



Safety in Schools Foundation of Canada's Policy for Compliance with Canada's Anti-Spam Law

As a matter of good business and customer service, Safety in Schools Foundation respects the communications preferences of our users, supporters, and others. We will moreover comply with the applicable requirements of Canada's Anti-Spam Law (CASL) in all such communications, effective July 1, 2014, when the CASL anti-spam provisions enter into force.

Consent to send CEMs

Safety in Schools Foundation sends commercial electronic messages (CEMs), such as emails, where we have express or implied consent from the message recipient, where we have a third-party referral to contact the recipient, or where consent is not required under CASL. Given our relationships with the companies and personnel with whom we communicate, the majority of ComplyWorks communications are CASL-exempt, meaning that consent is not required.

Record-keeping

Safety in Schools Foundation maintains records that are sufficient to demonstrate that we have consent to send a CEM, where such consent is required under CASL.

Form of CEMs and Disclosure

The CEMs we send clearly indicate that Safety in Schools Foundation is the sender, and state the reason for our communication to them. The CEMs meet legally prescribed form and unsubscribe standards where required under CASL.

Withdrawal of Consent

Where the recipient of a Safety in Schools Foundation message is entitled to withdraw consent to receive communications, we give effect to the unsubscribe request within CASL timelines.

Third Parties

Safety in Schools Foundation expressly requires those service providers who may send CEMs on our behalf to comply with CASL.

Related Safety in Schools Foundation Policies

In addition to anti-spam compliance, security and privacy of information are also top priorities of Safety in Schools Foundation. Our Security and Privacy Policies are available at <http://www.safetyinschools.ca/Policies>. The Policies address compliance with the federal *Personal Information and Electronic Documents Act* (PIPEDA - Government of Canada), and the *Alberta Personal Information Protection Act*.

See the following page for further information on Canada's Anti-Spam Law (CASL)

CASL Spam Overview

You can send a commercial electronic message (CEM) if...

CEM is sent:

- within an organization
- between organizations in a relationship, and message concerns activities of Recipient organization
- is an inquiry or application to a person engaged in a business activity, related to that activity, or response to same
- re: legal right/obligation (e.g. contract, court order)
- to limited-access, secure, confidential account to which only account provider sends messages (e.g. bank)
- from Canada and accessed in another (listed) country, and message complies with foreign spam laws
- by charity soliciting donations
- by political party, organization, candidate, soliciting contributions

You have a “family” or “personal” relationship with Recipient

- as defined by regulation

Consent is not required

where CEM solely:

- provides a quote or estimate the Recipient requested
- facilitates, completes or confirms an existing transaction
- provides warranty, product recall or safety info
- provides factual information about product or service
- delivers a product, goods or a service under existing transaction

You have implied consent

Recipient has:

A “business relationship” with you:

- contract, purchase, lease (past 2 years)
- inquiry/application about contract, purchase, lease (past 6 months)
- published email address (e.g. on a company website) OR provided email address to you, AND message is relevant to Recipient’s business role/function

Recipient has:

A “non-business relationship” with you:

- donation/gift (past 2 years)
- volunteering (past 2 years)
- membership in club, association, voluntary organization (past 2 years)

You obtain express consent

yourself:

Setting out clearly and simply:

- purpose (e.g. “to send you promotional offers”)
- Company name
- mailing address AND either phone number, email address or web address

or via a data broker:

- CEMs may also be sent to Recipients who have given express consent to a data broker/ third party to permit “undisclosed person” to send CEMs
- The data broker may authorize the Company to send CEMs to those Recipients

You have a 3rd party referral

One message where:

- Third Party (referral provider) has family, personal, or business relationship with you AND Recipient



You include in the CEM

either in the message itself, or via clear and prominent link to a web page:

- Identify the sender: Company’s name
- Include contact information: mailing address AND either a phone number, email address or web address for the Company
- Include an unsubscribe: via return email or link. Unsubscribes must be effective within 10 business days

What is a CEM

(commercial electronic message)?
An electronic message (text, sound, voice or image) sent to an electronic address, with a purpose of encouraging participation in a commercial activity.

What is an electronic address?

An address used to transmit an electronic message to an email account, IM account, phone account,

or “any similar account”.