

CHATHAM-KENT LAMBTON ADMINISTRATIVE SCHOOL SERVICES

Policy:	Privacy
Reference:	CC-PO-001-2016
Adopted:	June 22, 2016
Revised:	June 9, 2021



Policy Goal:

It is the policy of Chatham-Kent Lambton Administrative School Services (CLASS) to collect, use, retain and disclose personal information in the course of meeting its statutory duties and responsibilities and comply with the provisions of the Ontario *Education Act*, the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) and any other applicable legislation.

Policy Statement:

CLASS is committed to providing reasonable access to information by the public, while at the same time protecting personal information held in its custody and control as provided and requested by you (which includes parents, guardians, students and service providers), while also protecting your personal privacy, and any confidential information of CLASS or third parties. CLASS has enacted this Policy in furtherance of such principles. CLASS will endeavor to remain consistent with the privacy procedures and practices of its member boards.

Preamble:

CLASS is jointly and equally owned by the Lambton Kent District and the St Clair Catholic District School Boards who mutually benefit in the provision of shared services. CLASS is comprised of various business units, including Student Transportation Services, Community Use of Schools, Child Care Services and Energy & Environmental Services.

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Policy Guidelines:

1.0 Access to Information:

CLASS will respond to reasonable requests for access to information by the public, except where such request is contrary to the commitment to protect individual privacy or involves matters confidential to CLASS or third parties, or as may be required by law.

2.0 Collection of Information:

CLASS does not share, rent or trade any of your Personal Information, collected electronically or by hard copy, with third parties for their promotional purposes. Please note that this Policy does not cover aggregated data from which the identity of an individual cannot be determined.

- Personal Information: CLASS may, from time-to-time, collect personally identifiable information ("Personal Information") that you provide us, such as: your name, address, phone numbers, email addresses, etc. CLASS collects and stores information electronically for services provided, but also collects paper or hard copies of information in some instances. CLASS may collect information electronically about how often you use our website (e.g. by tracking the number of unique page views received by the pages of the website) or via cookies. Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set your Internet browser to refuse cookies or to alert you when cookies are being sent. In some instances, you may have created a unique client ID and password in order to use certain portions of this website. You are requested not to divulge your client ID or password to anyone other than CLASS personnel and then only for the purpose of permitting them to provide service to you.
- Non-Personal Information: In addition to Personal Information you provide and cookies, CLASS may collect other information about your visits to our website. For example, we may collect information about your computer, such as your IP address (a number assigned to your computer whenever you access the World Wide Web); the type of Internet browser you are using; the type of computer operating system you are using; or the domain name of the website from which you linked to our website. This information will not be linked to your Personal Information and will only be collected in the aggregate in

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connection with all the users of our website for planning, forecasting and/or evaluation purposes.

3.0 Implementation:

CLASS will provide appropriate training to all employees or representatives of CLASS with respect to the requirements of this Policy.

4.0 Protection of Personal Privacy:

All personal information provided to CLASS from any source will be maintained in accordance with the privacy policies, regulations, and procedures of its member boards and in compliance with all governing laws and legislation including the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA") the *Personal Health Information Protection Act, 2004* ("PHIPA") and the *Personal Information Protection and Electronic Documents Act* (PIPEDA), as appropriate. Information will be collected and maintained on a strictly confidential basis. To the extent that any such information is provided to service providers including transportation, child care, as well as energy and environmental service providers, CLASS will ensure that appropriate clauses are included in the contracts with such service providers, which will require such providers to maintain and use such personal information on a strictly confidential basis and in compliance with privacy legislation.

- Service Providers: All personal information collected either electronically or by hard copy about a given service provider and its owners, directors, officers, and employees, will remain the confidential information of such provider, and will not be divulged to any person or persons or other organizations without obtaining the prior written consent from the service provider.
- Individual Personal Information: Whenever CLASS obtains Personal Information, whether electronically or by hard copy, we use reasonable efforts to protect it from unauthorized access, use or disclosure.

CLASS has no and does not maintain any control over the content of third party websites that may be identified on the www.cklass.com website or, if applicable, accessed through hyperlinks, including, but not limited to, the websites of local municipalities school boards or any other Community Use of Schools members/partners.

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- Website Content: The content that you post or transmit on or through our website, such as discussion postings between an individual, group or organization, and CLASS, should not be accessed by other users, including people you do not know to be trustworthy. Login credentials and related information with respect to discussion postings should only be made available to trusted individuals, employees or representatives who are responsible for communicating with CLASS. CLASS endeavours to reasonably protect the personal information you provide directly to it through these postings, such as yourself, your group or your organization's name, addresses, phone numbers, email addresses, etc.

5.0 Maintenance of Personal Information:

All Personal Information collected by CLASS will be stored in accordance with all governing laws and legislation including MFIPPA, PHIPA and PIPEDA. The security of your Personal Information is important to CLASS. When you enter sensitive information such as credit card numbers electronically, that information is encrypted using secure socket layer technology (SSL). No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while CLASS strives to use commercially acceptable means to protect your Personal Information, absolute security cannot be guaranteed.

6.0 Online Transactions:

All online financial transactions are conducted through DMS Technologies Inc., an independent third party provider of secure financial services. CLASS does not track or maintain any control with respect to personal financial data collected and financial transactions conducted online through DMS Technologies Inc.

<https://class.ebasefm.com/rentals/welcome>

7.0 Video Surveillance:

In accordance with CLASS operating procedure *STS-PRO-021-2014 Video Surveillance on School Buses*, the use of video surveillance equipment is authorized by CLASS and its member boards to enhance the safety of all students and employees.

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Acceptance and use of transportation services implies consent of parents/guardians for the recording of data and use of the system. Authorized personnel (CLASS, Transportation Service Providers & School Administration) are expected to review and comply with procedures and relevant statutes while performing any duties and functions that are related to the operation of the video security surveillance program. Records dealt with or created while delivering a video security surveillance program are under CLASS' control and are subject to relevant privacy acts.

8.0 Social Media:

CLASS may use social media platforms as a method of enhanced communication with our stakeholders and to share information to the wider public. In situations where users are connecting with a CLASS social media account, they are agreeing to the terms of use and privacy policy of that service.

Users must be aware of data protection requirements and ensure confidential and personal information remains protected. Additionally, users are to ensure that all communication on social media is compliant with relevant privacy legislation.