



6.A-2008 Institutional Privacy Policy

1. Purpose

- 1.1 To ensure compliance with the privacy rules in Alberta's *Personal Information Protection Act*.
- 1.2 To provide a framework for the development and implementation of all St. Mary's University (University) policies and procedures relating to privacy and information management.

2. Policy

The University recognizes that illegitimate access to personal information can harm the reputation, financial status and/or physical well-being of an individual. With that in mind, the University accepts the responsibility of protecting the personal information of staff, faculty, students and external stakeholders in its custody and control.

The University manages all personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices followed in protecting personal information. This policy applies to the institution of St. Mary's University as well as any person or organization providing services on its behalf. A copy of this policy is provided to any individual on request.

2.1 Personal Information

Personal information means information about an identifiable individual. This includes information that can identify an individual (e.g. name, home address, home phone number, ID number, image), and information about an individual (e.g. physical description, financial information, educational qualifications, blood type, evaluations).

2.2 Collection of Information

The University collects only the information needed to maintain an established

| Approval Authority | Responsible Office | Effective Date | Date Last Revisited | Review Frequency |
|--------------------|--------------------|----------------|---------------------|------------------|
| Board of Governors | Human Resources | No Date | No Date | Every 5 years |

relationship with an individual (e.g. manage an account, deliver services, provide information). Individuals are informed, before or at the time of collecting personal information, of the purposes for which the information is collected.

The only time this notification is not provided is when an individual volunteers information for an obvious purpose (e.g. producing a credit card when the information will be used to process a payment or providing name and phone number information for a contest when the information will be used to contact the winner).

Personal information is generally collected directly from the individual. Personal information may be collected from a third-party with consent of the individual(s) in question or as authorized by law.

2.3 Obtaining Consent

The University asks for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. The University may assume consent where information is volunteered for an obvious purpose.

In cases where personal information was collected before January 1, 2004, the University assumes consent to its use for the purpose for which the information was collected.

The University asks for express consent for some purposes and may not be able to provide certain services if consent is not provided. Where express consent is needed, it will normally be asked for in writing (by signing a consent form, by checking on a form) or electronically (via secure log in).

In cases that do not involve sensitive personal information, the University may rely on "opt-out" consent. For example, alumni contact information would automatically be added to the newsletter subscriber list unless opted-out on the registration form or convocation response card.

Individuals may withdraw consent to the use of personal information at any time, unless the personal information is necessary to fulfill University legal obligations. Although the information will no longer be used, it will be retained by the University according to established retention guidelines.

The University may collect, use or disclose personal information without consent when authorized by law. For example, the University may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceedings, in an emergency that threatens life, health or safety or when the personal information is from a public telephone directory.

2.4 Use & Disclosure of Information

The University uses and discloses personal information only for the purposes for which it was collected except as authorized by law. If the University wishes to use personal information for any new purpose, consent will be requested.

Further details about the use and disclosure of personal information in the custody and control of St. Mary's University are available in the *Student Records Privacy Policy* (Policy # 6.B – 2008), the *Human Resources Privacy Policy* (Policy # 6.C – 2008) and the *External Relations Privacy Policy* (Policy # 6.D – 2008).

2.5 Information Accuracy & Security

The University makes every reasonable effort to ensure that personal information in its custody is accurate and complete. The University relies on its stakeholders to notify the institution if there is a change to their personal information that may affect their relationship with the institution. If individuals are aware of an error in the information the University holds about them, they should inform the institution and it will be corrected wherever possible. In some cases, a written request for correction may be required.

The University protects personal information in a manner appropriate to 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.

The University uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

The University retains personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

2.6 Access to Information

Stakeholders of the University have the right to access their own personal information that is in the custody or control of the University, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse access to information that would reveal personal information about another individual. Organizations are also authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Finally, access may be refused if the information is privileged or contained in mediation records.

If a request is refused in whole or in part, the University will provide the reasons for the refusal. In some cases where exceptions to access apply, the University may withhold that information and provide the remainder of the record.

Individuals may make a request for access to their personal information by writing to the AVP Human Resources. Sufficient information must be provided in the request to allow information being sought to be identified.

Individuals may also request information about University use of their personal information and any disclosure of that information to persons outside the institution. For personal information collected before January 2004, if the University does not have a record of disclosures, information about any disclosure of the information that is likely to have occurred will be provided.

Individuals may also request a correction of an error or omission of their personal information.

The University will respond to a request within 45 calendar days unless an extension is granted. The University may charge a reasonable fee to provide access to

information, but not to make a correction. The University will advise individuals of any fees that may apply before beginning to process a request.

2.7 Questions & Complaints

Questions or concerns about any collection, use or disclosure of personal information by the University, or about a request for access to personal information can be directed to the Human Resources officer designated to ensure compliance with PIPA:

AVP Human Resources
St. Mary's University
Phone: (403) 531-9130
Email: privacy@stmu.ab.ca

If a satisfactory response is not provided, the Information and Privacy Commissioner of Alberta can be contacted:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 6 Avenue SW
Calgary, Alberta T2P 3W2
Phone: (403) 297-2728 Toll free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca Web site: www.oipc.ab.ca