

REGENT COLLEGE PRIVACY POLICY

INTRODUCTION

Regent College respects the privacy of the personal information of its employees, students, donors, alumni, customers and other stakeholders. Regent 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.

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

SCOPE

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

This policy does not apply to information collected, used or disclosed with respect to corporate or commercial entities. However, Regent is committed to the protection of the confidentiality of this information.

DEFINITIONS

“Alumni” – individuals who have attended Regent 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 Regent for a minimum of one course (e.g., Summer School).

“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 orally, electronically or in writing and is unequivocal and does not require any inference on the part of Regent. 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 Regent. This includes customers of Regent Bookstore, individuals who enter into rental arrangements with Regent, subscribers to Regent publications or journals such as CRUX or the Regent Chinese Journal and individuals who attend Regent’s conferences.

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

“Donor” – individual who has donated money in support of Regent’s activities.

“Patron” – an individual who has a Regent-Carey Library card.

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

“Regent” – Regent College, Regent Bookstore and Regent-Carey Library.

“Staff” – individuals who are full-time and part-time employees of Regent (including faculty and teaching assistants). This also includes volunteers and individuals who are authorized to act as agents of the College.

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

“Third-party” – an individual or organization other than Regent.

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

ACCOUNTABILITY

Regent is responsible for the protection of all personal information under its control. Senior management is responsible for ensuring compliance with Regent’s privacy policy and may designate one or more employees to be accountable for compliance with the policy.

Regent has designated its Privacy Officer to take overall responsibility for the protection of personal information and compliance with this policy.

Regent 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 Regent's privacy policies and practices publicly.

PURPOSES FOR COLLECTION

Regent shall identify the purposes for which personal information is being collected at or before the time of collection. Regent shall communicate either orally or in writing the purposes for which personal information is collected at the time of collection. Regent 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 Regent collects personal information are as follows.

Students

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

- Determine eligibility for admission to Regent;
- Assist students in relocating to the Vancouver area;
- Provide educational services;
- Process financial transactions and applications for financial aid;
- Facilitate the provision of services offered to members of the Alma Mater Society of the University of British Columbia;
- Facilitate students' membership with the Vancouver School of Theology Library;
- Generate statistical information;
- Maintain a relationship with students after completion of their studies at Regent;
- Provide accurate information to a third party when the student has requested a reference; and
- 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 Regent's activities/events/news;
- Establish and maintain responsible relations with alumni and to provide ongoing service;

- Understand alumni needs and preferences;
- Develop, enhance, advise and provide products and services; and
- 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 Regent's 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 for Board approved programs and projects; and
- Comply with legal and regulatory requirements.

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;
- Manage and develop Regent Bookstore's business and operations; and
- 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; and
- 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 Regent 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, Regent will seek implied consent from individuals in situations where it is more fitting to seek consent through "opt-out" opportunities presented through direct mail publications, telephone, e-mail or other communication methods. Where such mechanisms are not employed by an individual, Regent 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. Regent 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 Regent. 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 Regent.
- Publicly available information.
- Responses to mailings or other advertising media.
- Communications from authorized representatives of individuals.
- Responses from Regent sponsored, or co-sponsored, events or activities.

USE, DISCLOSURE AND RETENTION

Regent 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. Personal information used to make a decision which affects an individual to whom the personal information relates shall be retained for no less than one year from the time of notifying the individual of the decision.

Regent 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. Except as stated below, personal information is not disclosed to any third party even those whose purpose could be construed to be compatible with that of Regent College. In disclosing personal information to third parties, Regent 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.

Third parties

The following personal information may be disclosed to a third party without consent:

- The credentials Regent College has awarded to the student and the date those credentials were awarded.

- The names of recipients and the amounts of scholarships, bursaries or awards that have been conferred by Regent College.
- The names and addresses of members of Regent's mailing lists to mail handling agencies.

As permitted by legislation, personal information may be disclosed without consent in certain circumstances. These include, but are not limited to, the following:

- Where the disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- Where the disclosure is necessary in order to collect a debt owed to the organization or for the organization to repay an individual money owed to them by the organization; and
- Where the disclosure is to a law enforcement agency in Canada, concerning an offence under the laws of Canada or a province, to assist in an investigation.

In all other cases, personal information of an individual will not be disclosed to a third party unless consent has been obtained.

Campus Organizations

Certain personal information such as names, student identification numbers and contact information of all students who pay the Regent College Student Association fee may be disclosed to the following:

- Regent College Student Association (RCSA), in order for it to provide membership services (e.g., hold elections); and
- University of British Columbia (UBC) and its Alma Mater Society (AMS), for the purpose of providing AMS membership services, UBC Library services, AMS/GSS Health and Dental Plan services, and U-Pass services.

Names, student identification numbers and contact information of all students who register in a term will be disclosed to the Vancouver School of Theology Library in order for it to provide membership services to those students.

Employees of Regent College

Access to records is permitted only to Regent 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 Regent staff or to members of a College committee 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 Financial Aid Committee for the purpose of evaluating the applicant's eligibility for the scholarship; or, a list of students in a specific concentration will be provided to faculty who teach in that concentration.

The Office of the Registrar routinely distributes to faculty, and to their teaching assistants, class lists and grade rosters. The contact information of students registered for classes will also be provided to faculty and their teaching assistants upon request.

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.

Officials and Official Agencies

Personal information concerning individuals may be disclosed when it is legally required to do so (e.g., information required by subpoena or court order).

Regent provides personal information of students to Statistics Canada as required. Regent also provides personal information of individuals to Canada Customs and Revenue Agency. Students may appeal to Statistics Canada to have their personal information removed from its database.

ACCURACY

Regent 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 Regent 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

Regent 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 Regent 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.

Third Party Disclosure

In the event that a third party becomes an agent of Regent for the purposes of using personal information in the implementation of College tasks and projects, Regent will require the third party to safeguard all personal information in a way that is consistent with Regent's policies and practices and that complies with the principles laid out in this Privacy Policy.

Destruction of personal information

Regent 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

Regent shall ensure that its policies and procedures that 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.

Regent shall make available:

- The address and contact information of the Privacy Officer at Regent.
- The means of gaining information to personal information held by Regent.
- A description of the type of personal information retained by Regent and its use.
- The complete Regent College Privacy Policy.

Communication tools that will be employed to highlight the above shall include, but is not limited to:

- Notice in the *Regent World and Alumni World* publications.
- Notice in other Regent publications.
- A copy available on Regent's website.

INDIVIDUAL ACCESS

Upon a request in writing, Regent 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 Regent to deny access. The individual must provide sufficient information to permit Regent, with a reasonable effort, to provide an account of the existence, use and disclosure of personal information. This information provided will only be used to respond to the request for access made by the individual. Regent shall comply with the request within thirty days upon receipt of a request.

Regent 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.

If Regent 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.

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, Regent 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

Regent College

5800 University Boulevard

Vancouver, BC

V6T 2E4

Phone: 604-224-3245

Fax: 604-224-3097

Email: privacyofficer@regent-college.edu