

 St. Michael's College School	Technology, Privacy, and Intellectual Property
Policy: Privacy Policy	F11.07.20

A. PURPOSE

St. Michael's College School ("the School") is committed to protecting the privacy of its community members' personal information. This Privacy Policy provides detailed information about how the School collects, uses, and discloses the personal information of its community members. It should be read in conjunction with our other School policies.

B. PROCEDURES

1. Personal Information That We Collect

The School collects personal data and information about its prospective, current and past students and their families; current and former faculty, staff, volunteers, suppliers and contractors; donors, friends and supporters; Governors; community affiliates and partners; website visitors; and other individuals connected to or visiting the School.

The personal information that the School collects takes different forms – it may include factual information, images, or other recorded information which identifies or relates to an individual. Some of this information may be publicly available; some of it may be provided through individuals' interactions with the School. It may have been collected before or after this Policy was first published.

Examples of the personal information that the School may collect about its community members include:

- Names, addresses, telephone numbers, email addresses, and other contact details;
- Family information;
- Admissions application and open house information;
- Fundraising, communication, and advancement information;
- Academic information such as attendance, grades, progress reports etc., and information about special educational needs;
- Employment data;
- Images, audio, and video recordings;
- Financial information;
- Courses, meetings, or events attended;
- Website visitor information;
- Health information; and
- Police reference check information.

The School will limit the amount and type of personal information it collects to that which is necessary for the purposes of School operations.

2. How We Use And Store Personal Information

The School uses personal information as required in order to carry out its educational mission and provide related services to its students and other community members.

For example, the School may use personal information collected from its prospective, current, and past students and their families for the following purposes:

- To teach and evaluate students, monitor their progress, and provide them with individualized academic and other support as appropriate;
- To accommodate students with particular educational needs;
- To administer its admission and financial aid programs;
- To communicate with current, former, and prospective students and their families about School events and activities, volunteer opportunities, and fundraising efforts;
- To administer co-curricular and extra-curricular activities; and
- To supervise off-campus activities and trips.

The School may use personal information collected from its current and former faculty, staff, and volunteers to create and manage its employment and volunteer relationships, including, for example, to solicit and evaluate applications, to hire and retain individuals, to administer employment-related services such as payroll and benefits, and to monitor performance.

Only certain individuals within the School are authorized to view and use personal information. Those individuals are permitted to use the information only for the purposes for which the information was collected. The School has implemented policies on the appropriate handling and safeguarding of personal information. It trains its faculty and staff on these policies, and requires their adherence to these policies.

Some of the personal information collected by the School is stored by outside hosted databases or cloud storage providers. The School requires these outside entities to maintain its personal information securely and in accordance with the School's privacy policies and all applicable laws.

In some cases, personal information collected by the School may be stored outside Canada. In such cases, the personal information will be subject to the laws of other jurisdictions and may be available to foreign government authorities under lawful orders and laws applicable therein.

3. How We Share Personal Information

The School may disclose personal information to others outside of the School where permitted by law. For example, the School may disclose personal information to outside organizations that provide services to the School, such as e-learning platforms, educational trip providers, employment profiles, consultants, and communication services. In such cases, the School discloses only the personal information necessary for the provision of the service. The service provider uses

the personal information only at the School's direction and in accordance with the School's privacy policies and all applicable laws.

The School may also be required by law to disclose personal information in some cases. For example, in certain circumstances the School may be obligated by law to disclose personal information to the Ontario Ministry of Education. From time to time, it may be compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant, government investigation, or other legally valid request or enquiry.

Except as required or permitted by law, the School will not disclose personal information to others outside of the School without the consent of the individual.

The School does not rent, sell, or trade personal information.

4. Changes of Personal Information

The School makes efforts to ensure that all personal information held in relation to an individual is as up-to-date and accurate as possible. All community members should notify the School of any significant changes to important information, such as contact details. Current families will be asked to verify their demographic information on an annual basis.

5. Contact information

If you have questions regarding your personal information or its use, please contact our Privacy Officer by email at privacyofficer@smcsmail.com , by telephone at 416-653-3180 , or by mail to:

St. Michael's College School
1515 Bathurst St.
Toronto, ON M5P 3H4
Attn: Privacy Officer

The School may amend this Policy from time to time. The date on which the Policy was last amended is provided at the top of the Policy.