



CM Global English

Personal Information Protection Policy

At CM Global English, we are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients' students, protecting their personal information is one of our highest priorities.

While we have always respected our clients' students' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their students' personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients' students' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our student personal information and allowing our clients to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual student*. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that CM Global English complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal student information are obvious and the client voluntarily provides students' personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect student information that is necessary to assist the client in identifying which student took the CM Global English assessment. **The only information we collect is the student's name and the grade range (late primary, intermediate, or secondary) of the student.**

Policy 2 – Consent

- 2.1 We will obtain client consent to collect, use or disclose student personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.
- 2.3 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent for CM Global English to use their students' personal information in certain ways. A client's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client in making the decision.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose client's student personal information where necessary to fulfill the purposes identified at the time of collection, which is to connect student names with the assessments taken.
- 3.2 We will not use or disclose client's student personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell client's student lists or student personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use a client's student personal information to make a decision that directly affects the client, we will retain that student personal information for at least one year so that the client has a reasonable opportunity to request access to it.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that client's student personal information is accurate and complete where it may be used to make a decision about the student.
- 5.2 Clients may request correction to their student personal information in order to ensure its accuracy and completeness.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to our client.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client's student personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that client student personal information is appropriately protected:

Security policies in force as per AT 101 SOC 2 Type II certifications and data centre staff have RCMP criminal record checks. The data centre is equipped with state-of-the-art security technology, with 24/7 video security recording, monitored entry alarm, and 4 factor authentication. CMGE servers have intrusion detection and prevention software. CMGE staff that have access to program code and student data have signed NDA's and privacy agreements.

6.3 We will use appropriate security measures when destroying student personal information such as physical destruction of hard drives.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Clients Access to Personal Information

7.1 Clients have a right to access their student personal information.

7.2 A request to access student personal information can be made orally or in writing.

7.3 Upon request, we will also tell clients how we use their student personal information and to whom it has been disclosed if applicable.

7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

8.1 The Privacy Officer is responsible for ensuring CM Global English's compliance with this policy and the *Personal Information Protection Act*.

8.2 Clients should direct any complaints, concerns or questions regarding CM Global English's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for CM Global English's Privacy Officer:

Anthony Carrigan

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