

Camp Tournesol's Privacy Policy v. 1.1

(28 August, 2020)

ABOUT Camp Tournesol and Brouillet Academy

Camp Tournesol specializes in language immersion programs for children. From French summer camps and overnight programs to enrich the French immersion and Francophone programs in Ontario. We offer multiple French summer day camps in the Greater Toronto Area as well as French overnight camps in Ontario and programming for schools. Brouillet Academy, a division of Camp Tournesol specializes in academic support to French Second Language Learners, from one-on-one tutoring to virtual group classes. Camp Tournesol is a recognized expert in language immersion for French enrichment for children age 4 to 15.

An important part of Camp Tournesol's commitment to its users and visitors ("you" or "yours") is respect for your right to privacy. Camp Tournesol appreciates the opportunity to provide its services to you and strives to the highest level of service excellence. This means keeping your information and affairs in strict confidence and to be open and transparent regarding our use, disclosure, and practices regarding your personal information. In this document, Camp Tournesol refers to all its product lines and divisions, including the Brouillet Academy.

Camp Tournesol's COMMITMENT

This Policy applies to all your "personally identifiable information" collected, used and disclosed by Camp Tournesol.

The objective of the Policy is to provide an overview of Camp Tournesol's business and reflect Camp Tournesol's commitment to adhere to the legislative requirements of the *Personal Information Protection and Electronic Documents Act* (PIPEDA), and other applicable privacy legislation in Canada, concerning the handling of Camp Tournesol's users' and visitor's personal information.

THE TEN PRIVACY PRINCIPLES

Principle 1 – Accountability

To ensure Camp Tournesol remains accountable for the manner in which it uses, collects and discloses your personal information, everyone at Camp Tournesol is responsible for maintaining and protecting the personally identifiable information to which they have access. In addition, Camp Tournesol has appointed a Privacy Officer, who will be accountable for ensuring its compliance with this Policy.

Questions pertaining to this Policy or the application of this Policy may be directed to:

Privacy Officer
Camp Tournesol
366 Revus Avenue - Unit 25
Mississauga, Ontario, L5G 4S5

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International Tel: +1 (905) 891-1889
North America: 1 (888) 892-1889
Email: cecilia@campt.ca

Principle 2 – Identifying Purposes

When you become a Camp Tournesol user, visit, and/or contact Camp Tournesol, Camp Tournesol collects your personal information for the following purposes:

- to ensure security, reliability, and quality of our networks, services, website and to avoid any tampering, damages, and/or misuse of our networks, services, and website;
- provide the ongoing service;
- to set up your account;
- comply with legal requirements;
- administer and assess your application for participation in any of our camps;
- protect you and Camp Tournesol from error and fraud;
- protect your child/ward;
- for collection of aggregate data to enhance and improve our services; and
- for collection of anonymized aggregate data for research related to improving our services.

Principle 3 – Consent

Most personal information collected by Camp Tournesol is voluntarily supplied by you when you sign up for the services or engage in communications with Camp Tournesol. Therefore, it is important for you to understand that when you supply your information to Camp Tournesol you will give Camp Tournesol your consent to use your and your child's/ward's information according to this Policy. You may, at any time, withdraw your consent; however this will impede Camp Tournesol's ability to fulfill the service. If you are a visitor to Camp Tournesol's website, Camp Tournesol may collect some information about your computer, browser, operating system, and IP address.

Camp Tournesol may also place a cookie on your device to re-identify your device in subsequent interactions.

There is certain other information that Camp Tournesol may collect for which Camp Tournesol will seek your consent prior to doing so.

Principle 4 – Limiting Collection

Camp Tournesol will only collect personal information needed for it to properly conduct its business and only collect it by fair and lawful means.

For these reasons, Camp Tournesol collects different types of information from different types of interactions and/or people. Please note that you may fall under more than one of the below types of people with whom Camp Tournesol interacts.

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From Visitors:

Personal information collected about you is collected and used by Camp Tournesol to communicate with you, for security reasons, quality assurance, and quality improvement, and to fulfil Camp Tournesol's legal and legitimate business requirements:

- Device type
- Browser type
- Operating system type
- IP address
- Location and time
- Any other information that you may share with Camp Tournesol through communications with Camp Tournesol via online form, email, telephone, and/or any letters.

From Registered Users:

Personal information collected about you is collected and used by Camp Tournesol to communicate with you, for security reasons, quality assurance, quality improvement, service provisions, assessment of your application, and to fulfil Camp Tournesol's legal and legitimate business requirements, and for some limited marketing purposes:

- Device type
 - Browser type
 - Operating system type
 - IP address
 - Name
 - Mailing address
 - Email address
 - Telephone number
 - Mobile number
 - Your financial information
 - Children/wards name and birthdate
 - Any other relevant information of your child as set out in the relevant application and medical forms such as:
 - medical information of your child/ward
 - name and number of additional emergency contact (other than parents/guardian)
 - the school the child/ward attends.
 - medication that the child/ward is required to take and any administration and storage instructions and any possible side effects.
 - physician's name.
 - allergies and signs/symptoms of allergic reaction.
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- photo of child/ward.
- Any other information that you may share with Camp Tournesol through communications with Camp Tournesol via online forms, emails, telephone, and/or any letters
- Any other information that you may share with Camp Tournesol through your and your child's/ward's use of the Service.

Principle 5 – Limiting Use, Disclosure, and Retention

Camp Tournesol is committed to a high standard of confidentiality and privacy. Camp Tournesol will only use and/or disclose your personal information for the reason(s) it was collected. This means that Camp Tournesol will share your personal information with you for the purpose of fulfilling the service requested, and may share specific personal information with third parties engaged to assist us in providing the service requested. These service providers are prohibited from using your personal information for any purpose other than to provide this assistance, and they are required to protect all personal information and comply with the general privacy principles described in this Policy. We also share your name, spouse's name, email address, and mailing addresses with the organization called Canadian Parents for French (www.cpf.ca) for the purpose of creating your profile in CPF's database to become a member of CPF. If you would like not to become a member, please contact CPF to cancel your membership. It is free of charge.

Under no circumstances do we share your and your child's/ward's personal information with third parties without your consent, unless there is a requirement to do so by law.

Camp Tournesol has a Policy in place that governs the retention of your personal information. We will only retain your and your child's/ward's personal information for as long as it fulfills its intended purpose, or as legally required.

Principle 6 – Accuracy

Camp Tournesol is committed to maintaining the accuracy of your and your child's/ward's personal information and ensuring that it is complete and up-to-date. In most cases Camp Tournesol collects your and your child's/ward's personal information directly from you. If you discover inaccuracies in Camp Tournesol's data, please notify Camp Tournesol's Privacy Officer so that Camp Tournesol can make the necessary changes.

Principle 7 – Safeguards

Your and your child's/ward's personal information is secure within Camp Tournesol, regardless of the format in which it is held. Camp Tournesol has comprehensive security controls to protect against unauthorized use, access, alteration, duplication, destruction, disclosure, loss or theft of your and your child's/ward's personal information.

Camp Tournesol maintains physical, electronic and procedural safeguards to protect your and your child's/ward's personal information. Examples of safeguards include restricted access to our information processing and storage areas, limited access to relevant information by authorized

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persons only, use of passwords, firewall technology, encryption of electronically transmitted information, antivirus software and the use of physical security measures, including secure locks on filing cabinets and doors.

Camp Tournesol is also committed to working with you to protect the security of personal information during any transfer to or from Camp Tournesol. And Camp Tournesol has agreements and controls in place with third party service providers requiring that any information provided to Camp Tournesol be transmitted and safeguarded with the highest technological security standards in mind.

The Privacy Officer will conduct periodic reviews of various Camp Tournesol practices to determine compliance with this Policy. The Privacy Officer will make all recommendations necessary to ensure compliance and determine whether any revisions to this Policy are required in light of new practices, processes, technologies or other changes.

Principle 8 – Openness

Camp Tournesol will disclose to its visitors and users this Policy and make information available concerning the policies and practices that apply to the management of their personal information.

Principle 9 – Individual Access

In the course of interacting with Camp Tournesol, you are welcome to review or verify your and your child's/ward's personal information. Camp Tournesol may need specific information from you and your child's/ward's to enable Camp Tournesol to search for, and provide you with, the personal information Camp Tournesol holds about you and your child/ward. Please note that access to your and your child's/ward's personal information is in accordance with Camp Tournesol's retention and access policy.

Principle 10 – Challenging Compliance

Any concerns regarding Camp Tournesol's compliance with this Policy can be reported in writing to the Camp Tournesol Privacy Officer:

Privacy Officer
Camp Tournesol
366 Revus Avenue - Unit 25
Mississauga, Ontario, L5G 4S5

International Tel: +1 (905) 891-1889
North America: 1 (888) 892-1889
Email: cecilia@campt.ca

If you have concerns about how Camp Tournesol handles your and your child's/ward's personal information, please note that you may always contact the independent oversight body:

Office of the Privacy Commissioner of Canada

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Place de Ville
Tower B
112 Kent Street
Ottawa, Ontario K1A 1H3

Toll Free: 1-800-282-1376
