

SUGAR N SPICE KIDDIE HAVEN INC.

OUR PRIVACY PROTECTION PLEDGE

We want to make sure that we comply with the new legal obligations imposed by the federal government's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") regarding the collection, use and disclosure of personal information in commercial activities.

That is why we have developed this Privacy Protection Pledge. We want you to understand the purposes for which we collect personal information. We also want to make sure that we have your consent to continue to collect, use and disclose this personal information for these purposes.

We have also developed a Privacy Policy, which specifies and describes the principles and guidelines that we have adopted for the collection, use, disclosure and retention of personal information.

The following is a brief summary of our privacy practices:

What is personal information?

Personal information is any information that can be used to identify, distinguish or contact a specific individual. Personal information can include facts about, or related to, an individual, as well as an individual's opinions or beliefs. Personal information does not include publicly available information (for example, names, addresses and telephone numbers which are published on an annual basis in telephone directories) or business contact information (the name, title, business address or telephone number of an employee of an organization).

Why do we collect personal information, and how do we use it?

In carrying on business as a licensed child care facility, we collect personal information about the children in our care, their parents/legal guardians, their siblings, and other individuals who are also involved in their care and upbringing (collectively, "***the children in our care and their families***"), about our independent contractors (ie. people who regularly work for us, but who are not paid as employees), directors, therapists, volunteers, work experience students and educational or regulatory observers, and about other people in the general community with whom we interact (collectively, "***our other constituents***"). We respect the privacy of all of these individuals, which is why we collect and use personal information only for the following purposes:

1. To identify the children in our care and their families, as well as our other constituents;
2. To establish and maintain responsible relationships with the children in our care and their families, as well as with our other constituents;
3. To understand, develop and/or enhance the needs, desires, concerns and opinions of the children in our care and their families, as well as our other constituents;
4. To provide the services expected of a licensed child care facility to the children in our care and their families, all with a view to advancing the goals of our Mission Statement;

5. To manage and develop our business and operations; and
6. To meet legal and regulatory requirements.

We collect information only by lawful and fair means, and not in an unreasonably intrusive way. We collect personal information from day to day observations of, or interactions with, the children in our care and/or from their parents/legal guardians, as well as from our other constituents.

When do we disclose personal information?

There are a variety of circumstances where we may need to disclose some personal information about the children in our care and/or their families, or about our other constituents. However, with the exception of those circumstances where disclosure is required or permitted by law, we make sure that any disclosure of personal information is made on a "need to know" and, where applicable, on a confidential basis, and in accordance with the provisions of The Community Child Day Care Standards Act (Manitoba) and the Child Day Care Regulations. We also use contractual or other means to protect the information and to make sure that the information is used only for the purpose(s) for which it was disclosed.

Subject to the foregoing, we may disclose an individual's personal information:

1. To our employees, independent contractors, directors, therapists, volunteers, work experience students and educational or regulatory observers; or
2. To a third party who requires personal information in order to:
 - (a) provide (or assist us in providing) for the physical, emotional, social and/or intellectual well being and/or safety of the children in our care; or
 - (b) assist us in our general administration and/or operations (which includes record keeping, debt collection and fund-raising activities); or
 - (c) assist us in providing products and/or services to the children in our care and their families, or to our other constituents; or
3. To a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by the disclosure of the information; or
4. To a third party who requires such information and who is part of our organizational group; or
5. To a third party with whom we are negotiating for the purpose of them taking over some or all of our services and/or other activities; or
6. To representatives of other licensed child care facilities if that individual has not promptly satisfied his/her debts to us; or
7. To a third party where that individual (if he/she is an adult, otherwise his/her parent/legal guardian) has consented to such disclosure; or
8. To a third party where such disclosure is required or permitted by law.

We will not disclose an individual's personal information in our possession or under our control to any third party for the purpose of enabling that third party to market its products and/or services to that individual (or to that individual's family) without first seeking the express consent of that individual (if he/she is an adult, otherwise his/her parent/legal guardian) to do so.

How do we protect personal information?

In order to protect personal information, we will:

1. Not collect, use or disclose an individual's personal information for any purpose other than those identified above, except with the further consent of that individual (if he/she is an adult, otherwise his/her parent/legal guardian). Consent for any of the identified purposes or for any additional purpose can be provided in writing, orally or electronically. Consent can be express or it may be implied in appropriate circumstances. Express consent happens whenever there is no doubt that an adult individual has expressly told us, in writing, orally or electronically, that we can collect, use or disclose his/her personal information or that of his/her child(ren). Implied consent happens whenever we can reasonably assume, from an adult individual's action or inaction, that we have his/her consent to collect, use or disclose his/her personal information or that of his/her child(ren). We will try to obtain express consent whenever it would be reasonable for an individual to assume that we would do so;
2. Protect personal information with security safeguards that are appropriate to the sensitivity of the information;
3. Protect the confidentiality of personal information when dealing with other organizations;
4. Use reasonable efforts to keep personal information as accurate and up-to-date as is necessary for the purposes for which it is to be used and/or disclosed. The assistance of parents/legal guardians in keeping their and their children's personal information up to date is essential; and
5. Respond to any request that an adult individual may make for access to personal information regarding him/her (or his/her child(ren)). We will need specific information from an individual to verify his/her identity before we can respond to his/her request. In addition, there may be instances where we will not be able to provide an individual with the personal information that he/she has requested. If we deny a request for access to personal information, we will provide the individual with an explanation in writing.

What are your choices?

We would like to have your consent to continue to collect, use and disclose your personal information (and, if you are a parent/legal guardian of one or more children in our care, that of your child(ren) and other individuals who are involved with their care and upbringing) for the purposes identified above. However, you do have choices. You may refuse to provide your personal information (or that of your child(ren)) to us. You may also withdraw your consent for us to collect, use or disclose your personal information (or that of your child(ren)) at any time, subject to legal or contractual restrictions and reasonable notice. However, in either case, this may limit or eliminate altogether our ability to provide any products or services to you (or to your child(ren)), to involve you in other organizational activities and/or to communicate with you.

If you have any questions or concerns about our privacy practices, please contact our Privacy Officer – Susan Emerson by:

1. telephone: 339-4992
2. mail: 123 Red River Blvd
Winnipeg MB
R2V 3X9
3. e-mail: daycare1@mts.net

Otherwise, we will assume that we have your consent to collect, use and disclose your personal information (and, if you are a parent/legal guardian of one or more children in our care, that of your child(ren) and other individuals who are involved with their care and upbringing) (including personal information that we have previously collected) for the identified purposes and in a manner consistent with our Privacy Policy.

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's Internet web site at: www.privcom.gc.ca