

3.3 Privacy Policy

Policy Context:

GHLS is committed to safeguarding the personal information entrusted to us by our clients. This policy outlines the principles and practices we follow in protecting personal information.

Policy Scope:

This policy applies to GHLS and to any person providing services on our behalf, including students, guardians, employees, Board Members, volunteers, donors (“stakeholders”). A copy of this policy is provided to any stakeholder upon request.

Policy Directives:

What personal information do we collect

Students and Guardians

Personal information means information about an identifiable individual. This includes an individual’s name, home address and phone number, age, sex, an identifying number, educational history.

We inform our students and student guardians, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we do not provide this notification is when a client volunteers information for an obvious purpose, such as contacting the school directly via email or other electronic form.

Employees and volunteers

Personal employee information is personal information about an employee or volunteer which is collected, used, or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. We only collect, use, and disclose the amount and type of personal employee information that is reasonable to meet the purposes outlined below. The following is a list of personal employee information that we may collect, use, and disclose to meet those purposes:

- Contact information such as your name, home address, telephone number, email.
- Criminal background checks.
- Vulnerable sector checks.
- Employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers.
- Other personal information required for the purposes of our employment or volunteer relationship.

How do we collect, use, and disclose personal information

Students and Guardians

We collect only the personal information from students and student guardians that we need for the purposes of providing services to our students, including personal information needed to:

- Deliver courses and events.
- Administer registration and enrolment in classes.
- Administer exams on behalf of the German Government.
- Establish and maintain communications with students/members.
- Send out school community information.
- Administer the school library.
- Respond to inquiries.

At times, staff may disclose the name and email to their class within their communication to establish an efficient working environment and communication.

Employees and volunteers

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references.
- Establishing training and development requirements.
- Assessing performance and managing performance issues, if they arise.
- Administering compensation.
- Complying with requirements of funding bodies (e.g. German Government/Embassy).
- Complying with applicable laws.

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain their consent, before or at the time the information is collected.

We collect personal information from stakeholders via forms, online forms, and emails. We store information electronically in Google Drive, Google Mail, Salesforce and Online Form software.

Consent

GHLS will ask for consent to collect, use or disclose an individual's personal information, except in specific circumstances where release of information without consent is required by law.

GHLS will not disclose information to Third Parties. A member may withdraw consent to the collection, use and disclosure of personal information at any time with the understanding that this action may hamper or prevent the provision of service by GHLS.

In some cases, after the employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering.
- General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship.

How we safeguard personal information

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. In some cases we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of GHLS, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide the remainder of the record.

A request for access to one's personal information may be made by writing to the Principal of GHLS. Sufficient information must be provided in the request to allow us to identify the information being sought.

Information may also be requested about our use of personal information and any disclosure of that information to persons outside our organization. In addition, a person may request a correction of an error or omission in their personal information.

Questions and complaints

Questions or concerns about any collection, use or disclosure of personal information by GHLS, or about a request for access to one's own personal information, should be directed to the Principal of the School at director@germanschool.ca.