
Personal Information Protection Private Sector Privacy Legislation

Personal Information Protection Policy

Express Yourself Performing Arts

At Express Yourself, we are committed to providing our parents and students with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our parents and students, protecting their personal information is one of our highest priorities.

While we have always respected our parent's and student's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of Canada's *Personal Information Protection & Electronics Act* (PIPEDA). PIPEDA, which came into effect on January 1, 2004, sets out the ground rules for how Canada's businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our parents and students of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPEDA, outlines the principles and practices we will follow in protecting parents and student's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our parents and student's personal information and allowing our parents and student's to request access to, and correction of, their personal information.

This Personal Information Protection Policy applies to Express Yourself Performing Arts.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Express Yourself Performing Arts.

Definitions

Personal Information – means information about an identifiable *individual*.

Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email. Contact information is not covered by this policy or PIPEDA.

Privacy Officer – means the individual designated responsibility for ensuring that Express Yourself complies with this policy and PIPEDA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the parents and student's voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect parents and student's information that is necessary to fulfill the following purposes:
 - To register a client for programs within our school

Policy 2 – Consent

- 2.1 We will obtain parents and student's consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided [*when registration is processed online or over the phone*] or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the parent and/or student voluntarily provides personal information for that purpose.
- 2.3 We may collect, use or disclose personal information without the parents and student's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that puts an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose parents and student's personal information where necessary to fulfill the purposes identified at the time of collection [*or for a purpose reasonably related to those purposes such as:*
 - To conduct parents and students surveys in order to enhance the provision of our services;
 - To contact our [parents and students] directly about services that may be of interest;]
- 3.2 We will not use or disclose parents and student's personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell **parents and students** lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use **parents and students** personal information to make a decision that directly affects the **parents and students**, we will retain that personal information for at least one year so that the **parents and students** has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain **parents and students** personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that **parents and student's** personal information is accurate and complete where it may be used to make a decision about the **parents and students** or disclosed to another organization.

- 5.2 **Parents and students** may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the **parents' and students'** correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of **parents and students** personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that **parents and students** personal information is appropriately protected:

All student information is located on a central computer, which is password protected. Any financial information is also secured under username and password within the payment processing application used.
- 6.3 We will use appropriate security measures when destroying parent's and student's personal information such as shredding any printed documents, archiving (with password protection) any data on above mentioned computer.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer is responsible for ensuring Express Yourself compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Parents and student's should direct any complaints, concerns or questions regarding Express Yourself compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the parents and student's may also write to the Information and Privacy Commissioner of Canada.

Contact information for Express Yourself Performing Arts Privacy Officer:

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Express Yourself Performing Arts

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