

Alberta Ballet School
Privacy and Student Data Protection Policy

Alberta Ballet School ("we," "our," or "us") is committed to protecting the privacy of students, visitors to our website and others who may share personal information with us. This Privacy Policy explains our personal information handling practices for personal information that is provided to us, and outlines our obligations, and your rights regarding your personal information.

1. Defined Terms

In this Privacy Policy, the following terms have a defined meaning:

"Personal Information" means any information about an identifiable individual including information that relates to their personal characteristics including, but not limited to citizenship status, gender, date of birth, age, home address or phone number, medical information (which may include height and weight), video or audio, photographs, payment information, reference letters. Personal Information also includes Student Data. Personal Information, however, excludes business contact information.

"Privacy Policy" means this Privacy and Student Data Protection Policy, as updated from time to time.

"Program" refers to any of the programs we offer, including Grades 7-12 Professional Programs, Post-Graduate Programs, Alberta Ballet Trainee Programs, Residence Programs, and any other classes, programs, events that we provide from time to time.

"Student Data" means information related to enrolment, participation, and attendance within our Programs, including student identification number, resumes, fitness results, performance results, certifications, awards, feedback from instructors or adjudicators, and education records such as learning assessments, test scores, discipline results, attendance records, records of achievement or progress in the applicable courses, classes and programs. This may include medical or allergy information.

"website" refers to any of the sites we operate including AlbertaBalletSchool.com and MyAlbertaBalletSchool.com

2. What Information Do We Collect?

We collect only the information that is necessary for the purposes outlined in this Privacy Policy. We collect the following types of information:

- Personal Information: When you fill out a contact form, register for Programs, make purchases, or subscribe to communications (such as our newsletters or marketing communications), we may collect your name, email address, phone number, and payment details.
- Technical Data: When you visit our website, we collect data such as IP addresses, browser type, and website usage analytics through cookies and tracking technologies. (See Section 9: *Cookies, Tracking and AI Technologies*.)
- Student Application Information: If you apply to Alberta Ballet School for any Programs, we collect additional information relevant to the application, audition, and admissions process. We may also ask for self-disclosure of cultural background, ancestry, gender orientation, or ability where the choice to declare is completely voluntary, and the purpose is to help us understand demographics of applicants and students.
- Student Data: For students attending any of our Programs, we collect additional Student Data, as defined above, to the extent such data is relevant to the administration of the Program in which you are enrolled.

- Other: We may from time to time collect video or photographs in the course of promoting our Programs, or for social media marketing – for example, a video or photo of a classroom setting, rehearsal, or performance, based on consents that we obtain from students as part of the registration process for our Programs.

We collect only the information that is necessary for the purposes outlined in this Privacy Policy.

3. How Do We Collect Personal Information?

We collect Personal Information when it is supplied to us by you, or in the case of minor students, when it is supplied by the student's parent or guardian.

In the case of Student Data, we collect education records (such as learning assessments, test scores, attendance records) from instructors, adjudicators, and educational personnel who are teaching and administering the Programs in which the student is enrolled.

In some cases, such as website visits, we may collect technical data automatically, such as IP addresses, browser type, and website usage analytics (See Section 9: *Cookies, Tracking and AI Technologies.*)

4. Consent

By providing Personal Information to us, or applying for Programs, you consent to the collection, use, and disclosure of your information for the purposes described in this Privacy Policy.

By using our website, you consent to the collection of certain information such as technical data that is described above in Section 2 (*What Information Do We Collect?*).

You have the right to withdraw consent at any time by providing reasonable notice to us at our email address in Section 14 (*Contact Us*). However, any request to withdraw consent may impact our ability to provide the Programs to you, or your ability to participate in those Programs. In the case of our website, the withdrawal of consent may impact certain features or functionality of the sites.

5. How We Use Your Personal Information

It is our intent that you will always know how your Personal Information is being used by us.

We use your information for the following purposes:

- To process applications, auditions, admissions, registrations, and payments for our Programs.
- To provide you with updates and newsletters (unless you have opted-out of receiving such communications).
- For promotional materials, and social media marketing, as permitted under this Privacy Policy.
- To improve our Programs, and to improve website functionality and user experience.
- To comply with legal and regulatory requirements.
- As otherwise permitted under this Privacy Policy or applicable privacy laws.

We may generate collated aggregate anonymized data in a reporting format in which individuals are not matched to their identifying information, for example, to help us understand the demographics of applicants, students, or donors.

Where we ask for profile or demographic information, we take precautions to protect individuals from bias that can result from self-disclosure, for example, in situations where we request voluntary declaration of cultural background, ancestry, gender, orientation, or ability.

If Personal Information is to be used for a purpose not previously identified, we will contact that specific individual or to the group of which that individual is a member, prior to use for the new purpose, and we will seek consent for that use.

Except as permitted by applicable law or this Privacy Policy, we do not engage in selling Personal Information, or data-matching to produce data derived from Personal Information about an identifiable individual. Data-matching will only be permitted for internal research and analysis, and for planning, administering, delivering, managing, or evaluating one of our Programs, or as otherwise permitted by applicable privacy laws. For example, we may engage in data-matching to identify and eliminate duplicate records, or to enhance data accuracy and consistency for the purposes described in this Privacy Policy.

6. Sharing and Disclosure of Personal Information

We share Personal Information with certain trusted partners in the following specific circumstances:

- We may share Personal Information as approved by you when required for payment processing in accordance with industry standards.
- We may share Personal Information as approved by you, and as required for delivering Programs to you.
- We use ActiveNet (or another third-party registration and membership management software provider that we may designate in the future) to store and manage Personal Information for administration of our Programs.
- We use Hubspot (or another third-party email content management system provider that we may designate in the future) to collect email address and name information, in order to communicate relevant information with you for the purposes outlined in this Privacy Policy.
- We may share Personal Information with members of our immediate Alberta Ballet family of organizations: Alberta Ballet School, Alberta Ballet, and the Alberta Ballet Foundation. We only share Personal Information with Alberta Ballet to coordinate the administration of Programs in which Alberta Ballet is directly involved. We may share information with the Alberta Ballet Foundation for the purposes of tracking and analyzing trends, demographics, and reporting to donors.
- We may hire certain outside contractors to perform services or functions on our behalf (such as technical support, web development, and graphic design). We will only provide those contractors with Personal Information if they strictly need to have access to complete the service. They are not permitted to use Personal Information for any other purpose and are obligated to keep your Personal Information confidential.

Other than as permitted by this Privacy Policy or applicable privacy laws, we do not share your Personal Information.

7. Children's Privacy Protection

We take the protection of Student Data very seriously, especially the Personal Information of minor students.

We only collect registration information from minors where the parent or guardian has approved or consented to the collection of Personal Information. The Personal Information of minor children may also be collected in the course of participating in any of our Programs – as an example, Student Data will be collected and used by us for a minor student during the Program.

We do not knowingly collect personal data from children under 13 without appropriate consent.

8. Security of Your Personal Information

We take the protection of your Personal Information very seriously. We implement reasonable security measures to protect Personal Information from unauthorized access, loss, or misuse. Internal data is shared through secured transmissions and maintained in secured databases. However, no organization can guarantee absolute security.

9. Cookies, Tracking and AI Technologies

If you visit our website, we reserves the right to store information on a visitor's computer in the form of a "cookie" or similar file or technology for purposes of logging certain details about the individuals who visit our website for statistical purposes: internet address, domain name, date and time of visit to the website, pages and documents downloaded, previous website visited and type of browser used. This information is only used for statistical and website development purposes. If you visit our website, you do so voluntarily and are deemed to consent to our collection of this information as specified in this paragraph. You can manage your cookie preferences through your browser settings.

If we use artificial intelligence (AI) technologies, such use will not involve the disclosure of Personal Information to the AI provider, or the use of Personal Information for any training of AI algorithms. We do not use artificial intelligence technologies to engage in any automated decision-making using Personal Information.

10. Retention of Personal Information

Under Canadian privacy legislation, we cannot retain Personal Information any longer than is reasonably necessary. We retain Student Data as mandated or permitted under applicable law.

We respect your right to have your Personal Information erased from our systems, upon written request and in limited circumstances. Where legally permissible, we will take reasonable steps, including technical measures to erase your Personal Information which is held by us.

11. Access to Information and Corrections

You have the right to request access to your Personal Information, and request corrections or deletions of inaccurate information. If you wish to do so, please contact us at the email address in Section 14 (*Contact Us*).

12. Responding to Personal Data Breaches

In the event of a Personal Data Breach, in certain circumstances we are legally obliged to report the breach to the appropriate Information and Privacy Commissioner. In accordance with applicable privacy legislation, we will also notify the individuals directly affected by the breach, as appropriate in the circumstances. In this Section, the term 'personal data breach' means a breach of security leading to the unauthorized disclosure of, or access to, or the accidental or unlawful destruction, loss, alteration of Personal Information held by us.

13. Review and Change Process

We will review and may update this Privacy Policy periodically to address changes in technology, laws, regulations, practices or circumstances. Any significant changes will be communicated to students and stakeholders, and the updated version will be posted to our website. The updated version will take effect 10 days after posting.

14. Contact Us

For inquiries related to this Privacy Policy, please contact:

Alberta Ballet
141-18th Avenue SW
Calgary, Alberta, Canada T2S 0B8
Email: Info@AlbertaBallet.com