Vancouver Society of Children's Centres
Privacy Policy

1. Introduction

Your privacy is important to Vancouver Society of Children's Centres ("**VSOCC**", "**we**", "**us**", or "**our**"). 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 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 our 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 ("**our Website**" or "**VSOCC's 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, this Privacy Policy applies.

In some cases, at the time of collection of your personal information, we may provide you with additional information regarding the processing of your personal information. We may also obtain your specific consent in certain circumstances to use or share your personal information, including where required by applicable law.

3. Your Consent

When you provide VSOCC with your personal information, you consent to the collection, use, disclosure and retention of that personal information by VSOCC in accordance with this Privacy Policy and as otherwise permitted by applicable law.

When you provide VSOCC with your personal information, either through our 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 family resource program or a child care service), you consent to VSOCC' collection, use, disclosure and retention of that 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 law.

Please refer to the Your Right to Withdraw Your Consent section of this Privacy Policy to learn about your options for withdrawing your consent.

4. Definition of Personal Information

"Personal information" is broadly defined and includes any information about an identifiable individual (a natural person), but does not include (to the extent permitted by applicable law) information that is publicly available in a telephone directory, business contact information that enables an individual to be contacted at a place of business, and other kinds of information that are not subject to regulation by applicable personal information protection or privacy laws. Information that is anonymized is not considered to be personal information.

5. How VSOCC Collects Personal Information

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

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

- contact information (such as name, email address, phone numbers and mailing address) 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 family resource program or a child care service);
- 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).

If you give VSOCC the personal information of another individual, then you are solely responsible for complying with all applicable laws, including obtaining the individual's valid consent, regarding your collection and disclosure of the personal information to VSOCC and to VSOCC's collection, use, disclosure and retention of the personal information.

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

- **Cookies and other technologies.** VSOCC may use technologies to automatically collect certain information regarding your use of our Website, such as the dates and times that you use our Website; the browsers, operating systems, software and devices that you use to access our Website; and other details of your use of our Website. For information about your choices, please refer to the Your Right to Withdraw Your Consent section of this Privacy Policy. VSOCC's Website, email messages, and advertisements may also use technologies (e.g. cookies, web beacons, tokens, pixels or tags) to automatically collect information that assists VSOCC to improve its programs, services, customer communications and advertising and to prevent fraud.

- **Non-personal information.** Some of the information collected automatically by technological means 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.

6. How VSOCC Uses Personal Information

We may use your personal information to provide our programs and services, for purposes that are integral to the provision of our programs and services and for additional purposes that are not integral to the provision of our programs and service, subject to Your Right to Withdraw Your Consent provided by this Privacy Policy. We may also anonymize personal information so that it no longer identifies an individual and use it in accordance with applicable law.

VSOCC may use your personal information for various integral 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 dealings with VSOCC and your use of our Website, a mobile app we may make available to you, and our 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 employee or volunteer position with VSOCC, to administer and process your application for employment or volunteering and other customary human resources purposes.

VSOCC also uses personal information for additional purposes, including:

- 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, 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 employee or volunteer position with VSOCC, to send you information about new job opportunities within VSOCC as well as other career development resources.

VSOCC may transfer your personal information to our 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.

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.

Information collected by technological means. VSOCC may use information collected by technological means to recognize you as a user of our Website, to facilitate and improve your use of our Website, and to confirm that email messages have been delivered to and opened by you and to provide you with targeted advertisements. VSOCC may use web beacons, pixels or gif tags and action tags to confirm that email messages have been delivered and opened. You may opt out of receiving emails or other commercial electronic messages in accordance with this Privacy Policy. Information provided by cookies may be collected and processed by VSOCC or by its third party service providers.

Interest-based advertising. VSOCC may use interest-based advertising services (sometimes called "remarketing" or "retargeting") provided by third party vendors to display advertisements on third party websites and social media sites visited by users of our Website. Advertising vendors use cookies, pixels or tokens – unique identifiers of a web browser on a specific computer that are installed on the computer when it accesses our Website – to display ads based on the computer's past access to our Website.

7. How VSOCC Discloses Personal Information

VSOCC may disclose your personal information to our business partners. In some situations, we may also disclose your personal information to other third parties as permitted or required by applicable 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 or required by applicable law, including:

- **Third party organizations.** 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 permitted by applicable 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 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 permitted by applicable 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 permitted by applicable law.
- **Funding partners.** VSOCC may disclose your personal information to our funding partners (including the Federal, Provincial and Municipal Governments) in order to meet our obligations for application, reporting and audits for receipt of funding.
- **As permitted or required by applicable law.** VSOCC may disclose your personal information as permitted or required by applicable law, including to comply with a law, regulation, court order, subpoena, valid demand, search warrant, government investigation or other legally valid requests or enquiries. 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 agencies, in an emergency or where permitted or required by applicable 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 permitted by applicable 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.
- **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. VSOCC has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the persons and organizations to whom VSOCC discloses your personal information as set out above.
- **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 or volunteers 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 Right to Withdraw Your Consent of this Privacy Policy to learn about your options with respect to the sharing of your personal information by VSOCC.

8. Your Right to Withdraw Your Consent

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. Additional purposes, such as advertising purposes, are not integral to the provision of our programs and services and your withdrawal of your consent for those purposes will not impact the provision of our programs and services to you.

You may withdraw your consent to VSOCC's collection, use, disclosure and retention of your personal information as set out in this Privacy Policy at any time, subject to legal or contractual restrictions and

reasonable notice. To exercise these choices, you may advise us by contacting us using the information detailed in the How to Contact Us section below.

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 we are able to provide. 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 additional purposes. Withdrawing your consent for additional purposes (e.g. to send you advertising and marketing messages) will not impact the provision of our programs and services to you.

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. You can also opt out of a remarketing vendor's use of cookies by visiting the Network Advertising Initiative's consumer opt-out page (https://optout.networkadvertising.org/?c=1).

Unsubscribing to electronic messages. You can always limit the electronic messages that VSOCC sends to you. Simply click the link labeled "unsubscribe" at the bottom of any email or use the applicable self-service unsubscribe procedure in any commercial electronic message we send you. Please note that even if you unsubscribe, we may still need to contact you with important information about your program or service.

9. Children

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

We do not knowingly collect personal information from children under 13 without the consent of a parent or 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 parent or legal guardian 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 parent or legal guardian consent, please contact us using the contact information detailed in the How to Contact Us section below.

10. Other Websites and Social Media

This Privacy Policy only addresses the collection, use, disclosure and retention 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 programs 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 programs 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

or 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.

11. Location of Personal Information

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

VSOCC uses reasonable safeguards, including contractual requirements with our service providers, to protect personal information wherever it is processed and stored. 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 jurisdictions 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.

12. 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. VSOCC implements a combination of measures to protect your personal information, including: contractual protections so that service providers with whom we share personal information maintain adequate privacy protections and standards, and the 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. Nevertheless, security risks cannot be eliminated and VSOCC cannot guarantee that your personal information will not be accessed, used, disclosed or deleted in ways not otherwise described in this Privacy Policy.

13. Retention

We only retain your personal information for the time period necessary to fulfill the purpose for which it was collected, unless permitted 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 if permitted or required by applicable law. Once no longer reasonably required to retain your personal information for the purposes set out or referenced in this Privacy Policy, we will securely destroy or anonymize your personal information.

14. 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 as 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.

15. 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 anonymized 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, as permitted by applicable law. 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 personal information.

16. Disclaimers, Liability Limitations/Exclusions and Disputes

The agreements (including any website terms of use, terms of service or other agreements) that you accept when you apply, register for, or use our Website, programs and services contain important provisions, including provisions disclaiming, limiting or excluding the liability of VSOCC and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or VSOCC's collection, use, disclosure and retention of your personal information, and are of the same force and effect as if they were reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those website terms of use, terms or service or other agreements.

17. 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*.

18. 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.

19. 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.

20. 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