



Schedule D

Privacy and Video Surveillance Policy

1. AAPS has created this privacy and Video Surveillance Policy in order to demonstrate its commitment to privacy and the protection of your personal information. This policy is subject only those other limitations on privacy as described in the Rider to this Agreement. Please read this policy to understand how your personal information will be treated.
2. AAPS collects information in several ways. Some personal information is gathered if you register with us. During registration, AAPS will ask for personal information such as your name, email address, gender, residential address, permanent address, cell phone number, occupation, industry and personal interests.
3. We may ask you for personal information outside of the context of registration, including (but not limited to) when you download a file (such as a .PDF file) from AAPS; when you ask us to contact you; when you join our mailing list; and when you report a problem relating to the services we provided or the courses offered. If you contact us, we may keep a record of that correspondence.
4. When prospective students, i.e. candidates provide us with information such as their name, mailing address, telephone number, and e-mail address, we use this contact information to send these candidates additional information about AAPS. A candidate's contact information may also be used by us to contact him or her directly. Candidates may choose not to receive future mailings or other communications from AAPS at any time by notifying our Chief Privacy Officer at the address below.
5. We will not sell or rent your personal information to third parties without obtaining your informed consent. Generally, the College does not sell or rent personal information in any event.
6. AAPS' website provides much information spanning many topics. While AAPS attempts to provide accurate information to its site users, it provides no guarantees regarding the accuracy or reliability of this content. AAPS' website and/or any content on the internet relating to AAPS, does not constitute a contract or promise from AAPS to its site users, be they prospective students, students, or otherwise.
7. AAPS' website has security measures and safeguards in place to protect against the loss, misuse, and alteration of the information that is under our control at any given time. However, since no data transmission over the Internet is completely secure, we cannot ensure or warrant the security of any information you transmit to us or in relation to our online products or services, and you do so at your own risk. Once we receive your transmission, we make every attempt to ensure that it is kept secure with us. You must still be solely responsible for maintaining the secrecy of your passwords and/or any account information.
8. We may use "cookies" to store and sometimes track information about you. A cookie is a small amount of data that is sent to your browser from our web server and stored on your computer's hard drive. We may do this in order to further automate our website or online forms, or to help us understand who may be interested in our programs. By modifying your own browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies.
9. Subject to any legislated exemptions which would permit us to disclose your personal information as is necessary, we will not disclose any of your personal information except when we have your informed consent. "Personal Information" is defined broadly by governing legislation as any information about an identifiable individual except the name, title, and business address or office telephone number of an employee of an organization.
10. Pursuant to allowable exemptions under current legislation, we may disclose personal information when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be violating AAPS' policy, violating any law of the province of Ontario or Canada, or may be causing injury to or interference with (either intentionally or unintentionally) AAPS' rights or property, other Students or faculty members, or anyone else who could be harmed by such activities. We may also disclose your personal information to a collection agency for the purposes of the lawful collection of a debt owed to us by you.
11. Our policy with respect to the use, collection, retention, and disclosure of all student records is governed by applicable privacy legislation as well as the relevant provisions of the *Ontario Career Colleges Act, 2005*, Ontario Regulation 415/06, and any policy directives by the Superintendent of Career Colleges.



12. We make every attempt to periodically update our Privacy Policy such that it is in compliance with governing privacy legislation, legislation administered by the Ministry of Training Colleges and Universities, and is in general conformity with best practices.
13. AAPS also abides by the Privacy Commissioner's guidelines released on March 6, 2008, regarding Video Surveillance Policy. To summarize, to the extent that it uses or will seek to use video surveillance, AAPS will
 1. Ensure there is a justifiable business purpose for the surveillance;
 2. Seek to avoid capturing the images of people not being targeted for some specific, legitimate purpose;
 3. To the extent possible, seek to not use cameras in areas where people have a heightened expectation;
 4. To the extent possible, seek to notify students and other individuals about the use of cameras before those individuals enter the premises;
 5. Subject to some legal justification to withhold and unless the data is destroyed, provide access to Individuals whose images are captured on videotape;
 6. Ensure that video surveillance equipment and videotapes are secured and used for authorized purposes only;
 7. Ensure that to the extent that recorded images are stored, that they are stored in a secure location with limited access.
14. Should you have a question or concern about our Privacy and Video Surveillance Policy or our practices in this regard, please contact the counselor specifically assigned to you. Or contact Laleh Bighash, Chief Privacy Officer, at 416-502-2277.