

Document Category:	Policy Statement
Document Name:	Privacy Policy
Approved By:	Board of Directors
Approved Date:	May 2010 Revised September 2025

1. Policy Statement

Southwestern Ontario Student Transportation Services (“**STS**”) is a not-for-profit corporation that serves as the transportation consortium for the London District Catholic School Board (“**LDCSB**”) and the Thames Valley District School Board (“**TVDSB**”). STS organizes and administers school student transportation on behalf of LDCSB and TVDSB (the “**Services**”). In so doing, it receives and handles personal information related to the Services in accordance with the direction it receives from LDCSB and TVDSB, as well as applicable laws, including the *Municipal Freedom of Information and Protection of Privacy Act*.

STS (“we”, “us”, or “our”) is committed to protecting the personal information of the children and families we serve. This Privacy Notice outlines how we handle and safeguard personal information. In this Privacy Notice, personal information means any information about an identifiable individual, as may be defined or limited under applicable privacy legislation. Personal information excludes anonymous or de-identified data that is not associated with a particular individual.

2. Policy Action Items

WHAT PERSONAL INFORMATION WE COLLECT

The information we need to collect will vary depending on the circumstances but will generally include the types described below:

- We receive student information from LDCSB and TVDSB, such as: student name, birth date, contact information (e.g., home address, telephone, email), school of attendance, grade level, student identification number, life-threatening medical emergency information, and accessibility and safety needs.
- We receive personal information through direct interactions with those we service, such as when you provide it to us by filling in forms, corresponding with us by phone or email, or using our online portal. This includes:
 - child's name, age, school, grade;
 - child's student identification number;



- parent or guardian's name and contact information;
- emergency contact information;
- pickup and drop-off locations;
- information about student conduct (including through video surveillance on school buses, as described below); and
- relevant health or mobility information (where required for safety or accommodation)

HOW WE USE PERSONAL INFORMATION

We will use personal information for the purposes of establishing a relationship with you, providing the Services, communicating with you, operating our business, and otherwise interacting with you. This includes using personal information to:

- register students for school bus transportation;
- communicate with parents/guardians (including through our online portal);
- plan, implement, and optimize bus routes and scheduling;
- respond to emergencies and incidents;
- ensure safety and security;
- comply with legal and regulatory obligations; and
- fulfill other purposes permitted or required by law.

We may anonymize personal information and use it for purposes of planning, delivering and evaluating the Services; risk management; quality improvement; research; training; and reporting. Anonymized information is information that does not identify you or anyone else, and cannot reasonably be used to do so. We use various methods and safeguards to anonymize information, such as removing or encrypting personal identifiers, aggregating data, and applying statistical techniques. We only use anonymized information in accordance with applicable laws, ethical standards, and our policies and procedures.

HOW WE USE VIDEO SURVEILLANCE

There are cameras installed in the school buses that we use to provide the Services. These cameras record both audio and video of the environment inside and outside of the bus whenever the bus ignition is engaged. The collection of personal information through video surveillance is authorized under the *Education Act*, R.S.O. 1990, c. E.2, and the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56, sections 28(2) and 29(1). We use these audio and video recordings to:

- promote and maintain a safe and secure environment for students, staff, and bus drivers;
- aid in the identification of intruders and of persons who endanger the health, wellbeing or safety of school community members;
- protect property and assets;
- deter and assist in the investigation of incidents of misconduct, vandalism, or other safety concerns; and
- support the enforcement of school board policies and applicable laws.

WHO WE SHARE PERSONAL INFORMATION WITH

We will share personal information with our member school boards, LDCSB and TVDSB, as required.

We will share personal information with our employees, contractors, designated agents, or third-party service providers who require it to assist us with providing the Services to you. We work with third parties, including technology providers, school bus transportation companies, and providers of administrative routing services. The third-party service providers that STS works with must have appropriate security measures in place to protect the privacy and personal information of our clients. These third parties are required to enter into confidentiality agreements before being provided access to personal information.

We will disclose personal information to:

- emergency services organizations (if needed for health or safety)
- government entities and funders, as required, including for reporting purposes;
- government partners for research purposes;
- comply with legal and regulatory requirements; or
- fulfill other purposes permitted or required by law.

We may also share anonymized information with government partners for funding and research purposes.

We do not sell or trade personal information.



HOW WE PROTECT PERSONAL INFORMATION

We understand the importance of protecting personal information and are committed to taking all reasonable steps to protect against unauthorized access, use, loss, modification and disclosure. We use a range of safeguards that are consistent with industry practices for the protection of similar information. These safeguards include the following methods of protection:

- Physical measures, such as locked filing cabinets and restricted access to offices and facilities.
- Organizational measures, such as policies and security and privacy training for staff.
- Technological measures, such as the use of passwords, access controls (“need-to-know”), encryption, and intrusion detection software.

While we strive to protect personal information, it is important to note that no computer system or online communication is perfectly secure. As such we cannot guarantee that communications between you and any of our services, or information stored on our servers will be free from unauthorized access. We encourage you to take steps to protect your personal information, such as not sharing your password for our online portal.

RETENTION

We will only retain personal information for as long as it is necessary for the purposes for which it was collected and in accordance with applicable legal obligations. When we no longer need personal information, we securely destroy it or anonymize it in accordance with applicable law.

INDIVIDUAL RIGHTS

Individuals have the right to request access to information in the custody or under the control of LDCSB and TVDSB (which includes the information held by STS), subject to certain exceptions and at a reasonable cost.

We use our online portal to communicate with you about the Services that you receive through us and to provide you with access to your personal information. You can make access and correction requests by contacting your school. They may require personal information from you to verify your identity to process your request. If your request for access or correction is denied, you will be advised of the reasons for doing so .



Southwestern Ontario
Student Transportation Services
www.mybigyellowbus.ca

QUESTIONS, CONCERNS AND REQUESTS

We encourage you to contact us with any questions or concerns you might have about the STS privacy practices, or with requests regarding your rights to access and correction. Please contact the STS Privacy Officer at: privacyofficer@mybigyellowbus.ca.

Or you can direct your questions, concerns or requests to your school board at:

Thames Valley District School Board

1250 Dundas St

London, ON N5W 5P2

Attention: Board Services

Email: privacy@tvdsb.ca

London District Catholic School Board

5200 Wellington Road South

London, ON N6E 3X8

Attention: Privacy/Records Management
Supervisor

You also have the option to contact the Information and Privacy Commissioner of Ontario with questions or concerns:

Information and Privacy Commissioner of Ontario

2 Bloor Street East, Suite 1400

Toronto, ON, M4W 1A8

Phone: 416-326-3333 | Toll-Free: 1-800-387-0073

TTY: 416-325-7539

www.ipc.on.ca

3. Forms

There are no forms associated with this policy.