

# Great Plains College

## PRIVACY POLICY

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**NAME:** PRIVACY POLICY

### PHILOSOPHY

The privacy and security of personal information is very important to Great Plains College and the College is committed to the appropriate use, handling, retention and disposal of the personal information in its possession and control including, for example, the personal information of its employees and prospective, current and past students.

### PURPOSE

This policy explains the College's privacy and security practices with respect to all personal information in the possession and control of the College, and may be supplemented by specific policies, procedures, and practices.

Great Plains College is a "Local Authority" pursuant to The Local Authority Freedom of Information and Protection of Privacy Act ("LAFOIP" or the "Act"). As such, it is responsible to protect the personal information it acquires in the course of its business operations, to provide appropriate access to records in its possession and control, and to ensure that not only its own staff but also third party contractors it works with comply with this policy, LAFOIP, and any other relevant privacy legislation.

### DEFINITIONS

Personal Information in the context of the college environment will include information about an identifiable individual that is recorded in any form as defined in Part IV, Section 23 of LAFOIP. Typically this will include but not be limited to items such as:

- Name and mailing information
- Social Insurance Number
- Citizenship status and/or Place of Origin
- Gender
- Marital and/or Family Status
- Birth date
- Health Services Number
- Personal health information
- Disability
- Age
- Information disclosed by an individual in order to identify with an equity group
- Emergency Contact Information
- E-mail address and account information
- Employment history information
- Education history information (including attendance in current programs)
- Criminal history information
- Financial information
- Views and opinions of another individual with respect to the individual
- Information gathered for the purpose of collecting a tax

### ROLES

The College shall appoint a Privacy Officer whose responsibilities include:

- a) Responsibility for implementation and interpretation of this policy.

- b) Ensuring, in conjunction with Human Resources, that appropriate orientation and education on Privacy policy and processes is provided to staff.
- c) Receiving requests to access College records directly or upon referral from other staff.
- d) Overseeing practices to ensure consistency with this policy and the Act.
- e) Investigating and responding to any unauthorized use or disclosure of personal information.

The Privacy Officer will make a decision concerning an access request and communicate the College's decision in writing to the person making the request.

## PROTECTION OF PERSONAL INFORMATION

**Purpose** – Great Plains College will identify the purposes for which personal information is being collected at or before the time the information is collected.

**Collection** – Great Plains collects personal information for the following purposes:

- To administer, plan, and manage the relationship with individuals and to communicate with individuals;
- To provide individuals with requested information and/or services;
- To better understand how the College may improve its services, to develop and conduct its business operations, and for other internal business purposes;
- To obtain feedback through student follow-up surveys administered by a third party consultant;
- To provide individuals with information on current and future services or other developments with respect to the College and its affiliates and partners (in accordance with Canada's Anti-Spam Legislation – see below); and
- To comply with applicable legal and regulatory requirements or to protect the College's legal rights and property;

(collectively, the "**Authorized Purposes**").

The College does not collect personal information for any other purposes, unless it has the consent of the individual to whom it relates or where it has a legal duty or right to do so.

**Consent** – Great Plains College will only collect personal information with consent of the individual to whom it relates or where otherwise authorized by law; in some cases this consent will be reasonably implied. Generally, this means that the College collects information directly from individuals (e.g. in person, over the phone, through its website), but the College may collect information from other sources with an individual's consent or where authorized by law. Individuals provide their consent to the collection, use and disclosure of personal information by the College when they provide their information to the College or use its services. Individuals can deny or withdraw their consent to the College's collection, use and disclosure of personal information at any time upon reasonable notice, subject to any legal or contractual requirements. However, if consent is denied or withdrawn, the College may not be able to provide certain services.

**Access and Correction** - Subject to the Act, individuals are entitled to access their own personal information upon a written request and to request correction of the personal information where the individual believes there is an error or omission. Please see the Access Guidelines below for further information.

**Use and Disclosure** – The College only uses or discloses personal information as reasonably required to facilitate the Authorized Purposes listed above. The College does not otherwise use or disclose personal information unless the College has an individual's consent, the College has a good faith belief that disclosure of the information is necessary to protect the rights or property of the College, or the College has a legal duty or right to do so.

For example, Great Plains College may release information where a case of authorized, justified or legally required

release is established. These may include:

- Release of personal information in response to a Court Order or formal legal or public investigation
- Release information to appropriate emergency contacts in the event of an emergency or a safety or security threat to any individual
- Release of select information to government departments for the purposes of statistical analysis and research, ensuring that the information's confidentiality is protected to the fullest extent possible
- Release in other situations that are specifically permitted by LAFOIP.
- Release to a limited number of third party service providers who provide services related to the delivery of Great Plains College programs and services
- Release in order to collect a debt owing to Great Plains College.

The College may use personal information to inform individuals of current and/or new services or other developments that the College believes will be of interest to individuals in accordance with Canada's Anti-Spam Legislation. Such communications may be made by way of telephone, text message, direct messaging, e-mail, fax or regular mail. Individuals provide their consent to the College contacting them in this manner when they use the College's services. Individuals may opt-out of receiving such communications by returning the communication to the College with "PLEASE REMOVE" expressly stated on the communication. Refer to the College's Anti-Spam Compliance Policy and Procedures for more information.

**Storage and Processing** – The College will store the personal information on its internal servers and/or with its services providers. The College's service providers may store and/or process personal information outside of Canada (including in the United States of America). When information is stored or processed outside of Canada, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions. The College has taken appropriate technical, organizational, and legal steps to secure this information.

**Retention** - Great Plains College will retain personal information as long as needed to fulfill the purpose for which it was collected and for as long as required to comply with the most current Administrative Records Management System issued by the Saskatchewan Archives Board. Refer to the Great Plains College Document Retention and Disposal Policy for more information.

**Protection** – The College has in place reasonable policies, procedures and safeguards (including physical, technological and organizational measures) designed to protect the security of personal information in its possession or under its control. The protection of personal information is of paramount concern to the College, and the College is prepared to take appropriate and timely steps in the event of any incidents involving personal information in accordance with applicable privacy laws.

## **ACCESS GUIDELINES**

The personal information of prospective, current and past students and employees will be protected and access limited, where within the control of the College, to Great Plains College staff requiring the information as part of provision of normal services, to a limited set of third parties who work with the College to provide services and programs, and to those who make proper access requests and are entitled to the information per the Act.

Subject to the Act, individuals are entitled to access their own personal information upon a written request and to request correction of the personal information where the individual believes there is an error or omission. The College relies on individuals to notify the College if there is any change to their personal information that may affect their relationship with the College.

Upon written request, students may request that copies of their student record be forwarded to themselves or to an identified third party. Where the record kept by Great Plains College is not the student's official record (ie: transcript information housed at brokering institutions), students will be advised to contact the brokering institution for an official record.

Third party access request may be granted in appropriate cases. The affected student or employee will be advised if his/her information has been requested and cannot be “de-identified” to comply with the request to give him/her an opportunity to object. Access to information may be declined or granted on a restricted basis if Great Plains College determines that any provision contained within the Act is applicable. Great Plains College will advise the applicant of its decision to withhold some or all of the requested information and the applicant may seek a review of Great Plains College’s decision first with the Manager of HR, CEO and lastly via the Saskatchewan Information and Privacy Commissioner. Access and correction requests can be filed following the process outlined in the Great Plains College Access/Correction Request Process.

## **GDPR INFORMATION FOR EUROPEAN RESIDENTS**

The European General Data Protection Regulation (GDPR) sets out obligations and rights with respect to the personal data of residents of the European Union. Great Plains College is committed to ensuring that it complies with the requirements of the GDPR. As such, this section outlines additional information relevant to residents of the European Union only.

In order to comply with the requirements of the GDPR for European users, this policy outlines the legal basis on which we process personal data (also referred to as personal information herein) and provides other information required by the GDPR. We process personal data when we have a lawful basis to do so in accordance with the GDPR. Generally, this means that we process personal data only where we have consent, where necessary to provide individuals with information or services, or where necessary to comply with our legal obligations. We may also process personal data where otherwise allowed by the GDPR for the purposes outlined in this policy (for example, to communicate with individuals and to respond to requests). Please see the remainder of this policy for more information on our privacy practices.

**Rights relating to Personal Data** – Subject to some exceptions, the GDPR provides European Union residents with the following rights:

- a. **Right of access:** Individuals have the right to information about whether and why we process personal data and related information (for example, what personal data we are processing).
- b. **Right of rectification:** Individuals have the right to correct any inaccurate or incomplete personal data that we hold about them.
- c. **Right to erasure:** Individuals have the right to ask us to delete personal data that we hold about them.
- d. **Right to restrict or object to processing:** Individuals have the right to ask us to limit or stop our processing of personal data in certain cases (for example, if the personal data we are processing is inaccurate or is for direct marketing purposes).
- e. **Right to data portability:** Individuals have the right to ask us for a copy of personal data we hold about them and to transfer such data to another entity.
- f. **Right to complain:** We encourage individuals to contact us at the contact information below if they have any questions or concerns with our personal data practices. However, individuals also have the right to complain to regulatory authorities in their jurisdiction. Please contact us at the contact information below for information about the appropriate authority.

Individuals may exercise these rights or find out more about these rights by contacting Great Plains College at the contact information listed below.

**Retention and Storage of Personal Data** – Great Plains College is based in Canada and processes personal data in Canada. The European Commission recognizes Canada as providing an adequate level of protection for personal data. Great Plains College’s service providers may process personal information outside of Canada (such as in the United States of America). When information is processed outside of the European Union, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions. Great Plains College has taken appropriate technical, organizational, and legal steps to secure this information.

## **WEBSITE INFORMATION**

Visitors to the College's website should also be aware that anonymous technical information may be collected by the College as a result of a visit to the College's website. For example, this information may include the visitor's IP address, browser type, operating system, domain name, access times and referring website addresses. The College uses this anonymous technical information for purposes such as diagnosing problems with the College's servers, improving the operation and content of the College's website and compiling aggregate and statistical information.

The College will not attempt to link or match such anonymous technical information with any personally-identifiable information unless the College has an individual's consent, the College (or its service providers) have detected or reasonably suspect any unlawful use of the College's services or a security breach, or the College has a legal duty or right to do so.

The College may use "cookies" on its website. "Cookies" are small text files placed on computers that can collect and store a variety of information. Permanent cookies are stored indefinitely on a user's hard drive unless manually deleted, while temporary cookies are automatically deleted from the user's browser upon logging out of a website. Web browsers typically allow users to disable permanent and/or temporary cookies. Please note that the College uses Google Analytics. There is more information about how Google collects, uses, and processes data here: <http://www.google.com/policies/privacy/partners/>.

## **EFFECTIVE DATE AND CHANGES**

This policy is effective as of the date approved by the Board of Governors. The College reserves the right to change this policy at any time in accordance with applicable laws – please check our website for updates to this policy.

## **REFERENCES**

- The Local Authority Freedom of Information and Protection of Privacy Act (LAFOIP)
- European General Data Protection Regulation (GDPR)
- Confidentiality Agreement
- Code of Ethics for Employees Policy
- Document Retention and Disposal Policy
- Information Security and Information Technology Acceptable Usage Policy
- Internet and E-mail Usage Policy
- Privacy Guidelines
- Access/Correction Request Process and Form
- Consent to Disclose Personal Information Form
- Anti-Spam Compliance Policy
- Anti-Spam Compliance Procedures

## **CONTACT**

For further information about the College's privacy practices, to make a request for access to personal information, to exercise any other rights outlined above, please contact the Great Plains College's Privacy Officer at:

E: [privacyofficer@greatplainscollege.ca](mailto:privacyofficer@greatplainscollege.ca)  
P: 306-773-1531

## **ADDITIONAL RESOURCES**

Office of the Saskatchewan Information and Privacy Commissioner  
Regina, SK S4P 4B4  
1-877-748-2298 Toll free or 1-306-787-8350  
E: [webmaster@oipc.sk.ca](mailto:webmaster@oipc.sk.ca)  
W: <http://oipc.sk.ca/>