



# Vancouver Society of Children's Centres Privacy Policy

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## 1. Introduction

Your privacy is important to Vancouver Society of Children's Centres ("VSOCC"). This Privacy Policy explains how VSOCC collects, uses, discloses and retains personal information, including the personal information of minor children, parents and legal guardians of minor children and staff.

If you are a parent or legal guardian providing consent on behalf of a minor child, then in connection with VSOCC's collection, use, disclosure and retention of your minor child's personal information, references in this Privacy Policy to "you" mean your minor child and references to "your personal information" mean the personal information of your minor child. Please note that you may be asked to provide some of your personal information in addition to the personal information of your minor child.

If you do not consent to the collection, use, disclosure and retention of your personal information or, if you are a parent or legal guardian and you do not consent to the collection, use, disclosure and retention of personal information of your minor child, then you or your minor child may not be able to participate in VSOCC's programs and services or otherwise proceed with your intended interactions with VSOCC.

Please read this Privacy Policy carefully. In particular, please refer to the following key sections:

- [How VSOCC collects personal information](#)
- [How VSOCC uses personal information](#)
- [How VSOCC discloses personal information](#)
- [Your consent and right to withdraw your consent](#)

## 2. Application and Scope

**This Privacy Policy applies to the personal information that we collect when you interact with VSOCC, either through its Website, in person at our Locations or through any other interaction you may have with us.**

This Privacy Policy generally applies to any personal information (as defined below) VSOCC, or anyone acting as an agent on our behalf, collects about you through the VSOCC website (the "**Website**"), through a mobile app we may make available to you, in person at our facilities or any other location at which we provide our programs or services (each a "**Location**"), or through any other interactions you may have with us. At any time that you do business with VSOCC, participate in a program or service provided by VSOCC or with anyone acting as an agent on our behalf, or interact with us in any manner, you are protected by the rights and safeguards contained in this Privacy Policy and you explicitly agree to its terms.

## 3. Definition of Personal Information

**"Personal information" is broadly defined and includes any information about an identifiable individual, and may include technical information that is collected automatically. Information that is aggregated and/or anonymized is not considered to be personal information.**



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#### 4. How VSOCC Collects Personal Information

**We usually collect personal information directly from you, such as when you register for a program or service at a Location or on our Website. We may also collect personal information automatically, either when you visit us in person or online.**

**Information you provide directly to us.** In many cases, we collect personal information directly from you when you are interacting with us. For example, we may collect:

- contact information (such as name, email address, postal address and phone numbers) when you make an inquiry or contact us in person or through our Website or use a mobile app we may make available to you;
- contact information (such as name, email address, phone numbers and mailing address), gender, date of birth, medical information, emergency contact information and photograph when you register for a program or service (e.g. a child care service or a family resource program);
- contact information (such as name, email address, phone numbers and mailing address) and employment information when you apply for an employee or volunteer position with VSOCC;
- communications preferences and correspondence you send to us; and
- information collected about you offline (including via facsimile, mail or in person when you visit our Locations).

**Information Collected Automatically.** In some cases, we may collect information automatically (which may not necessarily identify you as an individual). For example, we may collect the following types of information:

- **Cookies.** VSOCC may automatically collect certain information regarding your use of the Website made available to you, such as the dates and times that you use the Website; the browsers, operating systems, software and devices that you use to access the Website; and other details of your use of the Website. For information about your choices with cookies, please refer to the [Your Consent and Right to Withdraw Consent](#) of this Privacy Policy.
- **Non-personal information.** Some of the information automatically collected automatically is non-personal information (because the information does not identify you), and VSOCC will deal with that non-personal information as explained below in this Privacy Policy unless applicable law requires otherwise.

**Information we obtain from other sources.** In some other cases, we may collect personal information from third parties, including:

- **Criminal record checks.** When you apply for an employee or volunteer position with VSOCC, we may complete a criminal record check in connection with your application, and VSOCC may also use the criminal record check information to update your confidential profile for use by VSOCC as set out in this Privacy Policy.
- **Support Services.** In some cases, we may receive personal information from support services and other third parties that provide related services to you (such as Supported Child Development and other social services organizations; nurses, therapists and other health professionals; and elementary schools and other educational organizations) to help us provide appropriate services to you.
- **Referrals.** When a third party organization refers you to VSOCC, we may receive some personal information from that third party organization in connection with the referral.



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## 5. How VSOCC Uses Personal Information

We may use your personal information to provide our programs and services, for our own internal purposes and for secondary purposes, although in this last case, subject to your [Right to Withdraw Consent](#) provided by this Privacy Policy. We may also anonymize and/or aggregate personal information so that it no longer identify an individual, and use it for any legal purpose.

VSOCC may use your personal information for various purposes in connection with our relationship with you and as otherwise set out in this Privacy Policy or permitted by applicable law, including:

- to provide our programs and services to you, to contact and correspond with you regarding your use of our programs and services and to help us meet your health and safety needs while participating in our programs and services;
- to develop a confidential profile for you, which will be used to provide information and services to you, to facilitate your deals with VSOCC and your use of our Website, a VSOCC mobile app, programs and services;
- to process and respond to your inquiries, requests and other communications;
- for internal training, quality assurance, risk management, fraud detecting and safety purposes;
- to understand and assess the interests, wants and changing needs of program participants with a view to providing personalized programs and services;
- to understand and assess the interests, wants and changing needs of program participants with a view to improving our programs and services and developing new ones (for example, we may assess the types of events our program participants prefer to determine which types of events to organize in the future);
- to meet legal and regulatory requirements;
- to meet reporting, auditing and funding requirements of the Federal, Provincial and Municipal Governments for funding programs.
- to protect and enforce VSOCC's legal rights, interests and remedies and to protect the business, operations and customers of VSOCC or other persons; and
- If you have applied for an employment or volunteer position with VSOCC, we will use your personal information to administer and process your application for employment or volunteering and other customary human resources purposes.

Subject to your [Right to Withdraw Consent](#) provided in this Privacy Policy, VSOCC also uses personal information for the following secondary purposes:

- to send you advertising and marketing messages about additional programs or services that may be of interest to you;
- to conduct surveys and ask for feedback on the quality of our programs and services;
- with respect to photographs and videos of you taken by or on behalf of VSOCC only, in VSOCC publications and materials (such as newsletters, brochures, reports, emails, website content or educational videos) or academic materials (such as reports, presentations and displays) prepared by VSOCC post-secondary practicum students for academic purposes; and
- if you have applied for an employment or volunteer position with VSOCC, we may send you information about new job opportunities within VSOCC as well as other career development resources.



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VSOCC may use your personal information to create non-personal information, and VSOCC may then use, disclose, transfer and retain the non-personal information as set out below in this Privacy Policy.

### 6. How VSOCC Discloses Personal Information

**VSOCC may disclose your personal information with our business partners or service providers. In some situations, we may also disclose your personal information to third parties as permitted or required by law (for example in response to a court order or investigation).**

VSOCC may disclose your personal information for purposes relating to or arising from your relationship and transactions with VSOCC and as otherwise set out in this Privacy Policy or permitted by applicable law, including:

- **Third party partners.** In certain circumstances, we may share personal information with third party organizations with whom we may partner from time to time, such as to provide a program or host an event. We may also share personal information with business partners with your consent or as authorized by law.
- **Support Services.** In some cases, we may provide personal information to support services and other third parties that provide related services to you (such as Supported Child Development and other social services organizations; nurses, therapists and other health professionals; and elementary schools and other educational organizations) with your consent or as authorized by law.
- **Referrals.** When we refer you to a third party organization, we may share some personal information with that third party organization with the referral with your consent or as authorized by law.
- **Funding Partners.** VSOCC may disclose your personal information to its funding partners (including the Federal, Provincial and Municipal Governments) in order to meet its obligations for application, reporting and audits for receipt of funding.
- **Service providers.** VSOCC may disclose your personal information to its suppliers and service providers (including to provide payment processing services, customer care, customer communications, data processing, data management, marketing, advertising and fraud detection) to assist VSOCC in the provision of information, programs and services to you, to provide services to VSOCC, to assist VSOCC to use your personal information as set out in this Privacy Policy and as otherwise permitted by applicable law. These service providers are not permitted to disclose this information to others. VSOCC will strive to protect personal information disclosed to third parties by contractual agreements.
- **As permitted or required by law.** VSOCC may disclose your personal information as required or authorized by applicable law, including to comply with a law, regulation, court order, subpoena, valid demand, search warrant, government investigation or other legally valid request or enquiry. We may also disclose information to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or to law enforcement, in an emergency or where required or permitted by law. We may release certain personal information when we have reasonable grounds to believe that the release is reasonably necessary to protect the rights, property and safety of others and ourselves, in accordance with or as authorized by law. VSOCC has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom VSOCC discloses the information in the foregoing circumstances, and the use, disclosure and retention of the disclosed information by those agencies, independent organizations or other persons is not subject to this Privacy Policy.



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- **Business transaction.** We may disclose personal information to a third party in connection with a proposed or actual business transaction in which VSOCC is involved (for example, a sale or transfer of business or assets, an amalgamation, a re-organization or a financing of parts of our business), but VSOCC will require the information recipient to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy and applicable law.
- **Specific consents:** VSOCC may disclose your personal information in accordance with express or implied consents that you give during your interactions and transactions with VSOCC.

Only those employees of VSOCC or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to personal information about program participants. VSOCC will not sell, rent or trade your personal information to any third party. Please refer to the section entitled [Your Consent and Right to Withdraw Consent](#) of this Privacy Policy to learn about your options with respect to the sharing of your personal information by VSOCC.

### 7. Your Consent and Right to Withdraw Consent

**When you interact with VSOCC, either through its Website, in person at our Locations or through any other interaction you may have with us, you agree to be bound by this Privacy Policy.**

**You have a right to withdraw your consent at any time. However, if you withdraw your consent to purposes that are integral to the provision of our programs and services, we may have to limit the programs or services we are able to provide. Other purposes, such as advertising purposes, are not integral to the provision of our programs and services and your opt-out of those purposes will not impact the provision of our programs and services to you.**

When you interact with VSOCC, either through its Website, a mobile app we may make available to you, in person at our Locations or through any other interaction you may have with us (for example, when you sign up for a child care service or a family resource program), you consent to the collection, use, disclosure and retention of personal information as set out in this Privacy Policy. Personal information may be collected, used, disclosed and retained without consent only as permitted by applicable laws. Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice.

**Withdrawing your consent for integral purposes.** If you withdraw your consent for purposes that are integral to the provision of our programs and services, we may have to limit the programs or services. If you ask VSOCC to delete your information, we will do so within a reasonable period of time. Please note that VSOCC may need to retain some information about you in order to satisfy our legal and security obligations. For example, some of your information may remain in back-up storage even if you ask VSOCC to delete it.

**Withdrawing your consent for secondary purposes.** Withdrawing your consent for secondary purposes will not impact the provision of our programs and services to you. You may withdraw your consent to your personal information being used or shared for the following secondary purposes:

- to communicate with you for the purposes of providing you with advertising and marketing messages pertaining to additional programs or services that may be of interest to you. You can always limit the electronic communications that VSOCC sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” at the bottom of any commercial electronic communication we send you. Please note that even if you opt out of promotional



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communications, we may still need to contact you with important information about your program or service;

- to conduct surveys or ask for your feedback on the quality of our programs and services.; and
- with respect to photographs and videos of you taken by or on behalf of VSOCC only, in VSOCC publications and materials (such as newsletters, brochures, reports, emails, website content or educational videos) or academic materials (such as reports, presentations and displays) prepared by VSOCC post-secondary practicum students for academic purposes.

To exercise these choices, you may advise us by contacting program participant service or contacting us using the information detailed in the [How to Contact Us](#) section below.

**Your Choice with Cookies.** You can block the use of cookies by activating the settings in your browser. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold consent, or subsequently block cookies, you may not be able to access all or part of the content of our Website. Additionally, you can disable or delete similar data used by browser add-ons, by changing the add-on's settings or visiting the website of its manufacturer.

### 8. Children

**We do not knowingly collect personal information from children under 13 without the consent of a legal guardian.**

We do not knowingly collect personal information from children under 13 without the consent of a legal guardian. To purchase our programs and services, we must obtain the consent of your parent or legal guardian if you are under the age of majority and consent is a requirement in the jurisdiction of your residence. If we learn we have collected or received personal information from a child where parental confirmation was required, we will delete that information. If you believe we might have any information from or about a child where we should have obtained parental consent, please contact us using the contact information detailed in the [How to Contact Us](#) section below.

### 9. Other Websites and Social Media

**This Privacy Policy only addresses the collection, use and disclosure of personal information by VSOCC. Other websites, including social media, have their own privacy policies and practices.**

VSOCC's Website, Locations and correspondence (including emails) may include advertisements for products and services offered by independent businesses or links to websites operated by independent businesses (including social media). VSOCC has no responsibility or liability for, or control over, those other websites, online services or businesses, their products or services, or their collection, use, disclosure and retention of your personal information. This Privacy Policy does not apply to the collection, use, disclosure and retention of your personal information by those websites, online services and independent businesses. In addition, if you access or post information to other websites (including social media), the personal information that you post or share in connection with those third party websites may be visible to other persons. We encourage you to familiarize yourself with the privacy statements provided by all third parties prior to providing them with information or taking advantage of an offer or promotion.



## 10. Location of Personal Information

**We may store your personal information in Canada, the United States and other countries. As a result, your personal information may be made be subject to the laws of other jurisdictions and made available to foreign government authorities.**

VSOCC and its service providers may process, store and use your personal information at facilities in Canada, the United States and other countries. The personal information protection laws of those other countries might be different from the laws of the jurisdiction in which you reside, and might permit courts, government, law enforcement agencies, regulatory agencies and security authorities to access your personal information without notice. By providing your personal information to VSOCC, you consent to the transfer of the personal information to facilities located in other countries and the processing and storage of the personal information at those facilities.

## 11. Security of Personal Information

**We strive to protect your personal information against unauthorized access.**

VSOCC uses reasonable safeguards – including administrative, physical and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in VSOCC's possession or under VSOCC's control to help protect the information from unauthorized access, collection, use, disclosure, deletion or similar risks. For example, we use industry-standard encryption technology to secure sensitive personal information when it is being collected and transmitted over the Internet as well as firewalls, site monitoring and intrusion detection software.

## 12. Retention

**We only retain your personal information for the time period necessary to fulfill the purpose for which it was collected, unless authorized or required by applicable law.**

VSOCC will retain your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with VSOCC's legal obligations or enforce or protect VSOCC's legal rights, or a longer period required or permitted by applicable law.

## 13. Accuracy and Access to Personal Information

**You have the right to access your personal information and to have it corrected by contacting us as detailed in the [How to Contact Us](#) section.**

VSOCC will rely on you to ensure that the personal information that you provide to VSOCC is accurate, complete and up to date as necessary for the purposes for which VSOCC uses the personal information. You will promptly notify VSOCC of any changes to the personal information that you provide to VSOCC using the procedures made available for that purpose by VSOCC or by contacting VSOCC's Privacy Officer using the contact information noted below.

VSOCC respects your right to access and correct your personal information. You may reasonably request access to your personal information collected by VSOCC and information about VSOCC's use, disclosure and retention of that personal information by submitting a written request to VSOCC's Privacy Officer using the contact information noted below. Subject to applicable exceptions and limitations prescribed by applicable law, you will be given reasonable access to your personal information and you will be entitled to verify the accuracy and completeness of your personal information and to have the information corrected as appropriate. You may be required to pay a reasonable fee for access to your personal information. VSOCC may decline to process a request that is unreasonably repetitive, frivolous, vexatious or impracticable, or if VSOCC reasonably believes that the requested access would infringe or jeopardize the privacy of other persons, or violate any applicable law or legal requirement, or for other reasons permitted by applicable law.



## 14. Non-Personal Information

VSOCC may use personal information to create and collect non-personal information (information that is not about an identifiable individual), including information that has been aggregated or otherwise depersonalized so that the information no longer relates to an identifiable individual. VSOCC may use, disclose, transfer and retain non-personal information for any purpose and in any manner whatsoever. If non-personal information is combined with personal information, then VSOCC will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined with your personal information.

## 15. English Language

You and VSOCC have each expressly requested and required that this Privacy Policy and all other related documents be drawn up in the English language. *Les parties conviennent et exigent expressément que cette Politique et tous les documents qui s'y rapportent soient rédigés en anglais.*

## 16. Notices to You

You consent to VSOCC sending you emails (to the email address you provide to VSOCC) regarding this Privacy Policy and related matters.

## 17. Change of Privacy Policy

VSOCC may change this Privacy Policy as it applies to VSOCC from time to time by posting a new version of this Privacy Policy on VSOCC's Website and, if the changes are significant, by providing you with a more prominent notice. VSOCC's collection, use, disclosure and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with VSOCC after any changes to this Privacy Policy will signify your consent to the collection, use, disclosure and retention of your personal information by VSOCC as set out in the changed Privacy Policy. Accordingly, you should check the "Last Updated" date of this Privacy Policy (at the top of this Privacy Policy) and review any changes since the last version.

## 18. How to Contact Us

If you have any comments or questions about this Privacy Policy or how VSOCC deals with your personal information, please contact VSOCC's Privacy Officer by mail or email at:

Privacy Officer  
c/o Vancouver Society of Children's Centres  
200-1362 Seymour Street  
Vancouver, B.C. V6B 3P3  
privacy@vsocc.org