

PRIVACY POLICY

St. Clement's 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.

THE PERSONAL DATA 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, 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. 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.

HOW WE USE AND STORE PERSONAL DATA

The School uses Personal Information as required in order to carry out its educational mission and provided related services to its students and other community members. For example, the School may use Personal Information 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 special 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.

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.

HOW WE SHARE PERSONAL DATA

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, job application and HR platforms, 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.

CHANGES OF PERSONAL INFORMATION

The School makes efforts to ensure that all personal data held in relation to an individual is as up-to-date and accurate as possible. All community members should notify the School Office 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.

THIS POLICY

If you have questions regarding your personal data or its use, please contact our Privacy Officers by:

Email at: kelsey.edmunds@scs.on.ca or marci.morgans@scs.on.ca

Telephone at 416 483 4414 x2266; or

Mail to: Privacy Officers
21 St. Clements Avenue
Toronto, ON M4R 1G8.

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

August 2019