if you wish.

HOW PERSONAL INFORMATION IS USED

The Centre collects, uses and discloses personal information of its employees, placement students, volunteers, clients and families for the purpose of providing childcare services and administering the Centre, and for no other purpose. The Centre may also use your personal information to contact you as may be required.

The Supervisor and Assistant Supervisor may view health information such as immunization records only for the purpose of ensuring that these records are up to date as required by law.

The Centre will obtain your consent if it seeks to collect, use or disclose your personal information for purposes other than those to which you have consented, unless otherwise permitted by law.

SECURITY IN PROTECTING PERSONAL INFORMATION

The Centre uses the following safeguards to protect your personal information against loss, theft, unauthorized access, copying or destruction:

- All hard copies of personal information are physically secured from access by unauthorized persons in locked filing cabinets, which are only accessible to the Supervisor and Assistant Supervisor. Filing cabinets are locked when not in use.
- Any staff accessing the cabinet must be accompanied by the Supervisor or Assistant Supervisor and must sign out any hard copies of personal information. Such staff must keep the personal information under constant supervision until it is returned to the locked cabinet.
- Hard copies of personal information are transmitted using sealed and addressed envelopes
- Electronic copies of personal information are stored on a computer and an external hard drive which are physically secured from access by unauthorized persons in locked filing cabinets. The locked filing cabinets are only accessible to the Supervisor and Assistant Supervisor. Filing cabinets are locked when not in use.
- The computer and hard drive may only be accessed through a password, which is changed every three months.
- Electronic copies of personal information stored on the computer are backed up every evening at the same time to an external hard drive onsite.
- All personal information stored in electronic format is password protected when transferred.
- Antivirus and antimalware software are installed and kept up to date.
- Any third-party service providers who access personal information are contractually required to keep confidential any personal information they receive from the Centre.
- Employees are trained to collect, use, and disclose personal information only as necessary to fulfill their duties and in accordance with this Privacy Policy. Employees who breach this Privacy Policy may be subject to discipline and or termination.

THE CENTRE MAY DISCLOSE PERSONAL INFORMATION

On a need-to-know basis, the Centre discloses personal information to the Supervisor, Assistant Supervisor and staff for the purpose of providing programming, and to the Supervisor, Assistant Supervisor, Board members and staff for the purpose of administering the Centre.

Artwork and photos of children and/or their families may be displayed at the Centre. Artwork and photos are identified by the child's first name only. As we share facilities with Balmy Beach Community School, teachers, students and parents at the school may see such photos and artwork.

The Centre may also disclose personal information to its third-party services providers in order to operate and administer the Centre. The Centre's service providers are currently the following:

- **DYL Accounting & Tax Service**, who collects, uses and discloses personal information with its privacy policy which can be obtained by emailing Dorislaw.cpa@gmail.com.
- **Penny Legion/Chung LLP, Chartered Professional Accountants**, who collects, uses and discloses personal information with its privacy policy which can be obtained by emailing Brendan@pcaudit.ca.
- **Manulife Financial and Marsh Canada Limited, Insurance providers**, who collects, uses and discloses personal information with the privacy policy available here: www.manulife.ca
www.marsh.com
- **Ceridian Canada, Payroll Service**, who collects, uses and discloses personal information with the privacy policy available here: www.ceridian.com/ca/products/powerpay
- **Ian Werker, Barrister & Solicitor – Employment and Labour Law**, who collects, uses and discloses personal information with his privacy policy which can be obtained by emailing **The Toronto District School Board** (with respect to information pertaining to shared students), who collects, who uses and discloses personal information with the privacy policy available here: [Freedom of Information & Privacy \(tdsb.on.ca\)](http://www.tdsb.on.ca)

The Centre may, add, change or remove a service provider at any time and without notice. If it does so, the Centre will use reasonable efforts to update this Privacy Policy promptly.

In addition, the Centre may disclose personal information:

- as required by law;
- as required by a court order, and/or subpoena in the case of a legal/custody dispute;
- to Toronto Police Services;
- to the Children's Aid Society;
- to Toronto Public Health;
- to the Ministry of Education, Child Care Division;
- to the City of Toronto, Children's Services; and
- As required under the Child Care and Early Years Act and its associated regulations.

The Centre may also disclose immunization records as required by law to demonstrate that they are up to date. The Centre may disclose health card numbers to a health care provider if required to obtain emergency health care and the parent or guardian of a child cannot be reached or otherwise is unable to provide it.

Finally, the Centre may disclose personal information with the individual's consent.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

The Centre needs to retain personal information long enough to ensure that it can answer any questions brought to it regarding the services provided and for its own accountability to external regulatory and legislative bodies.

The Centre keeps client files for three years following termination of the client relationship. Financial records are kept for seven years. Employee files are kept for three 3 years after termination of employment.

The Centre securely destroys personal information as follows:

- Paper files that contain personal information are destroyed through secure shredding;
- Electronic information is destroyed by deleting it from the storage medium; and
- When a computer is discarded, the hard drive is securely formatted or physically destroyed to permanently render inaccessible any information contained within it.

Electronic data stored on archival records that are not accessible in the normal course may be kept indefinitely.

YOU CAN LOOK AT AND UPDATE YOUR INFORMATION

With some exceptions, employees, placement students, volunteers, clients and families have the right to see what personal information the Centre holds about them and/or their child(ren). Employees, placement students, volunteers, clients and families may make a written request for access to this personal information at any time. The Centre may charge a nominal fee for providing copies of its documents.

Employees, placement students, volunteers, clients and families may provide us with a written request to update or delete their information. Please note that deleting personal information may compromise the Centre's ability to provide childcare services or to employ the person making the request.

BREACH NOTIFICATION POLICY

If this Privacy Policy is breached, the Chief Privacy Officer will promptly investigate the cause of the breach and identify any personal information that may have been improperly accessed. The Centre will notify the owner of any such breach. The Centre will take any appropriate steps with a view to preventing further breaches.

AMENDMENTS TO PRIVACY POLICY

The Centre may modify or supplement this Privacy Policy at any time, and to apply the changed policy and practices to all personal information it holds. If the Centre makes a change to this Privacy Policy, the Centre will post such change on its website.

The Centre encourages you to review this Privacy Policy periodically.

FOR MORE INFORMATION

Christine Roberts is the Chief Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. She may be contacted as follows:

14 Pine Ave, Toronto ON M4E 1L6
Phone: 416-393-1565
E-mail: balmybeachcomday@bellnet.ca

Who can I contact for further information?

If you have any questions or concerns about our privacy practices or your personal information that remain unresolved after contacting our Chief Privacy Officer, you may contact Canada's Information and Privacy Commissioner at:

Information and Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376
Phone: (819) 994-5444
TTY: (819) 994-659