



6.C-2008 External Relations Privacy

1. Purpose

To ensure records of external stakeholders are held and maintained in a manner that respects the privacy of the information, is confidential and complies with Alberta's *Personal Information Protection Act*.

2. Policy

St. Mary's University (University) strives to protect the privacy of external stakeholders and maintain the confidentiality of their information. The University accepts the responsibility of keeping all records pertaining to external stakeholders out of the hands of those who would use the information for illegitimate purposes. External stakeholders (hereafter referred to as "supporters) include alumni, donors and prospective donors, volunteers, and affiliated agencies, organizations, and corporations.

This policy outlines the principles and practices followed in protecting the personal information of external stakeholders. This policy applies to the institution of St. Mary's University as well as any person or organization providing services on the University's behalf. A copy of this policy is provided to any individual on request.

2.1 Information Steward

The custody of these records is vested in the External Relations department. The External Relations department has the responsibility and authority to grant or deny access to supports' records, consistent with this policy. It should be stressed that the entitlements to access certain records does NOT include authority to release information from the record except as provided for in this policy. All matters pertaining to the interpretation of the policy should be referred to the Vice-President External Relations and/or the Privacy office of Human Resources.

Approval Authority	Responsible Office	Effective Date	Date Last Revisited	Review Frequency
Board of Governors	External Relations	No Date	No Date	Every 5 years

3. Definitions

- 3.1 Personal information – information about an identifiable individual, for example: name, address, telephone numbers, e-mail address.
- 3.2 Records – All recorded information, regardless of its physical form or characteristics, created or received pursuant to the transaction of University business or the fulfillment of its educational, administrative, business, or legal obligations.
- 3.3 Disclosure – release of information to a third party.
- 3.4 Minimum Retention – The minimum amount of time a particular series of records should be retained.

4. Collection of Information

The University normally collects information directly from supporters and this information includes:

- Basic personal information such as name, address, birth date, etc.
- Relationship information such as family members, employer, etc.
- Interests and activities information
- Financial information required to process and receipt donations
- Present and past history of giving to the University
- Present and past history of volunteering and committee service with the University
- Any and other interactions an individual may have had with the University

This is not intended to be an exhaustive list, and the University may collect other information about supports from time to time, as determined appropriate by the Vice-President External Relations.

Upon graduation or upon transfer after completing 30 credits, students' basic personal information and enrolment information such as dates of attendance, academic program, graduation date, etc. are forwarded to the External Relations department by the Registrar for the purpose of recognizing them as an alumni.

Additionally, publicly available information may be collected and stored, for the purpose of determining supporters' motivation and interest in giving to the University and for the purpose of updating alumni records as well as to recognize outstanding achievement or distinguished service by alumni.

Supporter decisions to withhold particular details or information may limit the services and programs provided by the University.

5. Use of Information

The personal information collected from supports by the University is used for the purpose of assisting the University in:

- Distinguishing supporters from each other
- Documenting career and personal successes of alumni
- Recognizing volunteer service with or support of the University
- Determining the nature and extent of a donor's motivation and interest in giving a gift
- Assisting supporters in making gifts
- Appropriately receipting, acknowledging, and stewarding the gifts of donors
- Ensuring University communications materials reach supporters
- Keeping supporters informed about University activities, programs and services

Typically, the University will inform supporters of the intended use of personal information and seek consent at the time of collection. The only time notification is not provided is when an individual volunteers information for an obvious purpose (for example, producing a credit card when the information will only be used to process a donation).

In certain circumstances, the University may wish to use the personal information previously collected for a new purpose. In these situations, the University will notify supporters by email or mail and give them the opportunity to opt-out of such new use.

At any time, supporters have the right to request that their personal information cease to be used for communications activities, fundraising purposes and/or alumni programs and services. Although the information will no longer be used, it will be retained by the University according to established retention guidelines. Supporters who wish to stop the use of their information for a particular purpose should contact the Vice-President External Relations.

6. Access to and Disclosure of information

Information collected by the University will only be accessed and used by authorized staff to fulfill the purpose for which it was originally collected or for a use consistent with that purpose unless expressly consented otherwise.

The University may provide volunteers restricted access to limited personal information of supporters as part of their volunteer roles in promoting and working with the University. All volunteers will be required to sign confidentiality agreements concerning their access to this information.

The University may share personal information with third party vendors engaged to assist in carrying out one or more of the uses described above. An example of this type of access includes a company that provides mailing services and is provided with the names and addresses of supporters to complete this activity. These vendors are prohibited from using supporters' personal information for any purpose other than to provide the contracted service and are required to protect the personal information received from the University.

Supporters may access the personal information the University has recorded for them but shall be limited to their own personal information. Supporters may also provide written permission to the University to permit another individual to review the personal information recorded for that supporter, but only for that supporter. Requests for access should be directed to the External Relations department.

Legal requirements may necessitate the disclosure of supporters' personal information to government or law enforcement agencies. The type of information the University is legally required to disclose may relate to criminal investigations or tax reporting requirements. Only the information specifically requested is disclosed and the University takes precautions to satisfy that the authority making the request has legitimate grounds to do so.

The University does not rent, trade or sell its supporters' personal information.

Aggregate information on supporters may be shared publicly.

6.1 Access to *Razor's Edge*

The External Relations department has the authority to grant or deny access to the database containing supporters' personal information (*Razor's Edge*). Individuals who wish to access the system must commit to adhering to this policy and operational guidelines for system workstations. All system users are required to sign a declaration, certifying that they have read, understood, and agreed to abide by the *External Relations Privacy Policy*. Any violations of the policy and guidelines will result in denial of access to the system and potentially termination.

7. Information Accuracy & Security

The University makes every reasonable effort to ensure that supporters' information is accurate and complete. If there is a change to personal information that may affect their relationship with the institution, supporters should contact the External Relations department. If there is an error or omission in their record, supporters may request in writing that the information be corrected.

The University protects supporters' information in a manner appropriate for the sensitivity of the information. The University makes every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

8. Retention of Supporter Records

The University retains supporters' personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. As the University business includes the stewardship of endowment funds kept in perpetuity, all information collected from a donor may be retained permanently. In addition, biographical records of alumni are retained permanently.

Approval Authority	Responsible Office	Effective Date	Date Last Revisited
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