

<b>Kemptville Campus OPERATIONAL POLICY</b>	
<b>Subject: Privacy policy</b>	<b>Policy No.: A13</b>
<b>Policy Objective(s):</b> <ul style="list-style-type: none"> <li>• To ensure the protection of personal information entrusted to the Campus.</li> <li>• To provide clarity on the conditions under which personal information would be disclosed to third parties.</li> <li>• To establish a mechanism for concerns to be raised and resolved.</li> </ul>	<b>Date Approved:</b> Jan. 30, 2024
	<b>Review/Revision Dates:</b>
<b>Applies to:</b> Campus staff, volunteers, Virtual chief information officer (independent third-party)	<b>Approved by:</b> Executive Director

## Policy Statement

Kemptville Campus Education and Community Centre is committed to protecting the privacy of personal information in relation to its operations and records management practices. We recognize the importance of maintaining the confidentiality and security of the information entrusted to us. This Privacy Policy outlines how we collect, use, disclose, and protect personal information in the context of our operations and records management. It is informed by the Canadian Standards Association Model Code for the Protection of Personal Information.

### 1. Collection of Personal Information (Identifying Purposes, Consent, Limiting Use)

Kemptville Campus collects personal information for the purpose of providing programs and services to our tenants, clients (including short-term renters), and the North Grenville community, as well as financial relationships with our suppliers. The types of personal information we may collect include, but are not limited to:

- Contact information (name, address, email address, phone number)
- Identification information (date of birth, government-issued identification)
- Employment information (position, organization)
- Financial information (banking details, payment information)
- Other relevant information necessary for any activities performed at Kemptville Campus

Additionally, in relation to our program delivery partners (such as school boards), the Ministry of Education and/or the Ministry of Labour, Immigration, Training and Skills Development (MLITSD) (and its agency, Employment Ontario), and/or other government funders may have access to personal information from students/trainees as required for administrative and reporting purposes. This information will be handled in accordance with applicable privacy laws and regulations.

We collect personal information directly from individuals, and it is used solely for the purpose of providing programs and services and maintaining records as per our tenant agreements, short-term licenses and, in the case of community-facing activities, convening, community-building, and marketing the services of Campus.

Kemptville Campus requires the knowledge and consent of individuals to collect and use (and disclose, as applicable) their personal information, and we limit the collection and use to that which is necessary to achieve the purposes outlined above.

## **2. Confidentiality: Safeguards and Security**

We maintain the confidentiality and security of personal information in our possession. Access to personal information is restricted to authorized staff who require it to perform their duties. We implement and maintain adequate security measures to protect personal information from unauthorized access, use, disclosure, alteration, or destruction, in consultation with the Campus's third-party virtual chief information officer (VCIO). We regularly review our security practices with the VCIO to ensure the ongoing integrity and confidentiality of personal information.

Supported by Campus policies and our VCIO, we have implemented appropriate physical, technical, and administrative safeguards to protect personal information from unauthorized access, use, disclosure, alteration, or destruction.

## **3. Disclosure of Personal Information**

We may disclose personal information in the following circumstances:

- With individuals' consent
- To third-party service providers and business partners who assist us in delivering our services (e.g., technical support services to tenants and short-term licensees who rent space on Campus)
- To funding bodies (governments, foundations, etc.) where required by their funding agreements (e.g., participation in or completion of apprenticeship training), in accordance with the Freedom of Information and Protection of Privacy Act (Ontario)
- In response to a court order, subpoena, or other legal process
- To protect our rights, property, or safety, or the rights, property, or safety of others
- In connection with a business transaction, such as a merger, acquisition, or assumption of Campus leases by the Municipality of North Grenville (the property owner).

We will take steps to ensure that any third parties who receive personal information from us have a privacy policy and procedures in place to protect the information.

## **4. Information Retention**

Personal information collected and maintained as part of our programs and services will be retained only for the duration specified by our clients and funders or as required by applicable laws and regulations. Once the retention period expires, we will securely dispose of the personal information (both paper copies and electronic records) in a manner that protects its confidentiality and prevents unauthorized access.

Personal information obtained for the purposes of delivering training programs funded by the Province of Ontario (including Employment Ontario) will be stored inside Canada residing in Canadian data centres with established ISO/IEC security standards meeting GO-ITS 25.0 General Security Requirements.

Personal information collected from program participants (and the forms they have signed) will be maintained for a period of seven years and made available to the relevant funder as required by the funding agreement, in accordance with applicable and regulatory requirements.

#### **5. Accuracy, Access and Corrections**

Kemptville Campus staff will take care to ensure personal information is accurate, complete, and as up-to-date as necessary for the purposes for which it is to be used. Individuals who wish to access or correct their personal information held by Kemptville Campus can submit a written request to the email or postal address provided below. We will respond to such requests within ten business days and in accordance with applicable laws and regulations.

#### **6. Website Usage Information**

When individuals visit our website, we may collect certain non-personal information such as IP address, browser type, and device information. This information is used to improve and enhance the content and functionality of our website. We do not disclose this information to third parties.

#### **7. Accountability and Openness**

Kemptville Campus has designated its Executive Director as the accountable officer for privacy matters. If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of personal information, please contact us at:

Kemptville Campus Education and Community Centre  
2 – 40 Campus Drive, Parish Hall – 3<sup>rd</sup> Floor  
Kemptville, Ontario, Canada K0G 1J0

Attention:  
Liz Sutherland, Executive Director  
[Lsutherland@kemptvillecampus.ca](mailto:Lsutherland@kemptvillecampus.ca)

Kemptville Campus will publish this Privacy Policy, as updated from time to time, at an easily accessible link on its website.

#### **8. Monitoring**

This policy will be reviewed every three years.