

	Policy Title: Privacy Policy		
	Originated: September 2007	Review Date: December 2017	Approval Date: January 22, 2018
	Approved by: Board of Directors	Last Revision: March 23, 2015	Application: All

Purpose

The purpose of the *Privacy Policy* is to ensure Dandy Lion Daycare Centre (“the Centre”) collects, uses and discloses personal information in an appropriate, responsible and ethical manner.

Appropriate Use

The Centre will only collect and use personal information solely for the purposes of conducting childcare services as federal, provincial and municipal governments mandate.

Definitions

Personal Information – for the purpose of this policy, personal information is in reference to information provided by a parent/guardian regarding their child (ren). Examples include home address, gender, date of birth, allergies and/or personal details about the child.

Policy Statements

The Centre assumes full accountability for the personal information within its possession and control and has appointed the Centre Supervisor as custodian of all privacy matters and legal compliance with privacy laws.

1. The Centre obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how the Centre uses personal information and the Centre will limit the use of any personal information collected only to what is needed for those stated purposes. The Centre will obtain individual consent if personal information is to be used for any other purpose and will not use that information without the consent of the individual.
2. Under no circumstances will the Centre sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of the Centre fulfilling its stated business duties and day-to-day operations. This may include representatives of the City of Toronto (specifically Children’s Services and Toronto Public Health) for inspection and license renewals obligations, but only with the understanding that these parties obey and abide by this policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.
3. The Centre will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.

4. Access to personal information will be authorized only for the employees, Board members and other agents of the Centre who require the information to perform their job duties, and to those otherwise authorized by law.
5. Electronic files are secured on a password-protected computer.
6. Personal information is not transferred to volunteers and students, by e-mail or any other format.
7. The Centre's website will include this policy and will disclose the Centre's personal information and privacy practices. Individuals inputting data into the website (e.g. online registration forms) will be notified of:
 - a) Information about the organization collecting the data
 - b) How the data will be used
 - c) With whom the data may or may not be disclosed
 - d) The options available to the individual regarding the collection, use, and disclosure of personal information
 - e) The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under the Centre's possession and control
 - f) This website may contain links to other sites, but the Centre is not responsible for the privacy practices of other organizations' sites
 - g) While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information
 - h) Site visitors are given the choice to opt out of having their personal information used at the point where the information is gathered.
8. In most instances, the Centre will grant individuals access to their personal information upon presentation of a written request. Should the Centre deny an individual's request for access to his/her personal information, the Centre will advise in writing of the reason for such a refusal. The Centre may refuse to grant access where the information is prohibitively costly to provide, contains references to other individuals, cannot be disclosed for legal, security, or commercial proprietary reasons, is subject to solicitor-client or litigation privilege, or for any other reason allowed by law.
9. The Centre may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
 - a) The Centre is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal, under the purview of the appropriate authorities
 - b) An emergency exists that threatens an individual's life, health, or personal security
 - c) The personal information is already publicly available
 - d) Disclosure is required to investigate a breach of contract