

PRIVACY POLICY

Approved April 2, 2012

Revised by VP Finance July 8, 2015

Updated by Director HR October 14, 2022

1. PREAMBLE

Briercrest College and Seminary (BCS) is committed to respecting and protecting the privacy of our employees, board members, students, alumni, donors, customers, volunteers, and visitors to our web site. This policy applies to each of the three schools operated by BCS – Briercrest Christian Academy, Briercrest College and Briercrest Seminary.

2. PROTECTION OF PERSONAL PRIVACY

We limit the collection, use, disclosure, and retention of personal information to purposes appropriate to fulfilling our mission.

Individuals provide consent for the collection, use and disclosure of their personal information. For students who enrol in Briercrest Christian Academy, Briercrest College and Briercrest Seminary, consent is implied that their personal information will be appropriately collected and used, and that any disclosure of their information will be limited to staff and faculty involved directly in supporting the success of the student in the student's academics and student life. Contact information collected by BCS will also be used for communication to students and to individuals indicating support for Briercrest College and Seminary.

Written consent is required for release of confidential and sensitive information beyond BCS or beyond the stated intended use of the information. At all times, we reserve the right to disclose information where required or allowed by law.

We make reasonable efforts to have in place appropriate physical, electronic, and procedural safeguards to prevent unauthorized access, maintain data security, and correctly use the information we collect.

We NEVER sell, rent, loan, or give any mailing lists to anyone outside of our organization. Personal information including credit checks by financial institutions will not be disclosed to third parties without the express consent of the individual.

3. PURPOSE

Employees, at one time or another, may receive personal, privileged and/or confidential information which may concern other individuals or organizations. The purpose of this Statement of Policy and Procedures is to preserve the privacy of individuals and organizations whose information is available to and stored by BCS, by outlining employee obligations and procedures for dealing with personal, privileged and/or confidential information.

4. PRIVACY POLICY

At BCS we are committed to abiding by the following ten principles of the Personal Information Protection and Electronic Documents Act (PIPEDA):

1. **Accountability:** BCS is responsible for personal information under its control. The Privacy Manager is responsible for monitoring our ongoing compliance with Privacy Principles.
2. **Identifying Purposes:** The purpose for which information is collected will be identified by BCS.
3. **Consent:** Consent is required for the collection, use and disclosure of personal information subject to certain exceptions. Such exceptions are set out in the law and include where legal, medical or security reasons make it impossible or impractical to seek consent. Consent may be expressed in writing, given verbally, electronically or through our authorized representatives. In certain circumstances it may also be implied. BCS collects and uses personal information for purposes that could include:
 - a. Assess applicants for acceptance and process tuition payment information
 - b. Registration of applicants
 - c. Contact with students, employees, alumni, and donors when required
 - d. Graduation activities for graduating students and their families
 - e. Preparation of the student, staff, and faculty directories
 - f. Event notification to alumni and donors
 - g. Facilitation of holistic care, physical or mental health of the individual
4. **Limiting Collection:** The collection of personal information must be by fair and lawful means and be limited to that which is necessary for the purposes identified.
5. **Limiting Use, Disclosure and Retention:** Personal information may only be used or disclosed for the purposes for which it was collected, other purposes consented to or as required or permitted by law. It may only be kept for as long as is necessary to satisfy the purposes for which it was collected or as required or permitted by law.

6. Accuracy: BCS will make every effort to ensure that the personal information it collects, and uses is as accurate, complete, and current as required for the purpose for which the information was collected.
7. Safeguards: BCS is committed to safeguarding personal information in electronic or hard copy form in order to prevent it from unwarranted intrusion, release, or misuse.
8. Openness: Information about BCS' privacy policies and practices for managing personal information shall be made available to those who request it.
9. Individual Access: Upon written request, an individual will be informed of the existence, use and disclosure of their information and will be given access to it, subject to certain exceptions, as permitted by law. The individual may also verify the accuracy and completeness of their information and request that it be amended, if appropriate.
10. Inquiries and Concerns: BCS may be contacted regarding inquiries or concerns about privacy policies and practices.

5. SCOPE

This Statement of Policy and Procedure applies to all employees, students, donors, volunteers, alumni, and board members of Briercrest College and Seminary or anyone else granted access to personal, privileged and/or confidential information. *All employees and contractors who have access to personal and/or confidential information collected, stored and/or used by BCS are required to sign the attached Confidentiality Agreement to maintain the privacy of that information.*

6. RESPONSIBILITIES OF PRIVACY MANAGER

1. Internal compliance with applicable policies or legislation
2. Cooperating with supervisors, human resources and/or payroll personnel in developing internal policies for the collection, use and disclosure of personal information and personal health information of employees and customers
3. Monitoring and responding to Third Party requests for personal information or personal health information
4. Ensuring appropriate consent is obtained for the collection, use and disclosure of personal information and personal health information
5. Where collection, use or disclosure occurs without prior consent, notifying individuals of the collection, use and disclosure of personal information and/or personal health information after such occurrence.

6. DEFINITIONS

“**Personal health information**” is information about an identifiable individual that relates to the physical or mental health of the individual, the provision of health care to the individual, the individual’s entitlement to payment for health care, the individual’s health card number, the identity of providers of health care to the individual or the identity of substitute decision-makers on behalf of the individual.

“**Personal information**” is any information about an identifiable individual and includes race, ethnic origin, color, age, marital status, family status, religion, education, medical history, criminal record, employment history, financial status, address, telephone number, email addresses, and any numerical identification, such as Social Insurance Number. Personal information also includes information that may relate to the work performance of the individual, any allegations, investigations or findings of wrongdoing, misconduct, or discipline. Personal information does not include job title, business contact information or job description.

“**Third parties**” are individuals or organizations other than the subject of the records or representatives of Briercrest College and Seminary. Note that in certain circumstances, Briercrest College and Seminary may be entitled to provide personal information to an external party acting as an agent of Briercrest College and Seminary.

APPENDIX A

Related Forms/Policies	
Where is this policy published	https://www.briercrest.ca/hr/documents/ https://briercrestcol.sharepoint.com/hr/SitePages/Home.aspx
Contact Information	Director of Human Resources (humanresources@briercrest.ca)
Source Documents	https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/

CONFIDENTIALITY AGREEMENT

During the course of my employment/contract with Briercrest College and Seminary, I may have access to, or acquire, sensitive, confidential client, supplier, and/or employee information, and/or proprietary information confidential to the organization (for example, this information could pertain to finances or personal business activities and/or plans). I agree that I must maintain the confidentiality of this information and exercise discretion, while in the employ/contract of the organization, in any disclosure of such confidential information.

After leaving the organization, whether voluntary or involuntary, all such client, company or employee information must remain confidential. I may not use any such information for furthering a private enterprise or as a means of making personal gain. Any violation of this Agreement may result in disciplinary action, up to and including dismissal, and/or subsequent civil or criminal legal action, especially in the case of an ex-employee.

I understand and agree to this Agreement.

Name of Employee

Name for Organization

Signature of Employee

Signature for Organization

Date

Date