

TMS DISCOVERY DAY CAMP PRIVACY POLICY

In complying with the **Personal Information Protection & Electronic Documents Act** (PIPEDA, REVISED 2019), TMS Discovery Day Camp has developed a privacy policy to guard the collection, use and disclosure of personal information.

This privacy policy applies to personal and health information about TMS Discovery Day Camp Campers and their families/guardians.

TMS Discovery Day Camp continues to serve families professionally and is committed to protecting their clients' privacy and the confidentiality of their personal information.

COMPLIANCE & BASIC PRIVACY PRINCIPLES

1. Accountability

The TMS Discovery Day Camp will control and centralize the collection and distribution of information. When TMS Discovery Day Camp transfers personal information to a third party for processing, TMS Discovery Day Camp protects that information by way of a contract or by other means. TMS Discovery Day Camp has designated a Privacy Officer who is responsible for overall personal information protection as well as compliance with PIPEDA.

* For questions and/or concerns, please telephone our office at 905-889-6882.

2. Identifying Purposes

TMS Discovery Day Camp collects information about campers and their families to provide for the best and most appropriate care for the campers, to ensure their safety and welfare, to provide information about new and exciting programs, for business analysis, and to provide follow-up statements of accounts when requested by the parent/guardian.

- **The Camper Application** requests names, addresses, telephone numbers for necessary contact and communication, for transportation, and in case of emergency.
- **Custody** information is important for the campers' safety and welfare.
- **Swim** information assists us in arranging appropriate swim instruction. (When applicable)
- **Personal Description and Personal Remarks and Requests** help us in meeting the personal needs of each camper.
- **Financial** information is collected for TMS Discovery Day Camp to be able to provide and replace any family statements for tax purposes as well for our financial reporting responsibilities.
- **Health Information** and the **Health Form** requests personal health information about the campers, required by Public Health.
- **Special Needs, Allergy Information and Health Concerns** are necessary for the counselor, camp nurse specialists, swim instructors and bus drivers to provide the best care.
- The follow up **Swim Form** asks that all relevant information be updated accurately to enable the swim instructor to be better informed. (When applicable).
- **Photo Images** of campers and their families may only be used for TMS Discovery Day Camp and TMS. For example, brochures, website, advertisements and parent/guardian requests.
- In support of all of the above purposes, TMS Discovery Day Camp may also collect personal information orally and electronically through the year.

3. Consent

TMS Discovery Day Camp obtains consent to the collection, use and disclosure of personal information and personal health information about campers and their families (except where inappropriate). Where the law permits, collection use and disclosure does not require knowledge or consent.

The Form of Consent

In determining the form of consent, TMS Discovery Day Camp considers the circumstances, the type of information and the reasonable expectations of the individual.

For example: TMS Discovery Day Camp seeks written consent from parents/guardians/physicians, when collecting sensitive personal information. Parents/guardians may withdraw their consent at any time, in writing to the Privacy Officer, subject to legal or contractual restrictions and reasonable notice. TMS Discovery Day Camp will carefully explain the implications of the withdrawal.

4. **Limiting Collection**

TMS Discovery Day Camp limits the collection of personal information only to that data which is necessary to assist in fulfilling the identified purposes.

- TMS Discovery Day Camp may collect personal information by written, oral and electronic means.

5. **Limiting Use, Disclosure and Retention**

TMS Discovery Day Camp only uses and discloses the personal information in order to fulfill the identified purposes except when required by law. Only those individuals whose job functions or responsibilities require personal information have access.

- TMS Discovery Day Camp does not sell, lease, or barter personal information.
- TMS Discovery Day Camp retains personal information as long as needed to fulfill the identified purposes or as required by law, whichever is longer.
- When the information is no longer required, TMS Discovery Day Camp uses proper and reasonable methods of destroying information.

6. **Accuracy**

TMS Discovery Day Camp keeps personal information as accurate and up to date as necessary to fulfill the identified purposes. The parents/guardians are obligated to read all statements/forms sent home, and to return all forms, to ensure that their information is accurate, complete and up to date. Parents/guardians should contact and advise our office to up date or correct personal or health information. Our telephone number is 905-889-6882.

7. **Safeguards**

TMS Discovery Day Camp protects personal information by security safeguards appropriate to the sensitivity of the information.

8. **Openness**

- TMS Discovery Day Camp will share its privacy policy through mailings and through any other means that may be appropriate.
- Any changes or additions to the privacy policy will be communicated through a mailing.

9. **Individual Access**

Upon written requests, TMS Discovery Day Camp will provide an individual with access to personal information about that individual, subject to certain legislative exceptions. If the individual is a minor, as all TMS Discovery Day Camp campers are, then TMS Discovery Day Camp will provide personal information about campers to parents/guardians who make a written request. TMS Discovery Day Camp will allow an individual (parent/guardian on behalf of a camper) to challenge the accuracy and completeness of information. TMS Discovery Day Camp will amend this information if appropriate.

10. **Challenging Compliance**

TMS Discovery Day Camp welcomes any questions and concerns about our privacy policy. Please call our office to speak with our Privacy Officer or our Director at 905-889-6882 or write to: TMS DISCOVERY DAY CAMP: ATTENTION: PRIVACY OFFICER. 8569 Bayview Ave. Richmond hill ON, L4B 3M7

- TMS Discovery Day Camp will investigate all concerns and complaints

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NOTE:

This is the privacy policy as referred to in the camp forms including: Camper Application, Family Information, Health Form, Swim Form and Transportation Form.

TMS Discovery Day Camp is a member of the **ONTARIO CAMPING ASSOCIATION**, which sets industry standards to which camp members must adhere.