



## **BOX OF CRAYONS (BoC) PRIVACY DATA SHEET**

Founded in 2002 and headquartered in Toronto, Canada, Box of Crayons is a learning and development company with over 17 years of experience creating and delivering practical learning experiences that **unleash the power of curiosity to create connected and engaged company cultures.**

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### **BACKGROUND**

Box of Crayons engaged independent data privacy risk management provider TrustArc™ to review and document the privacy practices described in this data sheet. The purpose of this data sheet is to provide Box of Crayons' clients with information needed to assess the impact of our service on their overall privacy posture by detailing how personal information may be captured, processed and stored by and within the service.

Box of Crayons has designated a privacy manager to respond to any questions customers or third parties may have about how we protect personal data. In addition, this privacy data sheet outlines how we hold ourselves accountable for protecting the privacy of any personal data entrusted to us by our customers and team members in part by undertaking the principles of Privacy by Design in the development of our products and services.

### **INFORMATION PROCESSED BY BoC**

Box of Crayons takes data privacy protection seriously. In order for our sites, products and services to function properly, we are committed to complying with Canada's federal privacy law, Personal Information Protection and Electronic Documents Act (PIPEDA), and the EU's and UK's General Data Protection Regulation (GDPR).

In order to perform our services, we collect the following types of personal information to assist Box of Crayons to confirm and authenticate customer identity: names, addresses, email addresses and telephone numbers. We do not collect or retain any credit card information. Note that this Privacy Data Sheet is a supplement to our online privacy statement posted on our website [boxofcrayons.com/privacy-statement/](https://boxofcrayons.com/privacy-statement/).

### **DATA SECURITY**

We are continuously implementing physical, administrative and technical measures to protect against the unauthorized access, loss, misuse and alteration of personal data belonging to our customers, vendors and employees.

Box of Crayons utilizes a number of methods for protecting personal information, including end-to-end encryption of laptops, anti-virus software installation, access control, monitored email accounts and identity management to safeguard the integrity of the information. We further run monthly spam tests internally across the organization to ensure that the employees are well aware of the consequence of spam emails.

## **VENDOR AND PARTNER MANAGEMENT**

We choose our vendors and partners carefully by maintaining quality control and adherence to privacy rules throughout the duration of our relationship. All vendors and partners must demonstrate the ability to protect personal data with appropriate technical and organizational measures to ensure compliance.

We have a Vendor Management Committee that undertakes an elaborate vendor on-boarding process to ensure legal compliance. The committee reviews our vendors' and partners' privacy practices to ensure that any customer data handled by such vendors and partners are protected from unauthorized loss at all times.

## **LIMITING DATA RETENTION**

We recognize that personal data is not ours to keep forever. Box of Crayons' Records Retention Policy (available on request) ensures that we retain personal data only as long as it is necessary to fulfill the purposes for which it was collected unless a longer retention period is required under applicable law.

## **EMPLOYEE PRIVACY TRAINING AND AWARENESS**

At Box of Crayons, we believe that **privacy is everyone's responsibility**. All employees who handle personal data have a role to play in keeping it secure. Our annual privacy awareness training reinforces this principle early and often, embedding it into all aspects of our training. To reinforce this training, employees are regularly provided with information and resources through monthly privacy newsletters, reminding them that protecting personal information is part of their job descriptions.

For additional information regarding our privacy practices, please contact our privacy manager at [privacy@boxofcrayons.com](mailto:privacy@boxofcrayons.com).

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## **ABOUT THIS DATA SHEET**

*The information contained herein is based upon document reviews and interviews with relevant subject matter experts involved in the development and operation of the services provided by BoC. The discovery process relied upon the good faith accuracy of the information provided; TrustArc has not undertaken an independent audit and does not certify the information contained in this data sheet. However, the information contained herein was believed to be accurate and complete as of the time this data sheet was first published. Please note that the information provided with this paper, concerning technical or professional subject matters, is for general awareness only, may be subject to change and does not constitute legal or professional advice, nor warranty of fitness for a particular purpose or compliance with applicable laws.*