CFIS Privacy Statement

PURPOSE

Calgary French & International School ("CFIS") is committed to protecting personal information and meeting the standards established by Alberta's *Personal Information Protection Act* ("PIPA") and Canada's Anti-Spam Legislation ("CASL").

CFIS collects, uses, discloses and maintains, as required for defined purposes, personal information about students and their parents or guardians, employees, alumni, tenants, vendors, donors, contractors, volunteers, and friends of the school, as well as other individuals connected to CFIS and its various programs. The types of personal information retained are listed below, though not all are maintained for each individual. The specific personal information stored depends on the individual's role and business and operational needs in accordance with legislative requirements and for the period of time required to fulfill the purpose for which it was collected.

The personal information collected, used, disclosed and maintained by CFIS includes but is not limited to:

- Name, date of birth, addresses, home telephone numbers, email addresses, marital status, custody status, and other contact/family details.
- Health card number, social insurance number and passport number, as well as any other similar individual identification numbers necessary to fulfill defined purposes.
- Admission references, examination reports, and other data required for the admissions process.
- Academic, disciplinary, and other education-related records, information about special educational needs, references, examination reports, grades, and evaluations, and any information needed to support the educational success of our students.
- Employment and education history information, including educational credentials and licensing details.
- Images, and audio and video recordings.
- Financial information used to process payments, including but not limited to bank account and credit card details, tax filing information, and donor financial information.
- Personal health information.
- Records of courses, meetings, and events attended.
- Personal opinions, as may be collected through school survey initiatives.
- Any other personal information that may be required for a defined purpose.

As a school, CFIS must retain and process special categories of personal information such as health and financial information and education records, in accordance with applicable regulations.

COLLECTING, HANDLING AND SHARING PERSONAL INFORMATION

Most of the personal information collected at CFIS comes directly from the individuals or families concerned. Occasionally, personal information is collected from third parties (e.g., previous schools,

references) or from publicly available sources. The collection, handling and sharing of personal information is managed by policies, administrative procedures and internal controls. Personal information may be collected physically, electronically or both, and is accessed only by those with a legitimate business need. It is safeguarded by user privilege settings as well as backup processes and procedures, and other physical and administrative safeguards. Personal information is only shared externally when necessary for the business purposes of the CFIS Society or school (e.g., public health authorities and university application centers), or as otherwise required by law. In all cases where necessary, consent will be obtained prior to the use or disclosure of any personal information. If a change in purpose impacts your personal information and requires us to notify you, we will do so in a manner that meets our legal obligations. CFIS does not otherwise share or sell personal information or to other individuals or organizations without expressed permission.

CFIS works with third-party vendors and ensures that these companies comply with our expectations regarding privacy practices, data storage and backup, data residency, and retention. Personal information shared with these third parties will be limited only to what these third parties require to achieve their purpose.

PROCESSING PERSONAL INFORMATION

Personal information is kept and processed at CFIS to support the academic and business operations of the school in accordance with legislative requirements and for the period of time required to fulfill the purpose for which it was collected.

We process personal information for:

- Selection and admission of students.
- Submission to the Provincial Approach to Student Information ("PASI") system to securely share students' information with those stakeholders who need it.
- Compliance with PIPA and CASL.
- Employee administration including recruitment, administration of payroll, pensions and sick leave, review and appraisal of employee performance, conduct of any grievance, capability or disciplinary procedures; the maintenance of appropriate human resources records for current and former staff; and providing references.
- Volunteer administration.
- Promotion of the school through CFIS's website, social media channels, prospectus, and other marketing publications and communications.
- Maintaining relationships with alumni and the school community by communicating with students, families and employees and organizing events.
- Administration of individual health needs and custody and parenting arrangements, where relevant.
- Planning and execution of the Travel Studies program.
- Fulfillment of legislative requirements relating to the CFIS Society and its Governors.
- Any other activity that may require the collection, use, disclosure or maintenance of personal information.

THIRD PARTY SYSTEMS AND TOOLS

CFIS leverages various systems and tools for educational management, including Finalsite and PowerSchool, and advancement purposes, including Blackbaud's Raiser's Edge system. The school's technology infrastructure is generally supported on the technical side by the Associate Director, Technology.

The configuration, management, and operation of advancement databases are largely the responsibility of the Advancement Department. The Director of Development is a specialist in these databases and leads on database issues, training, and user profile implementation.

HOW LONG IS PERSONAL INFORMATION AND ACADEMIC DATA KEPT?

Student academic data is kept as required by the PASI record keeping policies as outlined by the Student Record Regulation (AR 97/2019) Appendix of the Alberta *Education Act*. Student transcripts and supplementary PASI information, for those who graduated from CFIS, are kept for seven (7) years. This information is available by request through CFIS Student Records Office if the student graduated from CFIS and the Alberta Student Record (ASR) was not moved for other reasons (e.g., usually enrolling in another school).

Non-academic personal information of a student is deleted from software systems under certain circumstances, including but not limited to when a student no longer uses the system, when the school is no longer in a contract with the software vendor, and when a student is no longer enrolled at CFIS. This is done to ensure the protection of the student's personal information and to comply with data retention policies.

All personal information provided during the student application process will be retained to complete the admissions process and destroyed within two (2) years if an application is withdrawn, an offer is rejected, or an application is unsuccessful. An applicant's personal information may be retained beyond two (2) years if an offer is accepted but the individual is placed on a waitlist, or the admissions process is deferred at the request of the parent or guardian.

Personal information provided by individuals seeking employment with CFIS will be retained for two (2) years so that Human Resources may contact an applicant to discuss other suitable positions that may be of interest.

CFIS retains personal information about current and past employees in accordance with employment laws and standards. CFIS will destroy files containing current and past employee personal information when such information is no longer reasonably required for legal, administrative, audit or regulatory purposes.

All other personal information is kept for as long as required for the defined purpose it was collected or in accordance with legislation (Canada Revenue Agency, CFIS Society Act and PIPA).

YOUR RIGHTS

You have rights under various personal information and privacy protection legislation and standards to access and understand the personal information CFIS holds about you. These rights include the ability to request the deletion or correction of personal information, or to request CFIS to stop processing your personal information. CFIS may be bound by legal obligations or business limitations that may prevent these requests from being fulfilled. In some cases, you may ask for personal information to be deleted or amended, or for CFIS to stop processing your personal information, but this is subject to certain exemptions and limitations.

You have the right to withdraw consent, where given, at any time, or otherwise object to receiving generic or fundraising communications. Please be aware, however, that the school may have lawful reasons to process the personal information in question even without your consent. That reason will usually have been asserted under this Privacy Statement or may exist under some form of contract or agreement with the individual (e.g., an employment or parent contract, or because of a purchase of goods, services, or membership of the CFIS Society).

CFIS has appointed a Privacy Officer, as required under applicable legislation. If you would like to access or amend your personal information, or if you have any other questions or concerns about how CFIS handles personal information, please contact the school's Privacy Officer directly at privacy@cfis.com.

CHANGE OF DETAILS

CFIS strives to ensure that all personal information held and processed by the school is as up-to-date and accurate as possible. If you are a current parent or guardian of a CFIS student, please log into our secure My CFIS parent portal to check and amend your contact card in the profile area. Any changes will be automatically sent to the appropriate department. Individuals can also contact the school's Privacy Officer to obtain assistance with changing their personal information.

THIS PRIVACY STATEMENT

CFIS's Privacy Statement should be read in conjunction with CFIS Society policies and CFIS Administrative Procedures, Handbooks, Agreements, Student Forms, Employee Forms and contract terms and conditions which refer to personal information.

CFIS reserves the right to update this Privacy Statement as needed and in order to comply with operational and legal requirements. These updates may be made without providing prior notice. We recommend that you periodically access this Privacy Statement to review the latest version. This will ensure you are aware of any changes that have been made to how your personal information is handled and protected.