

## Privacy Policy

**Our Commitment To Privacy:** Toronto Academy of Education (“Toronto Academy”, “we”, “us” or “our”, as the context requires) is committed to protecting your Personal Information (as defined below) through ensuring that all Personal Information provided to us is treated with care and, subject to this Privacy Policy (“**Policy**”), is not used or disclosed in ways to which you have not consented. This Policy governs the collection, use and disclosure of your Personal Information in any communication or interaction you may have with us, whether it be in person, over the telephone, in writing, or electronically.

We comply with all of the requirements of the federal *Personal Information Protection and Electronic Documents Act*, and other applicable provincial legislation. By submitting to us your Personal Information or using our website (the “**Site**”), you accept this Policy and consent to its terms and as otherwise described to you at the time of collection of your Personal Information. If you do not agree with the terms of this Policy, please do not use the Site or otherwise provide your Personal Information to us.

This Policy may be amended at our discretion, without notice to you. Please check back from time to time for such amendments. By continuing to access and use the Site, you agree to the terms of the then-current Policy, as amended.

### Personal Information

“**Personal Information**” is personally identifiable information including your name, age, residential address and e-mail address. Publicly available information, such as business contact information or a public directory listing of your name, address, telephone number or information that is aggregated and not associated with a specific individual, including demographic information and statistics, is not considered Personal Information.

### Collection Of Personal Information

We collect Personal Information by fair and lawful means. We limit the collection of Personal Information to what is necessary for the purpose for which it was collected unless we are required or permitted by law to collect additional information.

Personal Information is collected by Toronto Academy when you provide it to us, such as when you contact us via the Site or call us. We may also collect your IP address when you use the Site and we keep track of your dealings with us, including details of your visits to our Site and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data.



We may also receive Personal Information from our business partners and other third parties, provided that such third parties confirm to us that they have obtained your consent, or we have obtained your consent in this regard.

## **Collect, Use And/or Disclosure of Personal Information**

We collect, use and/or disclose your Personal Information primarily for the following purposes:

- to correspond with you;
- to provide services to you; and
- for any other purposes which you may specify.

Also, you may indicate that you are interested in receiving information from Toronto Academy of Education and/or third parties. If so, your Personal Information will also be used to contact you or to send you e-mail materials and other mailings about products and services that might be of interest to you. We or they may contact you about these products or services by any of the methods that you consented to at the time your information was collected.

You always have the option to tell us not to share your Personal Information with third parties or to exclude you from offers for products or services. Also, we will not refuse to provide a product or service to you if you choose not to provide us with your Personal Information, unless your failure to provide such information makes us unable to provide such product or service.

Limited disclosure of Personal Information to third parties may be required as part of Toronto Academy fulfilling its stated business duties and day-to-day operations, including for billings and payments processed through a third-party payment processor. However, information will only be disclosed to such persons if we have received your consent to do so or they have entered into a written agreement with us to abide by this Policy.

Toronto Academy does not sell or distribute its client lists to any outside party. Toronto Academy may provide aggregate information about our applicants, services selected, and Site information to affiliate organizations, but such aggregate information will not include personally identifying data, except as otherwise provided in this Policy. We may also use this aggregate, non-identifying information for research purposes. This information may be shared with other organizations for the purpose of better understanding and improving services to individuals.

Other than as required by law (for example, in response to a court order or subpoena, or to comply with local or federal regulations), your Personal Information will not be used for any other purpose without your written consent. Toronto Academy will request written consent from you prior to disclosing any Personal Information other than pursuant to this Policy.

## Use Of Cookies and Other Technologies

For the improvement of the Site and client services, the Site makes use of cookies, which automatically collect anonymous user data (such as user traffic patterns and server activity). A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer, allowing the Site administrator to identify your computer and passively track your activities on the Site.

We may use cookies to temporarily store some personal information. Cookies, by themselves, cannot be used to disclose your individual identity. This information identifies your browser, but not you, to our servers when you visit the Site. Most browsers are initially set up to accept cookies, but you can set your browser to refuse cookies. However, if you do not accept cookies, you may be limited in some areas of Site.

The Site may also use Web beacon, gif, or other technologies. When you access certain of our web pages, a non-identifiable notice of that visit is generated. These technologies usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these pages, you can set your browser to turn off cookies. If you turn off cookies, Web beacon and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.

The Site may present links to other websites. You should be aware that operators of linked websites may also collect your Personal Information and information generated through the use of cookies when you link to their websites. Toronto Academy is not responsible for how such third parties collect, use or disclose your Personal Information, so it is important to review their privacy policies before providing them with your Personal Information.

## How Does Toronto Academy Retain and Store the Personal Information We Collect?

We implement security safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. We use physical, organizational, and technological measures to protect Personal Information.



For example, only members of Toronto Academy staff that are authorized users, using a password, can access the data stored in our electronic database, and all paper files that contain your Personal Information in the Toronto Academy office are kept in locked filing cabinets. We also use a secure server, which protects your Personal Information from being observed in transmission by a third party when you are contacting us on our Site. Backup copies of your Personal Information are stored off-site in secure locations. We may use the services of third parties for such storage, or for processing, or other third-party services related to services rendered by us, but we ensure that those third parties agree to only use your Personal Information for specified purposes and that your Personal Information is protected at least as well as it is protected by Toronto Academy, as described in this Policy.

## **Processing Of Personal Information**

Your Personal Information may be processed and stored outside of the province in which it was collected by us or a third-party service provider for the purposes set out in this Policy. We will ensure that any processing or storage of Personal Information outside of the province in which it was collected (including transfers within or outside Canada) is permitted by applicable law prior to permitting same. However, if your Personal Information is transferred outside of Canada, your Personal Information will be subject to the laws of the country in which it is stored. In certain circumstances, foreign courts, law enforcement agencies or regulatory agencies may be entitled to access your Personal Information without notice to you. By submitting your Personal Information, you agree to this transfer, storing or processing.

Please note that no method of transmitting, processing or storing information is completely secure. While we take appropriate steps to safeguard information under our control, there is always a risk that it may be lost, intercepted, altered or misused. There is an inherent risk involved in the exchange of information using any form of communication, such as e-mail, telephone, fax and courier service. We cannot guarantee that exchanges of information will always be received, or that such communications and documents will be virus free. We assume no liability for any loss, costs or damages you may suffer as a result of the loss, interception, alteration or misuse of information during such transfers.

## **How Does Toronto Academy Destroy or Dispose of Personal Information?**

We will keep Personal Information only for as long as it remains necessary for the purposes for which it was collected, or as required by law. Toronto Academy will destroy the paper copies of its files, subject to any limitations that may be required by law, in a secure manner.



Subject to applicable law, Toronto Academy's electronic files, which include images of documents, are kept indefinitely, unless you ask us to delete our electronic files that contain Personal Information about you, in which case we will delete such files in a secure manner.

## How To Access and Correct Personal Information

We want to ensure that information about you is accurate, complete and current. Please inform us of any change of name, address, or other Personal Information.

In addition, you have the right to access the Personal Information that Toronto Academy has collected, stored, and disclosed about you, subject to any legal restrictions. If there are errors in the information in your files, you may request that it be changed. If we have disclosed inaccurate information about you to a third party, we will be pleased to contact the third party in order to advise them of the error.

In order to access this information, you must put your request in writing to the individual referred to below. Please allow up to four weeks for a response.

## Questions

Toronto Academy is accountable for all Personal Information in its control. Toronto Academy has a designated Privacy Officer who is ultimately accountable for the handling of all Personal Information under the control of Toronto Academy of Education. The Privacy Officer is also responsible for ensuring that the principles set out in this Privacy Policy are being complied with. If you wish to challenge our compliance with this policy, if you wish to request access to your Personal Information, or if you have questions about this Privacy Policy or the information that we have collected about you, please contact our Privacy Officer as follows:

**Name: Manisha Yadav**  
**e-mail: [Manisha@torontoacademy.ca](mailto:Manisha@torontoacademy.ca)**  
**Privacy Officer & Chief Operating Officer**

25 Watline Avenue, Unit 204, Mississauga, ON, L4Z 2Z1

[www.torontoacademy.ca](http://www.torontoacademy.ca)

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