



London Bridge Child Care Services Privacy Policy

London Bridge Child Care Services Inc. is committed to protecting the personal information of the children, and their families who are enrolled in our centres. Our privacy policy ensures our compliance with the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)* and to inform individuals of our continuing commitment to the protection of their personal information.

What is personal information?

Personal information is defined as any information, factual or subjective, that is about an identifiable individual. This includes information in any form such as a person's email address, food allergies, age, home address and so on.

Why do we collect personal information?

London Bridge believes in transparency, social responsibility and the safe and secure provision of quality childcare services for children and their families. We collect, use and disclose personal information for the following purposes:

- To identify clients of London Bridge Child Care Services (children and their parents/guardians)
- To communicate with our clients
- To ensure the health and safety of all children entrusted to our care
- To provide the responsible childcare services expected of a licensed childcare program to the children in our care and their families.
- To manage and enhance our business and operations
- To meet legal and regulatory requirements such as those contained in the *Child Care and Early Years Act* and its associated regulations
- To develop implement and monitor plans to meet the needs of children eligible for the services
- To administer our programs and services
- To collect payment for services provided
- To generate statistics on services for internal planning purposes
- To generate statistics for reporting to municipalities in which we operate in
- To report use of child care subsidies to the municipalities in which we operate in

When do we share or disclose personal information?

London Bridge may provide personal information to its consultants, subcontractors and professional advisers (which shall be bound by privacy obligations) to assist our uses disclosed herein.

We may use subcontractors located in the United States to process personal information. More information can be obtained from our Privacy Officer.

Except as described in this policy, London Bridge does not disclose personal information under its control to any other parties. It does not trade, sell, barter, or give away personal information to anyone.

We may disclose personal information to:

- Public Health
- Ministry of Education (including regulatory observers for them to assist in in managing, providing or evaluating our childcare services and program)
- City of London/County of Huron/Lambton County Children's Services
- London Bridge Board of Directors
- Therapists, volunteers, and students on placement with London Bridge Child Care Services
- Agencies providing payroll and banking services
- Our auditors
- A third party where the individual (or his/her parent/legal guardian) has consented to such disclosure
- A third party where such disclosure is required or permitted by law.

Consents

Having read this policy, by enrolling your child in our child care program and by providing us with the information requested, you consent to the collection, use and disclosure of your personal information as specified herein.

If London Bridge desires to use or disclose personal information for purposes that have not been stated in this policy, we will first obtain your express consent (either orally or in writing). With written notice, you may withdraw consent at any time subject to legal or contractual restrictions and reasonable notice. Please note however, that due to our statutory and regulatory obligations withdrawing consent may affect our ability to continue to provide a client with the services they have or would like to receive.

How long is your information retained?

We retain personal information only as long as it remains necessary or relevant for the identified purposes and in accordance with legal requirements. Therefore, we will retain your child's file as long as your child is enrolled in our childcare programs and for a fixed period of time thereafter.

London Bridge Child Care Services retains and securely destroys personal information in accordance with our internal record retention procedure. Our retention procedure takes into account retention requirements for financial and insurance records, the statutes of limitation relevant to injuries that occur while children are in our care, as well as the requirements of the *Child Care and Early Years Act* and its associated Regulations.

Accuracy of Your Personal Information

We make every effort to keep personal information accurate and up to date. We rely on you to keep us updated of any changes in a timely manner, so that the personal information we have is accurate at all times. This is particularly important with respect to the health and safety of your child. In the event of emergency, for example, having quick access to current telephone numbers and alternate emergency contact persons is essential.

We limit access to personal information only to those who require it to provide you with service. Personal information is stored in a combination of paper and electronic files. They are protected by security measures appropriate to the nature of the information.

Concerns

Should you have any questions or concerns related to the collection, use or disclosure of your personal information at London Bridge Child Care Services, please contact our Chief Privacy Officer in writing (marked confidential) at the following address, or send an email to privacy@londonbridge.com

London Bridge Child Care Services
550 Fanshawe Park Road E
London, ON
N5X 1L1
Attention Privacy Officer