

## **CAIS Policy O-301 Privacy**

Purpose: To affirm CAIS' commitment to protecting the privacy of its all individuals about whom CAIS collects personal information

Application: all individuals about whom CAIS collects personal information

Capitalized terms in this Policy are defined in the CAIS Glossary found [here](#).

### Policy Statement:

CAIS is committed to protecting its users' privacy and maintaining the integrity of any identifiable information that CAIS collects about its users ("**Personal Information**") through the [www.CAIS.ca](http://www.CAIS.ca) website and any related CAIS websites (collectively, the "**Site**"). CAIS believes that it is important that its users understand what Personal Information we collect about you and the following Privacy Policy explains CAIS' privacy practices, describes the steps that CAIS takes to keep Personal Information confidential, to inform its users about how and why CAIS collects Personal Information and to provide its users with CAIS contact information should a user have questions or concerns about CAIS' online Personal Information protection practices. CAIS understands that its users want to understand how CAIS collects, uses and discloses Personal Information.

### *Links to Other Websites*

The CAIS Site may contain links to the websites of Member schools, affiliate associations, corporate supporters and other third parties that are independently owned and operated by such third parties. These other websites have their own privacy policies and are not governed by this Privacy Policy. CAIS is not responsible for the privacy practices, or the content of any website(s) owned and operated by any such third parties. Other websites may collect and treat information collected differently, so CAIS encourages its users to carefully read and review the privacy policy for each website visited via the Site or otherwise.

### *How CAIS protects Personal Information*

CAIS keeps Personal Information that its users provide to it in strict confidence, subject to legal exceptions. Personal Information is not sold, and its users will be informed about how CAIS obtains, uses, and gives out Personal Information about them. Its users also have access to the Personal Information that CAIS has about them and CAIS respects its users' privacy when CAIS markets its services. []

### *What type of Personal Information does CAIS collect?*

CAIS limits the collection of personal information (in both amount and type of information as well as without misleading or deceiving individuals) to that which is necessary for purposes identified and ensuring it is collected by fair and lawful means. To access certain CAIS services a user may be asked to provide certain contact information (such as name, e-mail address, address, postal code, telephone number, etc.). Should a user wish to attend our professional development courses, the user will also be asked to provide CAIS with credit card or other payment information. []

### *How does CAIS collect Personal Information?*

CAIS will collect only Personal Information that its users have voluntarily provided to it. CAIS will not collect any Personal Information about its users without informing its users ahead of time (either through this Privacy Policy or at the time CAIS is requesting Personal Information from its users), why and how Personal Information is being collected and how such Personal Information will be used or disclosed (if applicable).

The following are examples of how CAIS may collect Personal Information:

- a. OnLine Job Applications – Users of the Site may search online for available positions at CAIS and Member schools and submit job applications online with respect to such openings. Users who use such service will be asked to provide a cover letter, a resume and provide particulars as to their work experience, proficiencies and work preferences.
- b. Educational Events – Users of the Site may wish to sign up to certain educational events offered by CAIS, including its Leadership Institute and conferences. Before registering and participating in these events a user will be asked to provide CAIS with certain Personal Information, including a username, e-mail address, postal code, telephone number, payment information, etc.
- c. Clickstreaming – Clickstreaming is a technology that allows the Site operator to track the paths that surfers take as they access a website and look at the site’s pages, and as they use links to other sites. CAIS collects such information from visitors to the Site.
- d. Website traffic information – CAIS monitors and analyses traffic information on the Site in order to determine which features and services are popular and useful to visitors, so that CAIS can improve its services. CAIS web servers also seek (as many websites do) to place a “cookie” (a small data file) on a user’s computer’s hard drive which allows the server to identify the computer when it visits again, in order to improve site navigation. This cookie is not used to obtain the user’s name or any other Personal Information. However, if a user prefers not to accept cookies, the user can set its browser to reject them or to alert the user before one is placed.

*For what purposes does CAIS collect personal information.*

1. provide ongoing services;
2. answer users’ questions, queries or complaints;
3. review and evaluate job applications filed online through the Site;
4. provide users with information (e.g. through direct mail and/or e-newsletters);
5. protect users and CAIS from error and fraud; and
6. where required, co-operate with law enforcement authorities, to comply with a court order or to prevent a breach of any applicable law.

CAIS will infer users’ consent to the collection of Personal Information for these purposes through users’ use of the Site and CAIS’ systems. CAIS will obtain fresh consent prior to using or disclosing personal information for a purpose outside of the purpose(s) for which the personal information was originally collected. []

*How CAIS may disclose Personal Information*

CAIS does not sell to third parties any Personal Information that CAIS collects. CAIS will obtain users’ consent before CAIS obtains, uses or discloses to other persons, information about users unless otherwise required or allowed by laws. CAIS may share the Personal Information that users provide with other companies hired to provide services for CAIS insofar as such sharing of Personal Information is consistent with and in furtherance of the purpose(s) for which the Personal Information was collected, and such sharing would be in line with the reasonable expectations of the individuals about whom the personal

information pertains. These companies – CAIS’ third-party vendors – are contractually bound to use Personal Information shared with them only to perform the services they have been hired to provide. CAIS does not share, sell, or lease Personal Information about users to any other third-parties except as otherwise described in this Privacy Policy.

By choosing to provide CAIS with Personal Information as described in this Privacy Policy, users are further consenting to its use in accordance with the principles outlined [Schedule One of PIPEDA](#) and as may be further outlined at the time of collection.

*Users may withdraw their consent after consent has been given*

The protection of Personal Information is of critical importance to CAIS. If a user does not wish to consent to a particular data collection (e.g. for marketing or publicity purposes), the user can refuse consent at the time the information is collected. A user can withdraw its consent any time after the consent is given, provided there are no legal requirements to prevent this, by sending an e-mail to [privacy@CAIS.ca](mailto:privacy@CAIS.ca). Any requests to withdraw consent will not any affect Personal Information that has already been lawfully disclosed to a third party in accordance with this Privacy Policy and privacy law. Rather such requests should be directed to the third party/parties to whom the Personal Information has been lawfully disclosed prior to CAIS receiving the request to withdraw consent.

Please note, if a user does not consent to certain uses of information, or if a user withdraws its consent, CAIS may not be able to provide the user with a particular service. If so, CAIS will explain the situation to the user to help the user with its decision.

*CAIS asks for consent before sharing Personal Information with third parties*

CAIS may share Personal Information about a user within CAIS and with (i) named third parties, i.e. in connection with the National Tracking Project; or (ii) CAIS’ third party vendors (including credit card processors); however, CAIS will not release Personal Information to anyone outside CAIS and such named third parties and third-party vendors without the user’s consent.

There are some limited exceptions to the above rule. For example, CAIS may collect, use or disclose Personal Information without a user’s consent if CAIS: i) must disclose information for legal reasons as CAIS may be compelled to release information by a court of law, or other legal or regulatory authority, and if so, CAIS’ policy is to release Personal Information only to the extent that CAIS is required to do so; and ii) has to protect the interests of CAIS as in certain circumstances CAIS may have to collect, use or release Personal Information for its protection; for example, CAIS may do so to detect or prevent fraud.

*Verifying and amending Personal Information*

A user can access their Personal Information to verify, update and correct it, and to have any obsolete Personal Information removed. For the purpose of clarity, CAIS users will have to put requests in writing to the address listed on the last page of this Policy. There is no charge for verifying or correcting Personal Information. Depending on the circumstances, there may be a charge if a user wants a copy of records. CAIS will let users know in advance if there is a charge. Please note that we will need to take reasonable steps to validate your identity prior to disclosing any personal information.

It may not be appropriate for CAIS to release certain information to a user. Where information will not or cannot be disclosed, CAIS will provide the user with the legal basis for non-disclosure.

If CAIS has obtained Personal Information about a user from other third parties, upon the user's request, CAIS will let the user know the third party that CAIS received it from, subject to applicable law.

#### *Responding to requests*

CAIS will use commercially reasonable efforts to deal quickly with a user's request to access its Personal Information and will always respond to a user within 30 days of a request. If CAIS needs to extend the time, or CAIS has to refuse a request, CAIS will tell the user why, subject to any legal restrictions and CAIS will notify the user of the new deadline, the reasons for the extension, and the user's rights under the applicable legislation respecting the extension. If you need assistance with completing an access request, CAIS can help upon request, and but doing so may require us to ask you for further information in order to provide such assistance.

Whenever possible, CAIS will update any Personal Information obtained from any source. If a third party has given CAIS Personal Information which a user tells CAIS is incorrect, CAIS will give the user the name and address of that party so that the user can correct the Personal Information.

There may be files that include information that CAIS is permitted to refuse the disclosure of, including files containing the personal Information about a user other than the individual submitting the request or files which contain CAIS' confidential commercial information. CAIS will strive to black out or remove such information and provide the user requesting access with the requested information after the necessary modifications. However, CAIS will make available to a user any factual Personal Information about the user contained in such files.

#### *Security*

CAIS will maintain appropriate physical, procedural and technical security measures with respect to all personal information we process so as to minimize any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to CAIS' disposal or destruction of Personal Information. CAIS staff members receive data privacy training on an annual basis on this Policy and other related organizational policies and procedures so as to ensure that staff are aware of their respective responsibilities.

CAIS keeps the Personal Information that it processes strictly confidential, subject to legal exceptions. Only authorized personnel have access to this Personal Information, and such access is limited to the specific personal information that a particular staff member needs to access at a particular time.

If any employee of CAIS or its third-party vendors misuses Personal Information, CAIS will consider such action as a serious offence for which disciplinary action may be taken, up to and including terminating of employment. If any individual or organization misuses Personal Information provided for the purpose of providing services to or for CAIS, then CAIS will consider this a serious issue for which action may be taken, up to and including termination of any agreement between CAIS and that individual organization.

CAIS' computer security specialists endeavor to build security into all its computer systems. Our security measures are designed to protect Personal Information at all times, when it is stored in data files or handled by CAIS employees.

CAIS has taken steps to protect the confidentiality of users' on-line viewing. When a user visits the Site, the Site is able to recognize the user's Internet service provider but does not identify the user as an individual (e.g. no IP addresses are logged or recorded). CAIS has also taken steps to ensure that any service providers and suppliers with whom it shares any Personal Information are committed to maintaining the privacy of

Personal Information, as outlined in this Privacy Policy, and prohibited from making any independent or unauthorized use of Personal Information.

However, for greater clarity, CAIS cannot guarantee that any Personal Information that a user may choose to disclose via the Internet will not be intercepted by third parties. CAIS assumes no responsibility for Personal Information disclosed through the Internet, which is intercepted, diverted or otherwise accessed.

*Retention and disposal*

CAIS keeps Personal Information only so long as it is needed to fulfill the purpose(s) for which it was collected, or otherwise to comply with a legal requirement. CAIS has retention standards which meet these requirements. CAIS destroys Personal Information when it is no longer needed to fulfill the purpose(s) for which it was collected, or anonymizes the data to render it no longer personal information.

*Resolving concerns*

CAIS is committed to upholding the CAIS Privacy Policy. Since CAIS is accountable for the Personal Information under its control, it has designated its Privacy Officer as responsible for CAIS' overall compliance with privacy laws and with this Policy. Responsibility for managing our organizational privacy management program rests with CAIS' Privacy Officer, who may designate one or more persons to assist that effort. Other individuals with CAIS may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and processing of Personal Information. CAIS will use commercially reasonable efforts to dedicate such resources as are reasonably necessary to ensure these privacy principles are adhered to and shall review these resources periodically. If a user has any questions, concerns or complaints about CAIS' Privacy Policy, or about how CAIS is living up to it, please let CAIS know by sending the Privacy Officer an email at [privacy@CAIS.ca](mailto:privacy@CAIS.ca) or by sending the Privacy Officer a letter to the following address:

Canadian Accredited Independent Schools (CAIS)  
PO Box 56, Jordan, ON L0R 1S0  
Attention: Privacy Officer

All requests to obtain access to personal information, and requests to correct personal information should also be sent to the Privacy Officer at the address above.

Whatever the circumstances, resolving the problem for the user is CAIS' primary concern. Providing legal action has not been taken on the matter, the Privacy Officer will consider a user's concern and the user will receive a response within 30 business days. If the user is not satisfied with the decision of CAIS' Privacy Officer regarding the complaint, the user can ask how its complaint can be considered further.