

# WEBBER ACADEMY FOUNDATION

## GENERAL PRIVACY POLICY

Webber Academy Foundation (“**Webber**”) is committed to maintaining the confidentiality, security and accuracy of the Personal Information entrusted to us by students, parents, donors and individuals who use the services of Webber (collectively, “**Individual**” or “**Individuals**”). Webber’s privacy policy (the “**Privacy Policy**”) describes the information that Webber collects and how it is handled.

This Privacy Policy is intended to meet or exceed Webber’s privacy obligations arising under any applicable privacy legislation.

### **What is Personal Information?**

For the purposes of this Privacy Policy:

“**Personal Information**” means information about an identifiable individual, but does not include Business Contact Information. Personal Information may include, but is not limited to, an individual’s name, address, gender, date of birth, language preference, personal email address, telephone number, credit card information, employment history, disciplinary notes and academic achievements.

“**Business Contact Information**” means any information that is used for the purpose of communicating or facilitating communication with an individual in relation to his or her business or profession such as the individual’s name, position name or title, work address, work telephone number, work fax number or work email address.

### **What type of Personal Information does Webber Collect, Use or Disclose?**

Except where otherwise required or permitted by law, Webber will inform Individuals of the purpose(s) for which Personal Information is collected, used or disclosed in advance.

The type of information collected may include name, address, email address, personal phone number, gender, gender identity, gender expression, sexual orientation, ancestry, race, place of origin, religious beliefs, occupation, employment history, employment status, credit card information, bank account information, health information and notes from meetings and discussions.

Generally, Webber collects Personal Information directly from Individuals, or the parents of students under the age of 18. If third parties hold Personal Information Webber requires, it will endeavor to ensure appropriate consent is obtained as applicable.

### **How will Webber Use or Disclose Personal Information?**

Webber may collect Personal Information to use or disclose for purposes related to managing Webber’s business, including but not limited to:

- admissions;
- mailing newsletters;
- connecting family members in the event of an emergency;
- fundraising;

- accounting;
- advertising and promoting staff members and students;
- administering and maintaining Maplewood software;
- complying with applicable law or regulatory requirements;
- for additional purposes that may be identified at or before the time that the information is collected; and
- any other reasonable purpose to which the Individual consents.

Webber will not disclose Personal Information for purposes other than those identified at or before the time of collection, except with the Individual's consent or as required or permitted by law.

Webber may disclose or transfer certain Personal Information to third party service providers and to affiliated entities for the performance of certain technological or administrative functions, such as printing, data management and data storage. Prior to making any disclosure, Webber will take appropriate steps to ensure that such recipients safeguard the Personal Information, use the information only for authorized purposes and comply with any applicable laws.

### **Consent**

Requirements for consent to the collection, use, or disclosure of Personal Information vary. In determining whether consent is required and, if so, which form of consent is appropriate, Webber will consider both the sensitivity of the Personal Information at issue and the purpose(s) for which it will use or disclose the information. Consent may be express, implied or deemed.

By submitting Personal Information to Webber or its service providers and agents, Individuals agree that Webber may collect, use or disclose such Personal Information in accordance with the Privacy Policy or any applicable law. Further, Webber may collect, use or disclose an Individual's Personal Information without his or her knowledge or consent where it is permitted or required to do so by any applicable law or other regulatory requirements.

Subject to legal and contractual requirements, the Individual may refuse, withdraw or vary his or her consent to the collection, use or disclosure of Personal Information by Webber at any time by contacting the Privacy Officer. If the Individual refuses, withdraws or varies his or her consent, Webber will inform the Individual of the likely consequences, unless reasonably obvious.

### **Safeguarding Personal Information**

Webber will endeavor to safeguard Personal Information using methods that are appropriate to the sensitivity of the information. Specifically, Webber takes the following steps to safeguard any Personal Information that it collects:

- using appropriate security measures when destroying Personal Information, including shredding paper records and permanently deleting electronic records;
- managing electronic files appropriately with passwords and security measures that limit access by unauthorized personnel and reviewing security practices periodically to ensure that the privacy of Personal Information is not compromised; and

- retaining Personal Information only as long as is reasonable for legal or business purposes.

### **Accuracy of Personal Information**

Personal Information is kept as accurate, complete and current as appropriate. Individuals are responsible for providing Webber with any changes in Personal Information so that records may be accurately maintained.

Individuals may request, in writing, that Webber correct an error or omission in Personal Information within its control. Correction requests must be made to the Privacy Officer. The request must also provide sufficient detail so that the Privacy Officer can properly and efficiently respond to the request. If Webber is satisfied that a correction should be made, it will amend the information as requested and, where appropriate, will send the corrected information to the third parties to which it has disclosed that information.

Webber will respond to written requests within 45 days, unless an extension is granted.

### **Accessing Personal Information**

Individuals may request access to Personal Information and information regarding the collection, use and disclosure of that Personal Information. If an Individual wishes to review, verify or correct Personal Information, he or she may contact the Privacy Officer. All such communications must be in writing. The written request must also provide sufficient detail so that the Privacy Officer can properly and efficiently respond to the request. Webber may charge the Individual a fee to access his or her Personal Information and will advise of any such fee in advance.

Webber may not be able to provide access in situations where such refusal is permitted or required by any applicable law or regulatory requirements. Webber will inform the Individual of the reasons why, subject to any legal or regulatory restrictions, access has been denied.

### **Contacting Webber's Privacy Officer**

Questions and concerns about the Privacy Policy should be directed to the Privacy Officer:

Neil Webber  
President and Head of Webber Academy Foundation  
1515 93 Street SW  
Calgary, AB T3H 4A8  
Tel. 403-277-4700  
Fax. 403-277-2770  
Email [nwebber@webberacademy.ca](mailto:nwebber@webberacademy.ca)

### **Changes to the Privacy Policy**

Webber may from time to time make changes to the Privacy Policy without advance notice to reflect changes in its legal or regulatory obligations or in Webber's discretion.