

# Canadian Southern Baptist Seminary & College Privacy Policy

March 2018

## **INTRODUCTION**

Canadian Southern Baptist Seminary & College (CSBS&C) respects the privacy of the personal information of its employees, students, donors, alumni, volunteers and other stakeholders. CSBS&C is committed to protecting the privacy of personal information entrusted to us. In line with that commitment, we seek to be transparent and accountable with respect to the collection, use, disclosure and security of personal information. CSBS&C falls under the Personal Information Protection Act (PIPA).

This policy sets out the principles that CSBS&C applies with respect to the collection, use, disclosure, and protection of personal information.

## **SCOPE**

This policy applies to personal information of CSBS&C's students, alumni, staff, donors, volunteers, customers and other stakeholders such as applicants for admission as students and library patrons.

## **DEFINITIONS**

“Alumni” – individuals who have attended CSBS&C and who have completed a formal program, either a Diploma, Certificate, or Degree. For the purpose of this policy, alumni also includes former students, who have attended CSBS&C for a minimum of one course (e.g., one-week intensives).

“Collection” - the act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

“Consent” – voluntary agreement with the collection, use or disclosure of the personal information for the specified purposes. Consent may be expressed or implied. Express consent may be given electronically or in writing. Implied consent is consent that may be reasonably inferred based on an individual's action or inaction.

“Customer” – Any individual or organization that has participated or expressed interest in a commercial or promotional relationship with CSBS&C. This includes individuals who rent our facilities and individuals who use services provided by Blackaby Ministries International Canada and

“Disclosure” – the act of making personal information available to third parties.

“Donor” – individual who has donated money, time or services in support of CSBS&C activities.

“Patron” – an individual who has a Keith C. Wills Library card.

“Personal information” – information about an identifiable individual that is recorded in any form but excludes the individual’s name, business title, and business contact information. Examples of personal information are contact, biographical, financial, educational, family and employment information.

“Canadian Southern Baptist Seminary & College” – CSBS&C and Keith C. Wills Library.

“Staff” – individuals who are full-time and part-time employees of CSBS&C (including IMB & NAMB faculty). This also includes volunteers and individuals who are authorized to act as agents of CSBS&C.

“Student” – an individual who has submitted an application for admission into CSBS&C or who has registered for at least one course with CSBS&C.

“Third-party” – an individual or organization other than CSBS&C.

“Use” – the treatment, handling and management of personal information by and within CSBS&C.

## **ACCOUNTABILITY**

CSBS&C is responsible for the protection of all personal information under its control. Senior management is responsible for ensuring compliance with CSBS&C privacy policy and may designate one or more employees to be accountable for compliance with the policy. CSBS&C has designated its Privacy Officer to take overall responsibility for the protection of personal information and compliance with this policy.

CSBS&C shall implement policies and procedures to:

- a. protect personal information;
- b. receive and respond to complaints and inquiries;
- c. train and communicate to staff regarding privacy policies and practices; and
- d. communicate CSBS&C privacy policies and practices publicly.

## **PURPOSES FOR COLLECTION**

CSBS&C shall identify the purposes for which personal information is being collected at or before the time of collection. CSBS&C shall communicate either orally or in writing the purposes for which personal information is collected at the time of collection.

CSBS&C shall not use or disclose for any new purpose any personal information without first identifying and documenting the purpose and obtaining the consent of the individual concerned. The main purposes for which CSBS&C collects personal information are as follows.

### **Students**

Personal information of students is collected to fulfill the following purposes:

- Determine eligibility for admission to CSBS&C;
- Provide student housing;
- Provide educational services;
- Process financial transactions and applications for financial aid;
- Generate statistical information;
- Graduation activities;
- Maintain a relationship with students after completion of their studies at CSBS&C;
- Provide accurate information to a third party when the student has requested a reference;
- Comply with legal and regulatory requirements.

### **Alumni**

Personal information of alumni is collected to fulfill the following purposes:

- For communication: Mailing/E-mail/Telephone/Face-to-face contact for the objective of relating CSBS&C activities/events/news;
- Establish and maintain responsible relations with alumni and to provide ongoing service;
- Generate statistical information;
- Understand alumni needs and preferences;
- Develop, enhance, advise and provide products and services;
- Provide accurate information to a third party when the alumnus has requested a reference;
- Comply with legal and regulatory requirements.

### **Donors**

Personal information of donors is collected to fulfill the following purposes:

- For communication: Mailing/E-mail/Telephone/Face-to-face contact for the objective of relating CSBS&C activities/events/news;
- For administration and maintenance of donation information and to ensure compliance with legal and regulatory requirements;
- For advancement: Facilitation of fundraising activities to provide support programs and projects;

### **Customers**

Personal information of customers is collected to fulfill the following purposes:

- Establish and maintain responsible commercial relations with customers;
- Provide ongoing service;
- Understand customers' needs and preferences;
- Develop, enhance, market or provide products and services;
- Provide commercially related discounts and incentives;
- Comply with legal and regulatory requirements.

## **Patrons**

Personal information of patrons is collected to fulfill the following purposes:

- Provide library services;
- Notification of overdue items;
- Notification of items requested by other patrons, in the case of those patrons with extended loans privileges;
- Communication with patrons when there are problems with their account, such as the replacement fee for a lost item;
- Communication with patrons when an item requested has been located;
- Comply with legal and regulatory requirements.

## **Staff**

Personal information of staff is collected to fulfill the following purposes:

- Provide payroll services;
- Maintain CSBS&C and staff relationship;
- Statistics related to accreditation;
- Provide accurate information to a third party when the staff person has requested a reference;
- Comply with legal and regulatory requirements.

## **CONSENT**

The knowledge and consent of individuals, expressed or implied, are required for the collection, use and disclosure of personal information. Consent will not be obtained through fraudulent means or by deceptive methods, and clear communication will be employed to fairly and reasonably draw the individual's attention to the issue of consent.

### *Obtaining Consent*

An individual's expressed consent is communicated to CSBS&C either personally or through an authorized representative. As appropriate, individual expressed consent to the collection, use and disclosure of personal information in exclusive conditions will be sought. In other circumstances, CSBS&C will seek implied consent from individuals in situations where it is more fitting to seek consent through "opt-out" opportunities presented through application forms, direct mail publications, e-mail or other

communication methods. Where such mechanisms are not employed by an individual, CSBS&C shall be entitled to assume that the individual has consented.

#### *Withdrawal of Consent*

Any individual may withdraw his or her consent to the collection, use or disclosure at any time, subject to legal or contractual restrictions and reasonable notice. CSBS&C shall comply with these requests and inform the individual of the implications and restrictions of such withdrawal of consent.

#### *Consent Non-requirement*

As prescribed by legislation, staff may lawfully collect personal information without the knowledge or consent of the individual only under certain circumstances. Some examples are:

- Where collection of the personal information is clearly in the interest of the individual and consent cannot be obtained in a timely way.
- When collection and use of personal information is required in the case of an emergency that threatens the life, health or security of an individual.
- Where collection of the personal information with the knowledge or consent of the individual would compromise the availability of the accuracy of the information and the collection is reasonable for purposes of an investigation or a proceeding.
- When the information is already publicly available.
- When the information is collected from another organization that collected it with the consent of the individual and the information is collected solely for the purposes for which it was previously collected and to assist that organization.

### **LIMITING COLLECTION**

Collection of personal information shall be limited to that which is necessary for the purposes identified by CSBS&C. The collection of personal information shall primarily be obtained from the individual concerned with their consent, either expressed or implied, through fair and lawful means.

#### *Means of Collection*

Personal information may be collected in many ways including, but not limited to:

- Personal communications between the individual and staff of CSBS&C.
- Publicly available information.
- Responses to mailings or other advertising media.
- Communications from authorized representatives of individuals.

### **USE, DISCLOSURE AND RETENTION**

CSBS&C shall not use or disclose personal information for purposes other than that for which the information was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as is necessary for the fulfillment of those purposes. Personal information that is no longer

required for its identified purposes or for legal or business requirements shall be destroyed or made anonymous.

CSBS&C shall not sell, rent or loan the personal information of its students, donors, alumni, customers, employees or patrons (e.g., mailing lists) to third parties. The names and addresses of members of CSBS&C's mailing lists to mail handling agencies may be disclosed without consent. Otherwise personal information is not disclosed to any third party even those whose purpose could be construed to be compatible with that of CSBS&C. In disclosing personal information to third parties, CSBS&S shall make every reasonable effort to ensure that the organizations to which the information is disclosed use that information only for the purposes for which it was disclosed.

#### *Employees of Canadian Southern Baptist Seminary & College*

Access to records is permitted only to CSBS&C staff whose official responsibilities require such access. Furthermore, access is limited, as much as is feasible, to the extent that is consistent with those responsibilities.

Personal information about an individual will be disclosed to a member of CSBS&S staff only where that information is judged to be consistent with the official duties of that person or committee. For example, personal information about a scholarship applicant will be disclosed to members of the Scholarship Committee for the purpose of evaluating the applicant's eligibility for the scholarship.

Faculty has access to contact information for all students in the online database. As student advisors faculty also have access to transcript information for their advisees.

In all cases, those who are permitted access to student records and those who receive personal information pertaining to specific individuals shall be advised of the privacy policy and shall be required to sign the Privacy Agreement.

### **ACCURACY**

CSBS&C shall make reasonable efforts to ensure that all personal information collected is accurate and complete, and shall also make reasonable efforts to keep the personal information up-to-date. It is the responsibility of the individual to whom the information relates to notify CSBS&C of any changes or corrections to that information. Inaccurate information shall be corrected upon request made by the individual whom the information relates. Supporting legal documentary evidence may be requested to substantiate the request.

### **SAFEGUARDS**

CSBS&C shall ensure the security of all personal information that is retained. Security arrangements will be employed to protect personal information against loss or theft, as well as against unauthorized access, disclosure, copying, use, modification, or disposal. Personal information shall be protected regardless of the format in which it is held. The

nature of the safeguards will vary depending on the sensitivity of the personal information that has been collected, the amount, distribution, and format of the information, and the method of storage. More sensitive personal information will be safeguarded at a higher level of protection.

#### *Methods of Protection*

- Physical – locked filing cabinets, restricted access to offices, security systems with individual password protection.
- Organizational – disclosure of personal information within CSBS&C shall be limited to those whose job responsibilities require access to such information.
- Technological – Software security on mainframe and individual computers is ensured through passwords and restrictive access.

#### *Education*

Staff are regularly advised of privacy issues and their role in ensuring the protection of personal information.

#### *Destruction of personal information*

CSBS&C shall ensure that care and attention is paid to the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

### **OPENNESS**

CSBS&C shall ensure that its policies and procedures to ensure the privacy of personal information are communicated in a fashion that allows for access to this information without unreasonable effort. This Policy will be made available in a form that is reasonable and understandable.

CSBS&C shall make available on its website:

- The address and contact information of the Privacy Officer at CSBS&C.
- The complete Canadian Southern Baptist Seminary & College Privacy Policy.

### **INDIVIDUAL ACCESS**

Upon a request in writing, CSBS&C shall inform an individual of the existence, use and disclosure of his or her personal information and the individual shall be given access to that information, except where the law requires or permits CSBS&C to deny access. CSBS&C shall comply with the request within thirty days upon receipt of a request.

CSBS&C may lawfully deny access by an individual to his or her personal information where:

- The information is protected by solicitor/client privilege.
- Disclosure of personal information results in the disclosure of the personal information of another individual.

Students and alumni may not inspect and review confidential letters and references associated with admissions, employment or job placement or education records containing information about more than one student. When records pertain to more than one student the institution will permit access only to that part of the record which pertains to the inquiring student.

If CSBS&C denies an individual's request for access to his or her personal information, the individual shall be notified of the reasons. The individual may then challenge this decision.

CSBS&C shall ensure that when an individual successfully demonstrates the inaccuracy or incompleteness of personal information, CSBS&C shall amend the information as required.

## **COMPLIANCE AND COMPLAINTS**

An individual shall be able to direct a challenge concerning compliance with any of the principles laid out in this Privacy Policy to the Privacy Officer.

All complaints will be investigated. If the Privacy Officer finds that a complaint is justified, CSBS&C will take appropriate measures, including, if necessary, amending its policies and procedures. The complainant shall be notified of the outcome of the investigation regarding his or her complaint.

If the Privacy Officer is unable to address the complainant's concerns, the issue can be referred to the Office of the President.

Contact information:  
Privacy Officer (Director of Finance & Administration)  
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