

# Privacy Policy — Ace Acumen Heights (AAH)

~ Effective date: October 08, 2025

Ace Acumen Heights (“AAH”, “we”, “us”) is committed to protecting personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard personal information while operating our school and our websites (including aaahs.ca). We follow applicable laws, including Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA), Ontario’s Education Act and OSR Guidelines, and Canada’s Anti-Spam Law (CASL).

## Definitions

### *For the purposes of this Policy:*

- **“Personal information”** means information about an identifiable individual and does not include business contact information such as name, title, business address, or business telephone number.
- **“parent”** means a parent, guardian, or other legal representative of a student.
- **“student”** means a prospective, current, or former student of AAH.
- **“collect”** means to gather, receive, or record personal information by any method.
- **“use”** means to handle or process personal information for any purpose.
- **“disclose”** means to make personal information available to someone outside AAH.
- **“record”** includes any medium on which information is recorded (e.g., paper files, electronic files, photographs).
- **“Third party”** means an individual or organization other than AAH and its employees.

## Statement of Policy

AAH is committed to the following privacy principles. These principles guide our handling of personal information.

### 1. Accountability

AAH is responsible for personal information under its control, including information transferred to third-party service providers for processing, storage, or other services. We designate individuals who oversee privacy compliance and respond to questions.

### 2. Identifying Purposes

We identify the purposes for which personal information is collected before or at the time of collection. Examples include:

- Communicating with students and parents; processing applications and assessing suitability for admission, grade placement, or specific programs.
- Administering and delivering educational and co-curricular programs and student supports.
- Operating administrative functions (e.g., fee payment and collection; billing and accounting; school operations; parent/volunteer engagement; fundraising).
- Maintaining building and campus security (e.g., visitor sign-in/out, security cameras where in use).
- Sharing important information with staff related to student health or safety to maintain a safe, inclusive, and harassment-free environment.
- Monitoring use of AAH facilities and IT resources in accordance with AAH policies and guidelines.
- Keeping the AAH community informed of school activities, events, opportunities to volunteer, and fundraising initiatives.
- Complying with legal, regulatory, or Ministry of Education requirements.

### **3. Consent**

We obtain consent to collect, use, or disclose personal information unless otherwise permitted or required by law. Consent may be expressed or implied (for example, when information is provided to us for an identified purpose).

By registering a child at AAH, parents/guardians grant permission for AAH to use photographs, video, voice, or other digital artifacts that may include their child for school purposes, including promotional materials. We will not publish students' full names alongside images on public websites or social media without additional consent. On secure, password-protected systems used to administer academic programs, student names may appear where necessary.

We will seek specific consent for certain disclosures not covered by this Policy, including providing information to service providers for community engagement or fundraising; sharing records with other educational institutions at a family's request; and sharing health, psychological, or legal information with outside professionals involved in student support.

### **4. Limiting Collection**

We collect only the personal information necessary for identified purposes by fair and lawful means. Much of the information we hold is provided directly by parents/guardians or students or is created during a student's education at AAH.

Examples of personal information we collect and maintain include (as applicable):

- Identifiers and contact details (e.g., name, age, gender, home-address, phone, email, emergency contacts, photographs for identification/security).
- Health and medical information (e.g., physician contact, allergies, conditions) necessary to support student safety and well-being.
- Information required to administer fees, billing, and collections.
- Information required for campus and IT security.
- Any information required or authorized by law.

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

We use and disclose personal information only for the purposes identified, unless additional consent is obtained or the use/disclosure is permitted or required by law. Third-party service providers are bound by appropriate agreements to protect confidentiality and use information only to provide services to AAH.

We retain personal information only as long as necessary for school operations or as required by law, after which it is securely destroyed or anonymized.

Disclosure without consent may occur where permitted or required by law, including, for example:

- Family court matters, legal proceedings, court orders, government reporting, or Ministry of Education purposes.
- To prevent or detect crime or statutory offences.
- To comply with valid legal processes such as search warrants, subpoenas, or court orders.
- To government bodies that lawfully require such information.
- Where necessary to protect the life, health, or safety of an individual.
- To law enforcement or investigative agencies where there are serious reasons to believe a fraud or offence may have been committed.
- In such cases, we disclose only what is reasonably necessary.

## **6. Accuracy**

We aim to keep personal information accurate, complete, and up-to-date for its intended purposes. Individuals may request access to review and correct their information. Families should promptly inform AAH of changes to contact or medical information.

## **7. Safeguards and Security**

We use administrative, technical, and physical safeguards appropriate to the sensitivity of the information to protect against loss, theft, and unauthorized access, use, disclosure, copying, modification, or disposal.

Examples include:

Confidentiality obligations and training for employees who access personal information in the course of their duties.

Secure storage of student files with access limited to personnel who require it to perform their roles.

Password and access controls, network security, and periodic review of security practices to help protect electronic records.

Use of reputable cloud service providers. Some information may be stored or processed outside Ontario/Canada and may be accessible to authorities in those jurisdictions.

## **8. Access and Inquiries**

Upon written request and subject to legal restrictions, individuals have the right to access personal information about them held by AAH, learn how it has been used, and to whom it has been disclosed. We will respond within a reasonable time.

In certain cases, access may be limited (e.g., where disclosure would reveal personal information about another individual, information collected in an investigation, or where disclosure could threaten safety). If access is refused, we will provide reasons, subject to legal constraints.

### ***Questions or Concerns***

Questions about this Policy or AAH's privacy practices may be directed to AAH's Privacy Officer at [privacy@aahs.ca](mailto:privacy@aahs.ca) or through the school's administrative office.

We may update this Policy from time to time. The effective date above indicates the most recent revision.