

Policy:	Privacy
Reference:	CC-PO-001-2016
Adopted:	June 22, 2016
Revised:	May 27, 2026 June 9, 2021



Policy:

Chatham-Kent Lambton Administrative School Services’ (CLASS’) collection, use, retention and disclosure of information (including Personal Information) in the course of its undertakings shall be in compliance with the applicable requirements of the *Education Act* (Ontario), the *Municipal Freedom of Information and Protection of Privacy Act* (Ontario) and other applicable legislation (together, “**Applicable Privacy Laws**”). CLASS shall endeavor to:

- provide the public with access to information under its control; and
- protect the privacy of individuals with respect to their Personal Information,

in accordance with Applicable Privacy Laws.

Background:

CLASS is incorporated under the *Not-for-Profit Corporations Act* (Ontario). Its two (2) voting members (the “**Members**”) are Lambton Kent District School Board and St Clair Catholic District School Board. CLASS’s operations include overseeing student transportation, community use of schools, child care services on behalf of its Members.

Policy Guidelines:

1.0 Access to Information:

CLASS will provide access to information under its control in accordance with Applicable Privacy Laws.

2.0 Collection and Sharing of Personal Information:

CLASS may, from time-to-time, collect Personal Information in the course of its undertakings, including individual’s names, addresses, phone numbers and email addresses. CLASS collects and stores Personal Information electronically, but may collect and store physical copies of information in some instances. CLASS may also

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collect other information in the course of its undertakings. By way of example, CLASS may track how often an individual uses CLASS' website, whether by tracking the number of unique page views or via cookies. Most Internet browsers are initially set to accept cookies. If an individual does not wish to accept cookies, they can set their Internet browser to refuse cookies or to alert the user when cookies are being sent.

CLASS does not share, rent or trade Personal Information collected by it with third parties, except for aggregated data in circumstances when the identity of individuals cannot be determined or as otherwise described herein.

3.0 Training:

CLASS provides training to its employees and representatives with respect to the requirements of this Policy.

4.0 Protection of Personal Information:

All Personal Information collected by or provided to CLASS from any source will be maintained in accordance with this Policy and Applicable Privacy Laws. To the extent that Personal Information is shared with CLASS' service providers (including transportation companies and child care services providers) CLASS will include provisions in the contracts with those service providers requiring them to maintain and use such Personal Information on a confidential basis and in compliance with Applicable Privacy Laws.

- Individual Personal Information: Whenever CLASS obtains Personal Information, whether electronically or by hard copy, it uses reasonable efforts to protect it from unauthorized access, use or disclosure.
- Service Providers: Personal Information collected either electronically or by hard copy about a given service provider and its owners, directors, officers, and employees, will not be shared by CLASS with third parties without the prior written consent from the applicable service provider.

CLASS has no and does not maintain control over the content of third party websites that may be identified on the CLASS website or, if applicable, accessed through hyperlinks included on CLASS' website, including, but not limited to, the websites of local municipalities, school boards or other community use of schools partners.

A user of CLASS' internet based services may create a unique client ID and password in order to use certain portions thereof. Users should not divulge their client ID or password to anyone.

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5.0 Online Transactions:

Online financial transactions through CLASS' website are undertaken utilizing either: the services of a third party, secure credit card payment processor; or, by way of electronic funds transfer. With regard to payments made through the services of a third party, secure credit card payment processor, the only information CLASS receives in respect of same is the name of the person who made a payment, the name of the credit card issuer, the amount of the payment and the first two (2) and last four (4) digits of their credit card. With respect to electronic funds transfers, the only information collected by CLASS is the payment information typically provided by financial institutions to their customers in respect of the receipt of such electronic funds transfers. CLASS does not share any of the aforementioned information, other than for purposes of confirming payment in relation to the applicable services or underlying matter.

6.0 Video Surveillance:

In accordance with CLASS operating procedure *STS-PRO-021-2014 Video Surveillance on School Buses*, CLASS and its transportation services uses video surveillance equipment to enhance the safety of all students and employees.

Acceptance and use of transportation services implies consent of parents/guardians for the recording of data and use of such equipment. Authorized personnel (CLASS, its transportation service providers and related school administration) are expected to review and comply with procedures and Applicable Laws while performing any duties and functions that are related to the operation of such video security surveillance equipment.

7.0 Social Media:

CLASS may use social media platforms to enhance its communications with its stakeholders and to share information to the wider public. In connecting to or using a CLASS social media account, the user will be agreeing to the terms of use and privacy policy of those accounts.