



Privacy Notice

Strong Start® Charitable Organization is committed to protecting the privacy of the personal information of its employees, volunteers, members, children, parents/guardians, donors, partners and other stakeholders, by following responsible information handling practices in keeping with privacy laws. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

During the course of our various projects and activities, Strong Start frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of this information other than for the purposes for which Strong Start is engaged by a school or school board, is subject to consent. Strong Start's privacy practices are designed to achieve this.

Strong Start uses current information and communication technologies to support our Strong Start activities. Our Privacy Notice covers Strong Start Charitable Organization and our websites.

Defining personal information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions, as well as facts about, or related to, the individual. Business contact information, and certain publicly available information are not considered personal information.

Business contact information is excluded from the definition of personal information. Where home contact information is used as business contact information, Strong Start considers that the contact information to be business contact information.

We consider donor and volunteer information always to be personal information, and do not disclose information without consent.

What information do we collect, and why:

Our Roles, and Children's Information

Strong Start typically works with schools and school boards. In that context, we are providing a service to schools, and we operate under their authority to collect and process personal information, and we comply with their directions and policies relating to personal information.

It is important to note that unless Strong Start is directly providing services to children, we do not require the collection or processing of any identifiable information relating to



children.

Strong Start's websites and proprietary web applications are not intended for minors, and we do not knowingly collect or process any minor's data. In all cases, the purpose for the collection of personal information is to support, improve, and maintain Strong Start's programs.

Program-Specific Information Collection:

- *Letters, Sounds and Words™* Program: This program is delivered by Strong Start in partnership with school boards and schools. Strong Start's proprietary web application, SiTE SOURCE™, does not require any children's information other than grade, program category based on grade, and whether or not they are a Multilingual Language Learners; this information is linked to a randomly-generated identifier, and only the school can link this information to any particular child. The personal information collected through this program includes adult contact (name, email and optionally telephone) information, of school staff, and of volunteers trained to deliver the program.
- *Get Ready for School™* Program: This program is delivered by Strong Start in partnership with local community centres, and information is collected about children and families, and includes contact information of the parents or legal guardian, and the child's name, gender, date of birth, languages spoken and health concerns. On conclusion of the program, information collected through it is disposed of.
- *Baby Connections®* Program: This program is delivered by partners, such as libraries or agencies, and the Program Partner is responsible for collection of personal information. Parents may optionally provide their contact information and baby's month and year of birth to Strong Start, through a survey at the conclusion of the program.

Donors

We collect donor information, and in doing so, rely upon third-party platforms in order to facilitate maintaining mailing lists and facilitating payments made by donors to Strong Start. When utilizing such third-party platforms, you are subject to their respective privacy notices and practices. The information that is collected by these platforms is used by Strong Start to manage its donor program, and is limited to name, address, email, donation amount and history, relationship management, as well as designated gift program. Information that may be voluntarily provided may also include business, family and/or volunteer associations. Tax receipts are issued by the third party directly, unless



the donation is made directly by way of cash, cheque or e-transfer directly to Strong Start. Donations may always be made anonymously.

Agreements with Schools

Strong Start operates under agreements with schools and school boards, agencies and other organizations. These entities have the relationships with their employees and volunteers that will utilize Strong Start's programs and technology, so contact information that is provided is collected, used and maintained in order to support and under the authority of that agreement. No information relating to adult contacts is maintained other than name, email address, title or role if an employee, and cellular or other phone contact information.

Agreements with Volunteers

Strong Start operates its Volunteer Information Portal (ViP) to allow trained Volunteer Coaches to be matched with schools that require volunteers. These volunteers are the responsibility of the school running the *Letters, Sounds and Words* program. Information that is collected, on a voluntary basis, includes name, email, phone contact information, and optionally, address. In addition to this, information is collected relating to training history, activity or program, and preferences in relation to training locations and types. Only name, email, date of last volunteer activity, and if provided, phone number, are shared with the school(s) where the volunteer supports the program. This information is shared with the school through SiTE SOURCE.

This information is shared with schools and school boards, in order to match available volunteers with their needs. Additional information may be collected by schools and school boards, subject to their own legal requirements and privacy obligations.

Individuals who volunteer directly with Strong Start including but not limited to *Get Ready for School* classroom volunteers, Materials volunteers, Board Members, Trainers, Assessors and Subject Matter Experts, are the responsibility of Strong Start. Information that is collected includes name, address, phone number, and emergency contact information. Birthdate collection is required for all Board Members as per the Canada Revenue Agency.

Applicants

Potential employees of Strong Start may apply through third-party online platforms utilized by Strong Start for management of human resources and job applicants. Provision of your information is subject to the terms and conditions of these third-party applications and their



privacy notices. Strong Start only retains applicant information for twelve months after an application is made and is limited to that provided by an applicant through the platform and what may be contained in the information provided by the applicant in that process.

Strong Start observes the following practices when collecting, maintaining and using personal information:

Consent

Other than the situation where Strong Start is providing services to a school or school board, agency or other organization, an individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's consent is required before confidential information is released to outside parties. The type of consent is related to the nature of the information collected and its intended purpose.

We collect personal data as part of our operational practices, such as program and volunteer registration, training, and events, in order to better meet your program, service and information needs. We also use and disclose data which does not identify individuals, for evaluation purposes to develop and enhance Strong Start programs and services.

Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. Strong Start shall not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. Strong Start attributes all data that it collects.

Limited Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Additional consent will be requested in order to provide stories to media, research and other public relations work.

Personal information shall be retained only as long as necessary for the fulfillment of its purpose and thereafter shall be deleted or anonymized, in accordance with Strong Start's retention policies, or as required by schools or school boards pursuant to our agreements with



them. Anonymized and aggregated information is retained in order to support Strong Start's research and ongoing efforts to improve the quality and delivery of its programs.

Information is shared only with schools and school boards pursuant to Strong Start's agreement. Service providers who are under confidentiality obligations pursuant to contracts with Strong Start, may also be utilized to store and process personal information.

Accuracy

Personal information shall be as complete, accurate and up-to-date as possible. Personal information that is collected, used and disclosed by Strong Start is provided by individuals and is updated by Strong Start when requested by the individual. If an individual's personal information requires amendment, they may contact Strong Start using the contact information provided at the end of this Privacy Notice. Individuals are encouraged to review, correct and update personal information.

Security Safeguards & Confidentiality

Personal information gathered by Strong Start shall be kept in confidence. Strong Start personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

Strong Start maintains physical, electronic and administrative safeguards that are appropriate to the type of personal information we obtain from you. Strong Start staff and volunteers with access to personal data are required to respect the confidentiality of personal information and handle it responsibly.

Openness

Individuals accessing SiTE SOURCE™ are provided with a link to our Privacy Notice and are informed of any changes to it. Upon request, individuals shall be provided with the information on their personal participant, donor, staff and/or volunteer record. In the event of a privacy breach that causes a reasonable risk of significant harm, you will be notified by email as soon as



reasonably possible.

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.priv.gc.ca.

Ongoing Relevancy

Strong Start regularly reviews its policies and procedures to ensure we remain current with changing laws.

Cookies

Strong Start's websites use persistent cookies within visiting browsers to enable the functions of the website and for tracking performance. Specifically, cookies are used the following ways:

- Preserving and expiring visitor sessions on the site (e.g., preserving data between steps of a process; and ending the session after a period of inactivity)
- Storing font size preferences on the site
- Enabling web analytic tools (such as Google Analytics – see below)

Cookies are used anonymously and without storing personal information. Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies. Note that declining cookies may adversely impact site performance. Visitors may further wish to enable the Do-Not-Track (DNT) or the Global Privacy Control (GPC) features of their web browser.

Strong Start's websites may contain links to other websites owned and operated by third parties. While we attempt to ensure that these organizations adhere to similar privacy policies, we are not responsible for the content or privacy practices of such websites. It is highly recommended that you review the privacy policies of other sites prior to providing any personal information on those sites.

Google Analytics

Strong Start's website uses [Google Analytics](#) to track performance. Google Analytics uses [persistent cookies](#) to track visitor sessions, visitors across multiple sessions, and referral sources to our sites. We also track the performance of promotional links to our site using Google Analytics. In compliance with the [Google Analytics Terms of Service](#), at no time is personal information passed to Google Analytics. Note that Google Analytics stores its data within the United States of America and is subject to US laws. We use this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data



collection should use the [Google Analytics Opt-out Browser Add-on](#).

Learning more about Strong Start's Privacy Notice

The most up-to-date version of this Privacy Notice is available on Strong Start's website www.strongstart.ca. This notice is also available in hard copy at the Strong Start National Program Deployment Centre, a copy of which can be requested by contacting:

Strong Start® Charitable Organization
1-565 Kumpf Dr.
Waterloo, ON N2V 1K3

Phone: (519) 743-9578
Email: info@strongstart.ca

Concerns about personal information held by Strong Start

If individuals have a concern related to Strong Start's Privacy Notice, they can contact the Chief Executive Officer in writing using the above contact information. If the Chief Executive Officer is unable to resolve the concern, or if there are further questions, individuals may contact the Privacy Commissioner of Canada at www.privcom.gc.ca or at:

112 Kent Street
Ottawa, ON K1A 1H3

Phone: (613) 995-8210
Toll free: 1-800-282-1376
Fax: (613) 947-6850
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