

VentureKids

Privacy Policy (Effective November 2019)

Table of Contents

INTRODUCTION	1
WHAT IS 'PERSONAL INFORMATION'?	2
OUR SERVICES	2
WHAT INFORMATION DO WE COLLECT AND WHY DO WE COLLECT IT?	2
HOW DO WE COLLECT YOUR PERSONAL INFORMATION?	3
TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?	4
WHERE DO WE STORE YOUR PERSONAL INFORMATION?	5
HOW DO WE RESPECT CHILDREN'S PRIVACY ONLINE?	5
HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?	5
HOW DO WE PROTECT YOUR INFORMATION?	6
HOW DO I DELETE OR CORRECT INFORMATION YOU HAVE ON ME?	6
UPDATES TO THIS PRIVACY POLICY	6
HOW DO I REPORT A CONCERN ABOUT MY PERSONAL INFORMATION?	7
HOW DO I MAKE A COMPLAINT?	7

INTRODUCTION

This privacy policy ("**Policy**") outlines how VentureKids Tech Organization operating with the name "**VentureKids Canada**" (referred to in this policy as "**we**", "**VentureKids**", "**us**", or "**our**") collects, uses, discloses and otherwise manages your personal information, including in connection with your use of our services: teaching underrepresented and underserved students entrepreneurship, coding fundamentals and more to be ready for Canada's digital economy (the "**Services**").

Additional information about our Services can be found below (under 'Our Services' heading) or on our website at www.venturekids.ca (the "**Website**"). Please review the following carefully so that you understand our privacy practices.

Where we use the words "include", "includes" or "including", it means 'includes but is not limited to', meaning that the list of items are examples and not an exhaustive list.

WHAT IS ‘PERSONAL INFORMATION’?

Personal information is information that, on its own or combined with other pieces of information, can identify you as an individual (“**Personal Information**”).

Examples of Personal Information can include your:

- name, date of birth, gender;
- identification (“ID”) numbers such as your Social Insurance Number;
- home address, e-mail address, phone number;
- evaluations, comments, opinions; or
- IP address, device ID, and information about services you use.

OUR SERVICES

We provide the following programs to our students (collectively referred to hereafter as our “**Programs**”):

- Venture Code: for students aged 9 to 14 who are taught how to create interactive websites and multimedia stories that allow them to turn their ideas into works of art (“**Venture Code**”);
- Venture Startup: for students aged 14 to 19 who are taught how to code and how to turn their ideas into sustainable businesses (“**Venture Startup**”); and
- Other Programs: VentureKids may also provide other Services from time to time (“**Other Programs**”).

In order to participate in our Services, Personal Information must be provided by parents or legal guardians of students who are under the age of 18.

WHAT INFORMATION DO WE COLLECT AND WHY DO WE COLLECT IT?

We collect your Personal Information for the purposes of providing you with our Services and to provide you with appropriate resources. This may include the following:

What Personal Information might we collect?	For what purpose would we collect the Personal Information?
First and last name	<ul style="list-style-type: none">● To verify your identity● To register for and identify students of our Programs

	<ul style="list-style-type: none"> ● To register volunteers ● To identify parents/guardians of prospective and actual students
Gender and ethnicity	<ul style="list-style-type: none"> ● To provide students with relevant resources ● For data analytics purposes including to track whether VentureKids is providing a diverse and inclusive environment
E-mail address and phone number	<ul style="list-style-type: none"> ● To communicate with you ● To send information that you have requested or opted-in to receive ● To notify you of changes to our Service, policies or agreements
Date of birth	<ul style="list-style-type: none"> ● To place students and volunteers in an appropriate Program ● For analytical purposes
PayPal information for donations	<ul style="list-style-type: none"> ● If you donate to VentureKids online, we collect your PayPal account name and city associated with the account
Financial information	<ul style="list-style-type: none"> ● Household income or student income (where applicable) to assess Program eligibility
Photographs	<ul style="list-style-type: none"> ● For promotional purposes of the Service, the Programs and Students, if we have your consent to do so ● Please visit our Website to read more
Residential location	<ul style="list-style-type: none"> ● To register students and volunteers ● For data analytics purposes including to track whether VentureKids is aligned with its vision and missions

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your information from different sources, including:

From whom?		How?
You	Parents/guardians if student is 18 years or younger	Parents/guardians, students (where applicable) and volunteers submit their Personal Information to us directly through forms available on our Website. These forms are connected to Google Forms and Typeform service providers that help us organize the information that you provide us.

	Directly from the student if the student is over 18 years old	
	Donors	Information you provide directly to us to process your donation.
	Volunteers	From volunteers directly entering their information on our Website and from completing a mentor application form. Through this process you will also be prompted to consent to receiving emails from us, if you wish, for promotional purposes.
Partners		Partners may provide us with Personal Information about volunteers, staff or others for a Program they organize for and with us.
Third party sources		When you provide an online donation to VentureKids using PayPal, we obtain a record of your PayPal username and city location from PayPal.

TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

VentureKids does not sell, rent, lease or license your Personal Information to any party. The protection of your Personal Information is very important to us and we will only share your information as described in this Policy, or by otherwise obtaining your consent.

De-identified information – or, information that does not contain personal identifiers about you – may be shared with our partner organizations (“**Partners**”). In certain cases, Personal Information, such as your name and email address, may be shared with Partners for scholarship purposes.

We may provide information related to students in our Programs to parents/guardians on an ongoing basis.

With the prior consent of students and their parents/guardians, where applicable, we may disclose your Personal Information to third party individuals or entities that are interested in the student’s business idea. We may also use this information in funding applications, investment materials, and opportunities.

We may be compelled to share your information with a court of law or other person or entity with jurisdiction to compel production of such information.

WHERE DO WE STORE YOUR PERSONAL INFORMATION?

We store your Personal Information on Google Drive servers located in California, USA. Service providers we use such as Google Form, Typeform, and Bluehost also maintain information in California, USA.

From time to time, your Personal Information may be transferred to third-party hosts outside of Canada or the United States to help us facilitate and provide certain services on our behalf, for administrative and Website-related services (including, without limitation, maintenance services, database management, web analytics and improvement of the Website's features), or to assist us in analyzing how our Services are being used.

These third parties have access to your Personal Information only to perform these tasks on our behalf. They are contractually bound not to disclose or use it for any other purpose.

By using our Website and engaging in our Services, you consent to the transfer of your Personal Information outside of your jurisdiction for the purpose of storing or processing your Personal Information. You understand that your Personal Information will be subject to local privacy laws that may differ from the privacy laws of the jurisdiction in which you reside.

For additional information about the way in which our service providers treat your Personal Information, contact us at info@venturekids.ca.

HOW DO WE RESPECT CHILDREN'S PRIVACY ONLINE?

Although we do provide programming for children under the age of thirteen (13), our Website is not meant to be used by children under thirteen (13). If you think your child might have provided us with Personal Information without your consent, you may request that the information that we may have about your child be deleted by writing to us at info@venturekids.ca.

HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We retain your Personal Information for only as long as is necessary to fulfill the purposes stated above or otherwise to meet our legal obligations. When determining relevant retention periods, we consider several factors including:

- our rights and obligations with respect to the information involved;
- our legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests (see section on 'What Information do we collect and why do we collect it?' above);
- guidelines issued by relevant data protection authorities; and
- other legal purposes.

Otherwise, when we no longer require your information for the purposes it was collected, we will securely erase your Personal Information.

Prior to deleting your Personal Information, we may retain your data in de-identified form for data analytics purposes, as explained above, unless your identifiable Personal Information is necessary to comply with a legal obligation or to resolve disputes.

HOW DO WE PROTECT YOUR INFORMATION?

Our safeguards

We take appropriate technical, physical and organizational security measures to protect Personal Information in our custody and control against unauthorized access, use, modification and disclosure, destruction and damage. For example, we use industry standard and commercially reasonable security practices such as encryption of our Website through Bluehost.

Although we make reasonable efforts to safeguard your information, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. Any transmission of information by you to VentureKids is at your own risk.

Third-party links

We provide links to third-party websites. These links are provided as a matter of convenience only. As we do not own or control these websites, we have no responsibility or liability for the manner in which these websites or organizations that operate such linked websites may collect, use or disclose, secure and otherwise manage your Personal Information.

By clicking on the third-party links, you are effectively leaving our Website and visiting a third-party site which has its own terms of use and privacy policy. Except as provided in this Policy, we will not give your Personal Information to these third parties without your consent.

HOW DO I DELETE OR CORRECT INFORMATION YOU HAVE ON ME?

You may contact us at info@venturekids.ca to review your Personal Information or to request changes to the Personal Information we have about you. You may also request that we no longer use your information to provide you with Services, delete your Personal Information, or unsubscribe from email updates from VentureKids.

UPDATES TO THIS PRIVACY POLICY

This Policy and other service specific policies may change from time to time in accordance with applicable laws. We will notify you of the changes by posting the amended version on our Website. We may also notify you of the changes by sending you an email or through any other reasonable means.

We encourage you to review this Policy periodically.

HOW DO I REPORT A CONCERN ABOUT MY PERSONAL INFORMATION?

If you have questions or concerns, wish to review or correct your Personal Information that we have collected and retained, or if you wish to provide us with feedback about our Policy, please contact us at info@venturekids.ca.

HOW DO I MAKE A COMPLAINT?

At VentureKids, protecting your Personal Information is very important to us. We strive to have your complete satisfaction in our Services and in addressing your privacy concerns. If we are not able to address your privacy concerns, you may contact the Office of the Privacy Commissioner of Canada:

Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376
Phone: (819) 994-5444
TTY: (819) 994-6591