

CATEGORY	Information Technology	DEPARTMENT CODE	06
DOCUMENT #	IT-06-PL-Privacy - 001	DOCUMENT TYPE	Policy
DESCRIPTION	Privacy		
DATE APPROVED	August 2025	NEXT REVIEW REQUIRED	August 2028
LOCATION	<u>IT-06-PL-Privacy -001</u>		

1. **PURPOSE**

At SBCI, the protection and appropriate use of personal information is of paramount importance. SBCI collects and uses personal information in order to provide requested advice, guidance, representation, data analysis and required financial reporting on certain employee benefits. Additionally, as an employer, SBCI recognizes the importance of safeguarding personal information of its employees.

2. **GUIDING PRINCIPLES**

SBCI has accordingly adopted key principles, which are intended to do the following:

1. Minimize intrusiveness.
2. Limit the use of personal information.
3. Protect the privacy and confidentiality of personal information in our custody and care.

3. **DEFINITIONS AND SCOPE**

1. Personal information is defined as information about a readily identifiable individual and would include details concerning an individual's age, gender, occupation, health, income and benefits. If information about an individual has been rendered anonymous, it is no longer considered to be personal information.
2. This Policy applies to all SBCI employees, and individuals and enterprises, who by nature of their relationship with SBCI, are entrusted with confidential or sensitive information.

4. KEY PRINCIPLES

1. Lawful Collection

SBCI only collects the personal information that is necessary for the provision of services as requested by our members. This information may come directly from our members, employees of the member school boards, or from organizations where SBCI is appointed as the representative for our member.

2. *Proper-Driven Use*

In the course of day-to-day operations, it is normal for SBCI to open a file or create an electronic record when we receive information from a member that falls within our normal areas of service. SBCI will utilize that information only to provide the member with the type of service that they have requested. Unless we have the consent of the individual concerned, personal information will not be used by SBCI employees for purposes other than in the normal performance of their duties, and the purposes for which it was collected. Equally, school board information will be utilized by SBCI employees only for purposes in the performance of their normal duties.

SBCI will use personal information only in accordance with this Policy, our members' instructions and the law.

3. *Accuracy of Information*

All decisions involving personal information should be based on accurate information. SBCI employees will do their best to base decisions on accurate information. However, we rely on members and organizations such as the WSIB to provide SBCI with accurate information and to inform SBCI of any changes.

Individuals have the right to access their personal information maintained in a file and, if needed, they also have the right to request that any inaccurate information be corrected. This would apply to information on school board employees or SBCI employees.

4. *Access Limited to Authorized Personnel*

Personal information will only be accessible to SBCI employees, contract staff and service providers who require access in the performance of their duties and to any person granted access by the individual; and to those otherwise authorized by law.

5. *Safeguarding Personal information*

Each SBCI employee and representative must abide by our commitment to privacy in the handling of personal information of our members and that of employees and agents with whom they work.

In providing information to organizations or individuals acting on our behalf, we will require such organizations or individuals to abide by our privacy policy.

Disclosure of personal information will always be restricted to those with a right to the information, and in relation to the purpose for which the information was collected.

Personal information will be protected from unwarranted intrusion or release by ensuring that appropriate information security safeguards are in effect.

Notwithstanding the foregoing, SBCI will disclose personal information where required by law to do so.

6. *Retention and Disposal*

The length of time that SBCI retains personal information will vary depending upon the nature of the information and the need to access that information to provide service to our members. SBCI will keep personal information in our records only so long as it is needed for the identified purposes or as required by law. When personal information is no longer required it will be deleted or destroyed.

7. *Non-Compliance*

Violations of these procedures by an employee of SBCI may result in disciplinary action, up to and including dismissal. Legislative penalties may also apply.

8. *Accountability*

Compliance with this Policy shall be overseen by the Manager of Human Resources and Administration. Any concerns or questions may be directed to their attention.

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