Personal Information Privacy Policy for Employees and Volunteers

The School’s Commitment to You

Safeguarding the personal information of employees and volunteers is a fundamental concern of Flex Academy. The school is committed to meeting or exceeding the privacy standards established by British Columbia’s Personal Information Protection Act (PIPA) and any other applicable legislation.

This Personal Information Privacy Policy describes the policies and practices of Flex Academy regarding the collection, use and disclosure of personal information about employees and volunteers, including the steps the school has taken to ensure personal and financial information is handled appropriately and securely.

Flex Academy may add, modify or remove portions of this Personal Information Privacy Policy when it is considered appropriate to do so, and any such changes will be effective upon giving notice of the revised policy. This Personal Information Privacy Policy may be supplemented or modified from time to time.

Ten Privacy Principles

As part of Flex Academy’s commitment, the Ten Privacy Principles govern the actions of the school as they relate to the use of personal information. This Personal Information Privacy Policy describes the Ten Privacy Principles and provides further details regarding Flex Academy’s compliance with the principles.

Definition

In this Personal Information Privacy Policy, the following term has the meaning set out below.

> “personal information” means any information about an identifiable individual, as further defined under British Columbia’s Personal Information Protection Act or other applicable laws. Personal information excludes the name, position name

> or title, business telephone number, business address, business email, and business fax number of an individual, as well as any publicly available information as designated under applicable laws, such as information available from a public telephone directory or from a public registry.

Principle 1 - Accountability

Flex Academy is responsible for maintaining and protecting the personal information under its control. In fulfilling this mandate, the school designates (an) individual(s) who is(are) accountable for the school's compliance with the Ten Privacy Principles. This individual is the Privacy Officer of the school.

You may contact our Privacy Officer as follows:

Flex Academy	
Attention:	Privacy Officer
Address:	905 Badke Road, Kelowna, BC V1X5Z5
Phone:	1-877-862-2375
Fax:	250-762-9277
Email:	privacy@flex.academy

Principle 2 - Identifying Purposes

What Information is Collected, Used and Disclosed?

Employees

Flex Academy collects, uses and discloses personal information about employees in order to establish, manage and terminate the employment relationship and for other purposes identified when the information is collected. Set out below are some examples of personal information about employees collected, used and disclosed by Flex Academy:

- personal information collected, used and disclosed in the hiring process, including information on resumes and application forms (contact information, personal and professional history, qualifications, emergency contact information) results of criminal records checks, information collected from references;

- payroll and related information including, social insurance number, rate of pay, hours of work, deductions, bank account information, any court orders;
- benefit information including social insurance number, premiums or contributions, coverage information, date of birth, marital status, dependent information, medical information;
- performance information, including work history, performance reviews, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), internal competition information;
- other personal information as required or permitted by law.

Volunteers

Flex Academy collects, uses and discloses personal information about volunteers for the purposes of recruiting volunteers and establishing and managing an effective volunteer program and for other purposes identified when the information is collected. Set out below are some examples of personal information about volunteers collected, used and disclosed by Flex Academy:

- information collected, used and disclosed in the recruiting process including information on resumes and application forms (contact information, personal and professional history, qualifications) and information collected from any references;
- information related to the volunteer's services, including availability, schedule, duties, reviews, and related notes and memorandums and documentation related to volunteer qualifications (professional or technical qualifications);

Principle 3 - Consent

Requirements for consent to collection, use or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, what form of consent is appropriate, Flex Academy will take into account both the sensitivity of the personal information and the purposes for which Flex Academy will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed.

Most personal information is collected, used and disclosed for the purposes of establishing, managing and terminating the employment or volunteer relationship. In most cases, consent is not required. In other cases, consent will be sought or implied where it is reasonable to do so.

From time to time, Flex Academy may advise employees and volunteers of other purposes for which it will collect, use or disclose personal information, in which case the school will, if appropriate, obtain consent for collection, use or disclosure of that personal information.

Principle 4 - Limiting Collection

Flex Academy will limit the personal information collected to that information necessary for the purposes identified by the school.

Principle 5 - Use, Disclosure and Retention

Flex Academy will only use, disclose and retain personal information for the purpose for which it was collected unless the individual has otherwise consented or when its use, disclosure or retention is required or permitted by law.

How is Information Used?

Personal information about employees and volunteers is used for the purposes identified under Principle 2.

If for any reason personal information is required to fulfill another purpose, the school will notify the employee or volunteer of that purpose.

Flex Academy may use anonymous information, such as information collected through surveys or statistical information about employees and volunteers to improve the school's operations.

When May Information be Disclosed?

Flex Academy may disclose an individual's personal information to others in connection with the purpose for which it was collected, as consented to by the individual, or as required or permitted by law. Personal information about employees is disclosed to third parties for purposes related to the employment relationship, including to:

- government departments, bodies and agencies such as Canada Customs and Revenue Agency, Workers Compensation Board, Ministry of Education;
- payroll outsourcers; - financial institutions for payroll related purposes;
- insurance companies, benefit, group RRSP and pension plan administrators for enrollment in and administration of benefits, plans and claims;
- teacher certification information as per form I-2001 filed with the Ministry of Education;
- advisors to Flex Academy including accountants, lawyers and consultants;
- KCCS, the charitable society that oversees Flex Academy as reasonably required by the operations of Flex Academy and KCCS - when required or permitted by law.

Personal information about volunteers may be disclosed for the purposes of establishing and managing an effective volunteer program and for other purposes identified when the information is collected. Information may also be disclosed when required or permitted by law.

The school does not sell, lease or trade information about employees and volunteers to other parties.

Outside Service Suppliers

At Flex Academy, the school sometimes contacts outside organizations to perform specialized services such as printing, payroll services, market research or data processing. For example, the school gives its yearbook publisher the information required to produce the annual yearbook. Suppliers of specialized services are given only the information necessary to perform those services, and Flex Academy takes appropriate steps to ensure that such information is securely transferred and stored and is used only to fulfill the purposes for which it was disclosed to the

service provider.

Restricting Sharing Information

If an individual wishes to limit the sharing of personal information as permitted by law, the individual must submit to the Privacy Officer a written letter specifying which items of personal information are to be limited and to whom these items are to be restricted. The Privacy Officer will advise the individual whether the requested information can be restricted in the manner requested.

How Long Is Personal Information Retained?

Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected. Once the personal information is no longer required to be retained to fulfill the purposes for which it was collected and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

Principle 6 – Accuracy

Flex Academy will take appropriate steps to ensure that personal information collected by Flex Academy is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed. Employees and volunteers are responsible for providing up-to-date personal information to the school.

How May I Update Outdated or Incorrect Information?

An individual may, upon written request to Flex Academy, request that Flex Academy correct an error or omission in any personal information that is under Flex Academy's control and Flex Academy will, as appropriate, amend the information as requested and send the corrected personal information to each third party to which it has disclosed the information during the preceding year.

Principle 7- Safeguarding Personal Information

Flex Academy will protect personal information by security safeguards that are appropriate to the sensitivity level of the information.

Employees and volunteers will be appropriately educated about the importance of privacy and they are required to follow the school's policies and procedures regarding handling of personal information.

An employee's failure to abide by school policies may result in discipline, up to and including termination of employment. A volunteer's failure to do so may result in termination of the volunteer relationship.

Employee Files

Employee files are stored in secured filing cabinets. Access to personal information is restricted to authorized employees who have a legitimate reason for accessing it.

Electronic Security

The school manages electronic files appropriately with passwords and security measures that limit access by unauthorized personnel. The school's security practices are reviewed periodically to ensure that the privacy of personal information is not compromised.

Principle 8 - Openness

Flex Academy will make information available to individuals concerning the policies and practices that apply to the management of personal information. Individuals may direct any questions or enquiries with respect to the school's privacy policies or practices to the Privacy Officer of Flex Academy.

Principle 9 - Individual Access

Flex Academy will inform an individual, upon the individual's request, of the existence, use and disclosure of the individual's personal information, and shall give the individual access to it in accordance with the law.

How May I Access My Personal Information?

An employee or volunteer may access and verify any personal information with appropriate notice so that the office is able to supply the information required.

Principle 10 - Complaint Process

Individuals may question compliance with the above principles.

Questions, Concerns and Complaints

Questions, concerns and complaints about privacy, confidentiality and personal information handling policies and practices of the school should be directed to the school's Privacy Officer as referenced above.

> For more information please see the Conflict Resolution and Appeal Policy.

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