



PROTECTION OF PRIVACY POLICY

Authorizer: Vice President, Finance and Corporate Services

Version: V1

Effective Date: January 6, 2022

POLICY STATEMENT:

Conestoga College Institute of Technology and Advanced Learning (Conestoga) is committed to ensuring that all personal information collected, used, disclosed, stored and discarded is done so in accordance with Ontario's Freedom of Information and Protection of Privacy Act (FIPPA) and all other applicable legislation in order to protect the privacy of individuals.

POLICY ELABORATION:

This policy adheres to the following protection of privacy principles:

- **Accountability** - Conestoga is responsible for the personal information under its custody and control.
 - Conestoga publishes its policies and practices related to the management of personal information through the corporate website.
- **Accuracy** - Conestoga takes reasonable steps to ensure personal information is as accurate, complete, and up-to-date as is necessary for the purposes for which it was collected.
 - An individual may challenge the accuracy and completeness of their information and have it amended as appropriate.
- **Consent** – Conestoga provides individuals the opportunity to provide informed consent for the collection, use, and disclosure of personal information except when pre-empted by law.
- **Identifying purposes** – Conestoga explicitly identifies the purpose for the collection of personal information at or before the time information is collected.
- **Access** - Upon request and except when pre-empted by law, an individual must be informed of the existence, use, and disclosure of their personal information and shall be given access to that information.

- Collection – Conestoga only collects personal information required for its business purposes when collection is authorized by law.
 - Conestoga collects personal information directly from an individual unless there is a reasonable requirement from another source permitted under FIPPA.
- Use and disclosure - Personal information is not used or disclosed for purposes other than those for which it was collected, except with the informed consent of the individual or as required by law.
- Retention – Conestoga disposes of personal information according to approved records retention schedules.
- Safeguards – Conestoga ensures the appropriate security protections that correspond to the sensitivity of the information in its custody and control.

SCOPE:

This policy pertains to all personal information in Conestoga’s custody and control, excluding personal health information that is governed by the *Personal Health Information Protection Act*. Personal information in the custody and control of Conestoga for the purpose of scholarly research is outside of the scope of this procedure.

DEFINITIONS:

Disposition

Destruction and or transfer to an archival facility

FIPPA

Freedom of Information and Protection of Privacy Act (FIPPA)

Personal information -

Personal information means recorded information about an identifiable individual as defined in FIPPA. Information related to a person acting in their business capacity is not personal information. This includes business addresses, work titles, business phone numbers, and Conestoga issued email addresses.

REFERENCES:

Freedom of Information and Protection of Privacy Act (FIPPA)

Ministry of Training, Colleges and Universities Act

Ontario Colleges of Applied Arts and Technology Act

Personal Health Information Protection Act

REVISION LOG:

December 15, 2021 Academic Forum

January 6, 2022 Academic Coordinating Committee