

WEBBER ACADEMY FOUNDATION EMPLOYEE AND VOLUNTEER PRIVACY POLICY

Webber Academy Foundation (“**Webber**”) is committed to maintaining the confidentiality, security and accuracy of the Personal Information entrusted to us by our employees and volunteers (collectively, “**Employee**” or “**Employees**”). Webber’s privacy policy (the “**Privacy Policy**”) describes the information that Webber collects and how it is handled.

This Privacy Policy is intended to meet or exceed Webber’s obligations arising under any applicable privacy legislation.

What is Personal Information?

For the purposes of this Privacy Policy:

“**Personal Information**” means information about an identifiable individual, but does not include Business Contact Information. Personal Information may include, but is not limited to, an individual’s name, address, gender, date of birth, language preference, personal email address, telephone number, emergency contact information, social insurance number, Alberta teaching certificate number, post-secondary degree, criminal record, health information and credit card information.

“**Business Contact Information**” means any information that is used for the purpose of communicating or facilitating communication with an individual in relation to his or her business or profession such as the individual’s name, position name or title, work address, work telephone number, work fax number or work email address.

What Personal Information does Webber Collect, Use or Disclose?

Webber collects, uses and discloses Personal Information about Employees in order to establish, manage and terminate the employment relationship and for other purposes identified when the Personal Information is collected. Specifically, Webber may collect, use or disclose Personal Information for the following purposes:

- recruiting and hiring for positions with Webber, including criminal record checks and references regarding Employees;
- payroll and related information, including social insurance number, rate of pay, hours of work, deductions, TD1 forms, attendance and vacation records, any garnishing orders, authorizations to pay or assignments, pension and insurance information and direct deposit information;
- benefit information, including information on enrollment forms, dependant and beneficiary information and information necessary for benefit administration;
- performance information, including attendance, work history, performance reviews, discipline, training forms, documentation related to job qualifications (including professional or technical qualifications) and internal competition information;
- health and safety information, including notes from medical professionals and Workers’ Compensation documentation;

- security and access cards;
- marketing and promotion of Webber through the intranet, internet and Webber's website and in directories, brochures, announcements, advertising and other marketing, promotional and informational materials;
- as permitted by and to comply with any legal or regulatory requirements and laws; and
- for any other purpose to which Employees consent.

Generally, Webber collects Personal Information directly from Employees. If third parties hold Personal Information that Webber requires, it will endeavor to ensure appropriate consent is obtained as applicable.

How will Webber Disclose Personal Information?

Webber discloses Personal Information about Employees for the purposes of establishing, managing and terminating the employment relationship, and for other purposes identified when the Personal Information is collected, or as permitted or required by law. Specifically, Webber may disclose Personal Information to third parties for purposes related to the employment relationship, including, but not limited to:

- third party service providers, including an organization or individual retained by Webber to perform functions on its behalf, such as data processing, program administration and document management;
- government bodies and agencies, such as Canada Revenue Agency and the Workers' Compensation Board, for payroll and related premium assessment and health and safety purposes or otherwise required by law;
- insurance companies, benefit, pension and group RRSP administrators for enrollment in and administration of benefits, plans and claims;
- advisors, including accountants, lawyers and consultants;
- affiliates and business associates as reasonably required in connection with the operations of Webber, including payroll and benefit information and other information necessary for the provision of management and human resources services; and
- any third party, where Employees consent to such disclosure or where disclosure is required or permitted by law.

Webber will not disclose Personal Information for purposes other than those identified at or before the time of collection, except with the Employee's consent or as required or permitted by law.

Webber may disclose or transfer certain Personal Information to third party service providers and to affiliated entities for the performance of specialized services, such as printing, payroll services, market research or data processing. Prior to making any disclosure, Webber will take appropriate steps to ensure that such recipients safeguard the Personal Information, use the information only for authorized purposes and comply with any applicable laws.

Safeguarding Personal Information

Webber will endeavor to safeguard Personal Information using methods that are appropriate to the sensitivity of the information. Specifically, Webber takes the following steps to safeguard any Personal Information that it collects:

- using appropriate security measures when destroying Personal Information, including shredding paper records and permanently deleting electronic records;
- managing electronic files appropriately with passwords and security measures that limit access by unauthorized personnel and reviewing security practices periodically to ensure that the privacy of Personal Information is not compromised; and
- retaining Personal Information only as long as is reasonable for legal or business purposes.

Accuracy of Personal Information

Personal Information is kept as accurate, complete and current as appropriate. Employees are responsible for providing Webber with any changes in Personal Information so that records may be accurately maintained.

No Expectation of Privacy

Employees have no expectation of privacy while using property owned or leased by Webber whether the property is used for personal or business purposes.

While Webber has no intention of placing Employees on constant surveillance, information passing through or stored on Webber's property can and will be monitored at the discretion of Webber. Webber maintains the right to monitor and review internet use, voicemail communications, fax and email communications sent or received by Employees.

Webber reserves the right to perform searches of Webber's property, which discretion will be exercised reasonably.

Any Personal Information that is obtained through one of these searches may be collected, used, disclosed or stored for the purpose of a workplace investigation or for any other appropriate purpose for the management of Employee's employment or Webber without further notice than contained herein.

Employee's Responsibilities

Employees are responsible for furthering the objectives of the Privacy Policy and Webber's General Privacy Policy. Employees are expected to handle the Personal Information of others in accordance with the Privacy Policy and Webber's General Privacy Policy.

Any findings of misconduct or breaches of employment found under the application of the Privacy Policy can subject the Employee to discipline up to and including termination of employment for just cause.

Contacting Webber's Privacy Officer

Questions and concerns about the Privacy Policy should be directed to the Privacy Officer:

Neil Webber
President and Head of Webber Academy Foundation
1515 93 Street SW
Calgary, AB T3H 4A8
Tel. 403-277-4700
Fax. 403-277-2770
Email nwebber@webberacademy.ca

Changes to the Privacy Policy

Webber may from time to time make changes to the Privacy Policy without advance notice to reflect changes in its legal or regulatory obligations or in Webber's discretion.

Employees are expected to review and stay current on the Privacy Policy regularly.