

# *Privacy Policy*



- information required during a child's attendance, such as attendance records, incident reports, documents related to the administration of medication, parental directives related to dietary restrictions, etc.
- information needed to compile a child's educational file, particularly the educational profile.
- information relating to staff members, practicum students or volunteers, including personnel files, training certificates, documents relating to verification of legal impediments, etc.
- any other personal information required for its activities.

## **1.2**

The people responsible for the protection of personal information and for the application of this policy are the Executive Director and Assistant Director. They can be contacted by telephone at 514-398-6943 or by e-mail at [director.cpe@mail.mcgill.ca](mailto:director.cpe@mail.mcgill.ca) or [assistantdirector.cpe@mail.mcgill.ca](mailto:assistantdirector.cpe@mail.mcgill.ca)

## **2.**

This policy describes the standards for collecting, using, communicating, and retaining personal information in order to ensure its protection and confidentiality. It explains the roles and responsibilities of the centre's staff members throughout the life cycle of this information. It also sets out a process for handling complaints about the protection of personal information.

### **2.1**

The consent of any person for whom the childcare centre holds personal information is the key element of this policy. Consent must be obtained at various stages in the life cycle of personal information. Consent may be implied in certain situations, for example, when an individual voluntarily provides their personal information as part of the centre's activities, such



The document entitled *Conservation Calendar Timeline* (Appendix 1) is to be used as a reference tool indicating the duration of time that documents are to be conserved by the CPE. This document is subject to change. It is the responsibility of the Privacy Officers to ensure its relevance and accuracy.

The security and protection of personal information is important to CPE McGill. Security measures are in place to ensure that personal information remains strictly confidential and is protected against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

These safety measures may include organizational measures such as restricting access to what is necessary for the performance of duties, backing up and archiving data, keeping written documents under lock and key, and technical measures such as the use of passwords that are subject to frequent change, two factor authentication in some cases and the use of firewalls.

In the event that the centre wishes to destroy the original documents following their digitization, it must respect the following conditions:

- the information contained in the digitized documents has not been altered and has been maintained in its entirety.
- the digitization, as well as the medium used to preserve the digitized documents, ensures the stability and longevity of the documents.

The centre chooses a medium or technology for storing its documents that enables it to meet these conditions.

CPE McGill ensures the quality of the personal information it holds. In this sense, personal information kept is up to date, accurate and complete to serve the purposes for which it was collected or used.

Personal information does not need to be constantly updated unless this is justified by the purposes for which the information is collected. However, if the information is to be used to make a decision, it must be up to date at the time of the decision.

## **2.5**

Original documents containing personal or confidential information are securely destroyed. The centre uses final document destruction techniques adapted to the level of confidentiality of the document to be destroyed, such as shredding in the office or by an external shredding company on site for bulk shredding when warranted.

## **2.6**

Any person may request access to their own personal information held by the centre or, subject to certain legal restrictions, request the correction of inaccurate, incomplete or equivocal personal information.

The person concerned must submit a written request to the privacy officer (Executive or Assistant Director), who must respond in writing within 30 working days of receipt of the request.

[Director.cpe@mail.mcgill.ca](mailto:Director.cpe@mail.mcgill.ca) or [assistantdirector.cpe@mail.mcgill.ca](mailto:assistantdirector.cpe@mail.mcgill.ca)

## **3.**

### **3.1**

All the terms of the life cycle of personal information apply whether the information is collected in physical documents or by technological means. When a technological means is used, the following terms are added.

Many interactions between the centre, parents and staff take place via technological means. They are recorded, as are the documents attached to them. Consent is deemed to have been given when a person participates in these interactions.

Given the nature of the Internet as a public network, the security of Internet transmissions cannot be guaranteed. The centre uses secure communication networks when transmitting personal information, however the centre cannot guarantee, and assumes no responsibility for, any breach of confidentiality, hacking, virus, loss, or alteration of data transmitted via the Internet.

Personal information provided to the centre is stored on secure servers with restricted access. The daycare ensures that the persons managing the servers takes reasonable technical measures to ensure a secure environment for the protection of personal information, such as firewalls, antivirus software, access management, intrusion detection and regular backups. Once reasonable or legal time limits have expired, personal information is removed from the daycare servers.

Servers that are used by CPE McGill include but are not limited to:

- Kaymbu for the developmental profiles of the children
- Caisse Desjardins for banking transactions
- Acceo for the children and family files

CPE McGill has reviewed and evaluated the privacy and security policies of the services we retain.

The CPE website is an informative, non-transactional site. As such, no personal information is collected, and no cookies are used.

The centre offers some links to third-party websites but is not responsible for the application of their own privacy policies or for any viruses or other destructive elements that may be present.

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uses and their apprehended consequences; and the likelihood



#### 4.

Any person concerned by the application of this policy may file a complaint concerning its application or, more generally, concerning the protection and confidentiality of their personal information held by CPE McGill by registering a written complaint to the Privacy Officer.

[Director.cpe@mail.mcgill.ca](mailto:Director.cpe@mail.mcgill.ca) or [assistantdirector.cpe@mail.mcgill.ca](mailto:assistantdirector.cpe@mail.mcgill.ca)

The individual must provide his or her name, contact information including a phone number as well as the subject and reasons for the complaint in sufficient detail to allow the complaint to be evaluated. If the complaint is not specific enough, the Privacy Officer may request additional information they deem necessary to assess the complaint.

CPE McGill undertakes to treat all complaints received confidentially.

Complaints are processed within a reasonable period of time. The Privacy Officer will evaluate the complaint and provide a written response to the complainant stating the findings. The purpose of the assessment is to determine whether the CPEs handling of personal information complies with the present policy and practices in place within the organization and with applicable legislation and regulations.

The centre must establish a separate file for each complaint addressed to it under the present complaint handling procedure. Each file contains the complaint, the analysis and the documentation supporting its evaluation as well as the written response to the complainant.

The Board of Directors of CPE McGill will be informed of any complaints received by either of the Privacy.