

# **Focus Imaging Inc. Privacy Policy**

## **Focus Imaging Inc. Commitment to Privacy**

Focus Imaging Inc. is a trusted provider of photographic products and services to communities, schools, and families. Focus Imaging Inc. (“we,” “us,” “Focus Imaging”, “Focus”) are firmly committed to maintaining the accuracy, confidentiality, and security of your personal information in the communities we serve. We recognize the importance of data privacy and use all reasonable security methods to protect the data on our servers. We will collect, access, use and dispose your personal information in accordance with applicable privacy laws and respect your rights under these privacy laws. Focus Imaging Inc. recognizes its obligations and complies with Canada’s Federal *Personal Information Protection and Electronics Documents Act (PIPEDA)* and any Provincial Privacy Legislation with respect to the personal information it collects from any of its customers. When obtaining personal information, directly or indirectly, to provide photographic services to schools and other institutions, Focus Imaging Inc. protects such personal information as required in accordance with the laws that apply to its clients in the Municipal *Freedom of Information and Protection of Privacy Act (MFIPPA)*.

## **Scope Of This Privacy Notice**

The following is the outline of the Focus Imaging Inc. Policy to manage the collection and protection of personal information, its use, disclosure, retention, and destruction in accordance with the provisions and statutory duties and responsibilities under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). It is our policy to be transparent and ensure that our customers are aware of Focus Imaging Inc. Privacy and Security Policy and our compliance with Canada’s Federal *Personal Information Protection and Electronics Documents Act (PIPEDA)* and any Provincial Privacy Legislation with respect to the personal information we collect from our customers.

## **How and Which Customer Information is Collected**

### **Picture Day Information**

Focus Imaging Inc. is immensely proud that School Photo Day is the core of our business. To prepare and facilitate Photo Day to produce all school related image services and customer packages, Focus Imaging Inc. collects certain directory-type information from the school or School Board. This "School Data" that is collected, depends upon the specific services and products Focus Imaging Inc. supplies to that school. We limit collection, to only that, which is necessary for an authorized school purpose. This includes, but is not limited to, School Administrative Services, for example, Student ID Cards, School Yearbook Services, and delivery of purchased Photo Packages. This data ensures a name-image match for each portrait and for efficient distribution within the school.

### **Providing Customer Information**

To register and purchase products online, through our website, customers are requested to provide certain personal information including their name, address, email address, and telephone number. To purchase a product, online on our website, a customer is also requested to provide valid credit card information, including the number, expiration date, CVD/CVC Number, and mailing/shipping address. If a customer orders a gift online and indicates it to be sent directly to the recipient, they can submit the name, and address of the recipient.

**\*Credit card information is not held by Focus Imaging Inc. nor accessible by our company. It is held and secured, solely, through our payment provider; Moneris, Canada's largest financial technology company that specializes in payment processing. \***

## **Access to Customer Information**

**Your information is accessible only to authorized Focus Imaging Inc. employees who need this information to fulfill their job functions. We use and train our team members all necessary information technology infrastructure to ensure and enforce the highest standards of protection and safeguarding in the collection, access, use, retention, and secure disposal of your information.**

## **Use of Customer Information**

Focus Imaging Inc. collects only necessary personal information about you if you specifically provide it to us. This includes, for example, the information you provide when you place an order, schedule an appointment, visit one of our photography studios, contact Customer Service, or register for a service.

The personal information you provide us is only for the purposes for which it was collected, which can also include the following:

- to provide the products, services or benefits you request
- processing and tracking orders
- to respond and communicate with you regarding Customer Service inquiries by email or telephone
- to develop and improve our products and services

The Website automatically collects information using “cookies.” This is a small string of text that is stored on a website user’s computer to permit the website to recognize future visits by that computer. If you disable the option of cookies on your browser, this could affect the functionality of our website and the ability to access certain features.

**Strictly necessary cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our website.

**Functionality cookies.** These cookies are used to recognize you when you return to our websites. This enables us to customize your online experience (for example, by remembering your choices in your cart).

**IP address:** Our System administration may aggregate IP addresses for analysis and to gather general demographic information. A computer's User ID will only be linked to an IP address when customers place an order.

### **Consent to use Personal Information**

By using this website, participating in School Photo Day, or conducting business with Focus Imaging Inc., you consent to our collection, use and disclosure of the personal information you provide to us as described in this Privacy Statement, or as otherwise permitted by law.

In addition, when the school provides us the limited School Data we need to produce and deliver images and other School Service Items, we rely on the participating school to have obtained the appropriate consent to do so. The way in which schools and School Boards collect, use, and share personal information will be set out in the school or School Board's privacy policy.

**If a student has their photo taken, we assume that the appropriate consent has been obtained. If you do not wish to have your child participate in Picture Day, please contact the school to advise them.**

### **Disposal of your Personal Information**

Once your information is no longer needed to fulfill the purpose for which it was collected, it is securely destroyed. This is done by crisscross shredding for hard copies. Electronic personal information is discarded from any of our DVD, USB Keys, PDA devices and Hard Drives and any other electronic device using erasure secure methods to permanently eliminate retrieval.

## **Privacy Protection for Children**

We understand the importance of protecting children. We do not knowingly permit children under the age of 16 to become registered members of our sites, or to buy goods and services on our sites, without proven parental consent. Focus Imaging Inc. does not knowingly collect or solicit personal information about children under 16, except with their parent's express consent.

## **Third Party Sharing of Information**

**Focus Imaging Inc. will not sell, rent, or licence any customer's personal, identifiable information to any third party.**

Focus Imaging Inc. may share limited customer information with Companies that we partner with solely to perform business support functions on our behalf, including secure monetary transaction sites, ie. Moneris, and Information Technology Systems Management. These companies may be involved with limited access to personal information of our customers. We require these companies to use the information only to provide the contracted services. These companies are prohibited from transferring the information to another party except as needed to provide those services. For identifying fraudulent credit card use, we may share this information with the financial institution that issued the credit card or with law enforcement authorities if we determine, or are notified, that the use of the credit card was fraudulent.

## **Accessing Your Personal Information**

In compliance with Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), registered members of our website, customers can review and update their member profile for accuracy, using their Username and password. Customers also have the option of sending an email to our office to request a change to their information. To protect the privacy of our customers, proof of identity is required.

Focus Imaging Inc. takes the security and confidentiality of personal information very seriously. We have implemented physical, technical, and administrative safeguards and comply with the highest security standards designed to ensure that personal information is protected against unauthorized access, disclosure, inappropriate alteration, or misuse. Our security practices are continually monitored and reviewed to make any necessary changes or improvements to protect the confidentiality and privacy of personal information.

## **Privacy Notice**

This Privacy Notice was last modified August 1, 2024. Focus Imaging Inc. will review and update this Privacy Notice from time to time without prior notice. Any changes to our Privacy Notice are effective as of the modification date noted above. Please view our policy periodically to review updates. By continual use of this website, customers agree to accept the changes.

If you have a questions or concerns regarding Focus Imaging Inc. Privacy Policy, please contact us:

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