

# **PRIVACY POLICY**

Waterloo Infant Toddler Daycare Association recognizes the importance of privacy and the sensitivity of personal information for all our families. For these reasons we have created the following privacy policy (the "policy"). This privacy policy outlines how we manage your personal information, the uses to which your personal information is put and how we safeguard your privacy.

## **Your Privacy Rights**

From January 1, 2004 all businesses engaged in commercial activity must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to our child care centre and the act gives you, certain rights concerning the privacy of your personal information.

Waterloo Infant Toddler Daycare Association is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy and trained our staff about our policies, procedures and practices.

### **A. An Overview**

#### **1. What this Policy Covers**

This policy covers our treatment of the personal information we collect from you (the family).

This policy also covers our treatment of the personal information we collect from and about our employees and staff.

#### **2. Purposes for Collection of Personal Information**

Waterloo Infant Toddler Daycare Association collects personal information for the following limited purposes:

- a) To establish and maintain class lists
- b) To establish and maintain waiting lists
- c) To issue tax receipts
- d) To issue charitable donation receipts
- e) To mail or email out registration packages
- f) To mail or email out correspondences to past, present and future families

A secondary purpose for us to collect personal information is to complete necessary reporting documents to the Regional Municipality of Waterloo, Human Resources Development Canada, Ministry of Community Family and Children's Services, Ministry of Children and Youth Services, Canadian Customs and Revenue Canada, Ministry of Consumer and Business Services, and to the organization's insurance carrier for Liability insurance and Directors' and Officers' liability insurance.

- a. For inclusion in our news letters (first names only)
- b. To maintain the employment relationship with our employees

#### **3. How Do We Collect Your Personal Information?**

We collect information only by lawful and fair means that are not unreasonably intrusive. Wherever possible we collect your personal information from you directly at enrolment time and periodically thorough the year.

#### **4. How is Personal Information Maintained?**

We do not sell, barter, or trade your personal information to third parties, other than as identified.

We understand the importance of protecting personal information. For that reason we have taken the following steps.

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Staff are trained to collect, use, and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.

Board Members, students, volunteers and agencies with access to personal information must enter into privacy (confidentiality) agreements with us.

#### **B. Application of the Code**

Waterloo Infant Toddler Daycare Association applies the ten principles of the code as follows:

##### **1. Accountability**

Waterloo Infant Toddler Daycare Association is responsible for the personal information collected and maintained by us and which is under our control. In order to fill this responsibility:

- a) We have designated office personnel and or Supervisor to be responsible for the day-to-day care and control of personal information;
- b) Our staff oversees compliance with the terms of this policy;
- c) Waterloo Infant Toddler Daycare Association has taken the following measures to ensure compliance with this policy:
  - Developing procedures to protect personal information;
  - Developing procedures to receive and respond to complaints and inquiries;
  - Training our staff about the policies and practices respecting personal information;
  - Developing and distributing information to our staff and the general public explaining our policies and procedures respecting personal information.

##### **2. Identifying Purposes**

Waterloo Infant Toddler Daycare Association is committed to openness to you regarding the collection and use of your personal information. As discussed above we collect and use personal information for the following limited purposes:

- a) To establish and maintain class lists
- b) To establish and maintain waiting lists
- c) To issue tax receipts
- d) To issue charitable donation receipts
- e) To mail or email out registration packages

- f) To mail or email out correspondences to past, present and future families
- g) A secondary purpose for us to collect personal information is to complete necessary reporting documents to the Regional Municipality of Waterloo, Human Resources Development Canada, Ministry of Community Family and Children's Services, Ministry of Children and Youth Services, Canadian Customs and Revenue Canada, Ministry of Consumer and Business Services, and to the organization's insurance carrier for Liability insurance and Directors' and Officers' liability insurance.
- h) For inclusion in our news letters (first names only)
- i) To maintain the employment relationship with our employees

To demonstrate this openness, we require your consent prior to using their personal information for any purpose other than that for which it was originally collected.

If any individuals wish to be advised of the personal information we have in relation to them, they are advised to follow the procedure listed in Section C below.

### **3. Consent**

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally we ask you for your consent in writing but in some circumstances, we may accept your oral consent. Sometimes your consent may be implied throughout your conduct with us.

For example, it is Waterloo Infant Toddler Daycare Association position that all personal information may be collected, used and disclosed for the purposes listed in Section 2 above. If you do not wish your personal information for one such purpose please do not sign the consent on your child's enrolment form, or please contact the Waterloo Infant Toddler Daycare Association privacy officer at the address listed in Section C below.

Waterloo Infant Toddler Daycare Association will only further disclose your personal information, without notice, only in the situations described in Section 5 below.

### **4. Limiting Collection**

Waterloo Infant Toddler Daycare Association restricts the collection of personal information only to that information that is necessary for the limited purposes noted above. We are committed to collecting personal information in a fair, open and lawful manner.

For this reason, Waterloo Infant Toddler Daycare Association does not indiscriminately collect personal information. We collect personal information to fulfill the above noted purposes only, and for no other purpose.

### **5. Limiting Use, Disclosure and Retention**

Waterloo Infant Toddler Daycare Association does not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received.

Further, Waterloo Infant Toddler Daycare Association will only disclose your personal information under the following circumstances:

- When we are required or authorized by law to do so, for example if a court issues a subpoena;
- When you have consented to the disclosure;

- Where it is necessary to establish or collect fees;
- If the information is already publicly known;
- We retain personal information for as long as this information is in our computer system or on premises and will only be used for the original collected purpose or to contact families for special events and or correspondences related to WITDA.

## **6. Accuracy**

Since we use your personal information to maintain our enrolment, it is important that the information be accurate and up-to-date. If during the course of you're the year any of your information changes, please inform us of such changes and we will update our records accordingly.

You may confirm the accuracy of your personal information by contacting us in writing or by e-mailing your request to the address set out in Section C below.

## **7. Safeguards**

Waterloo Infant Toddler Daycare Association takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- Premises security;
- Restricted file access to personal information;
- Secured databases where membership information is stored;
- Hard copies of family information kept in a locked office in a locked filing cabinets.
- We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

## **8. Openness**

Waterloo Infant Toddler Daycare Association makes information about its policies and practices respecting the collection and maintenance of personal information available to all interested parties.

We are pleased to answer any questions that you may have regarding the collection and maintenance of personal information. Please forward any questions in writing or by e-mail to the address set out in Section C below.

## **9. Individual Access**

You may ask for access to any personal information, which we hold about you. However, we reserve the right to confirm the identity of the persons seeking access to personal information before complying with any requests.

Summary information is available upon request. More detailed requests, which require archival or other retrieval costs may be subject to a nominal fee.

However, your rights to access of your personal information are not absolute.

We may deny access when;

- Denial of access is required or authorized by law;
- Information relates to existing or anticipated legal proceedings;
- When granting you access would have an unreasonable impact on other people's privacy;
- To protect Waterloo Infant Toddler Daycare Association's rights and property;
- When the request is frivolous or vexatious.

If we deny your request to information we shall provide you with a written explanation for such denial by the Board of Directors and Supervisor.

## **10. Challenging Compliance**

Waterloo Infant Toddler Daycare Association has designated office personnel and or Supervisor who are responsible for the day-to-day care and control of personal information. These office personnel and or Supervisor will receive and respond to all information requests concerning our privacy policies or about your personal information under our care and control.

We investigate all complaints received by us and will respond in writing in a timely manner. If any complaint is found to be justified, then we will take the appropriate measures to respond to the matter to the satisfaction of the complainant.

## **C. How to Access or Amend Your Personal Information**

### **1. Requests for Access**

If you have any questions, or wish to access your personal information, please write to our Privacy Officer at:

Waterloo Infant Toddler Daycare Association  
 Attention: Privacy Office  
 368 Erb Street West, Waterloo, ON N2L 1W6

Phone 519-746-7510  
 Fax 519-746-8838  
 Email [Bonnie@WITDA.com](mailto:Bonnie@WITDA.com)

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street  
 Ottawa, ON  
 K1A 1H3  
 1-800-282-1376

### **2. Communicating With Us**

You should be aware that e-mail and fax are not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

## **D. Notes**

### **1. Employee Information**

This entire policy applies to all staff and employees of Waterloo Infant Toddler Daycare Association. Please be advised that employee personal information is important to us and for such reasons this policy governs all aspects of the employment relationship between the parties, including but not limited to:

Employee applications whether or not the employee is eventually hired by the Centre;

- All resumes;
- All documents, including insurance documents, found in the employee personnel file;
- The termination or severance of the employment.

## **2. Changes to This Privacy Policy**

Since Waterloo Infant Toddler Daycare Association regularly reviews all of its policies and procedures, we may change our privacy policy from time to time.