

	School Policy:	Privacy: External
	Category:	Privacy
	Last Modified:	December 13, 2022
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	Approved By:	Head of School
	Contact Person:	Privacy Officer

BACKGROUND

At Strathcona-Tweedsmuir School (STS) we are committed to maintaining the accuracy, confidentiality, and security of the personal information gathered from all individuals. This Policy describes the personal information that we collect from or about you, how we use it, and to whom we disclose the information to.

This Policy applies to and governs the activities of the Strathcona-Tweedsmuir School. This Policy covers only those activities that are subject to the provisions of Canada's federal and Provincial privacy laws, as applicable. All references in this Policy to "STS", "School", "we", "us", "our" and like terms should be interpreted accordingly.

STS has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals. This Policy applies to the personal information of all individuals, unless the personal information is related to an individual who seeks to be, is, or was employed by, or volunteered with STS. Such information is dealt within STS's [Privacy: Employee Policy](#).

If you are unsure of which Privacy Policy applies to you, please contact our [Privacy Officer](#) for more information.

What is Personal Information?

For the purposes of this Policy, personal information is any information about an identifiable individual. It is information that on its own or combined with other pieces of data, can identify an individual. Generally, personal information can mean information about your:

- Race, national, or ethnic origin
- Religion
- Age, marital status
- Medical, education, or employment history
- Financial information,
- DNA
- Identifying numbers such as your social insurance number or driver's license

What Personal Information do we Collect?

STS will collect and maintain different types of personal information in respect of the individuals with whom we interact. This may include, but is not limited to: name, address, phone number (home, cell, business), email, date of birth, SIN, employment information, family emergency contact information, and medical conditions. Additionally, our marketing software may capture information pertaining to your social media usage, Private Information Disclosure (PID), to help STS with growing enrollment.

From time to time, we may utilize the services of third parties and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

In most circumstances where the personal information that we collect is held by a third party, we will obtain your permission before we seek out this information from such sources. Such permission may be given directly by you, or implied from your actions.

Why Do We Collect Personal Information?

STS collects personal information to enable us to manage, maintain, and develop our business and operations, including:

- to establish, maintain and manage our relationship with you;
- to be able to review our operations so that we may understand your requirements and expectations of STS and so that we may work to meet or exceed those requirements and expectations;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number)
- to protect us against error, fraud, theft, and damage to our goods and property;
- to enable us to undertake our health and safety activities, including incident planning, response, and investigation;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

How Do We Use and Disclose Your Personal Information?

We may use or disclose your personal information:

- for the purposes described in this Policy; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When do we Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants, and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of STS through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- as part of STS's regular reporting activities;
- to protect the rights and property of STS;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent.

Your Consent is Important to Us

It is important to us that we collect, use, or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically, or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. There may be isolated times when the release of personal information when a reasonable person could infer consent by your action or inaction; however, typically, and as a matter of course, STS will seek your consent.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information.

As we have described above, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

Choice/Opt-Out

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

STS may contact you via Commercial Electronic Message (CEM) refers to both email and SMS messages (Short Message Service) (also known as a text message). By consenting to STS's SMS or email service, you agree to receive recurring emails or SMS messages from STS through your email address or your wireless provider to the mobile number you have provided, even if your mobile number is registered on any Provincial or Federal Do Not Call list. Messages may include updates, alerts, and information about STS and its programs. Promotional messages may include promotions and/or special days or events at STS.

Information gathered via a CEM method will not, as a matter of course, be shared with any third-parties; however, information may be shared with a service provider who has been contracted to perform services on behalf of STS.

Indemnity

To the extent permitted by applicable law, the user will agree that STS will not be liable for failed, delayed, or misdirected delivery of any information sent through a SMS or email, any errors in such information and/or any action the user may or may not take in reliance on the information or service.

How is Your Personal Information Protected?

STS endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify, or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing; email, phone calls/messages, or SMS messages will not suffice.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact the office of our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Retention of Information

STS will only retain your personal information for as long as is necessary for the fulfillment of the purposes for which it was collected or as required by law. Personal information is securely stored until such time it is no longer required, after which it is destroyed, rendering it unable to identify any individual.

Cookies

Each time you visit STS web pages, such as www.strathconatweedsmuir.com, STS will gather the date, time, browser type, name of the visitor's internet service provider, the site that referred the visitor to us, any pages that are requested, the navigation history, and IP address of the visitor.

The foregoing information does not generally contain anything that can identify users personally; however, if it does, we will treat and safeguard the information in a professional manner. STS uses this information for our internal security audit log, trend analysis and system administration, and to gather broad demographic information about our user base for aggregate use. This information may be shared with third parties in order to provide services to us or to analyze, store or aggregate the information.

The STS web pages may employ the use of "cookies". A "cookie" is a small line of data that is sent to the visitor's Internet browser from a web server and stored on the visitor's computer's hard drive. Cookies can track how and when a site is used, and which site was visited immediately before. A cookie does not damage any system and identifies only the browser, not the visitor personally. STS uses cookies to identify which areas of the website that a visitor has visited, so the next time a visitor visits those pages may be readily accessible. If the visitor does not wish to receive a cookie, the visitor must set the options in your web browser accordingly. Although such changes to the visitor's web browser may provide the visitor with enhanced anonymity, it makes it very difficult to offer a customized service.

To the extent that the STS website contain links to other sites, the owners of those sites are responsible for the privacy practices or content of those other sites. STS does not endorse and will not be responsible for the privacy practices on third party websites.

Each time a visitor to the website provides personal information such as a name, address, email, telephone number, or other identifying information to STS through our web pages and forms, the visitor consents to the collection, use, and disclosure of this personal information in accordance with this Privacy Policy. STS and

its employees will treat and safeguard personal information collected through our web pages the same way as personal information that is collected through other means, such as enrollment contracts.

Use of Links

Throughout our web pages, STS may provide links to other servers which may contain information of interest to our visitors. STS takes no responsibility for, and exercise no control over, the organizations, views, or accuracy of the information contained on other servers.

Abandoned Cart Disclosure

For the purposes of this Policy, Abandoned or Shopping Cart (hereinafter referred to as “Cart”) means the page where a donation or payment has been initiated on the STS website. The following statement will be used if STS uses SMS or an email to direct individuals to a donation page and they initiate a payment but do not complete or submit the payment in the Cart:

“The Strathcona-Tweedsmuir School website uses cookies to help keep track of items you put into your Cart including when you have abandoned your cart and this information is used to determine when to send cart reminder messages via SMS or via email.”

As a rule, any items in a Cart for 15 days will trigger a reminder via SMS or email. Any items in a Cart for 30 days will trigger termination/removal.

Inquiries or Concerns?

If you have any questions about this Policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Policy. The contact information for our Privacy Officer is as follows:

Privacy Officer
Strathcona-Tweedsmuir School
RR 2 Okotoks, AB T1S 1A2
Phone: 403-938-8301 or e-mail: privacy@sts.ab.ca

Revisions to this Privacy Policy

STS from time to time, may make changes to this Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information.

Interpretation of this Privacy Policy

Any interpretation associated with this Policy will be made by our Privacy Officer. This Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it shall mean "including without limitation".

This Policy does not create or confer upon any individual any rights, or impose upon STS any obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and Provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Policy and Canada's federal and provincial privacy laws, as applicable, this Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.