

 <p>Capilano Students' Union</p>	<b>Policy No.</b>	<b>Approval Authority</b>
	PR-01	Board of Directors
	<b>Policy Name</b>	<b>Approval Date</b>
	<b>Privacy Policy</b>	<b>June 30, 2017</b>
	<b>Responsible</b>	<b>Scheduled Review</b>
	Executive Committee	June 2018

## Purpose

The Capilano Students' Union is required to collect, use, and disclose personal information of employees, directors, and our members on a daily basis to carry out our operations. In all of these activities, we are required to comply with the *Personal Information Protection Act*, S.B.C. 2003, c. 68. This policy sets out the principles by which we discharge these privacy-related duties and responsibilities.

## Scope

This policy applies to all managers, employees, executives, board members, and volunteers.

## Principles

- 1. We will be accountable.** The Capilano Students' Union is accountable for the protection of all personal information under our control, even if the student society does not actually have custody of the information. The executive director is accountable for the student society's privacy compliance, and for developing and implementing personal information procedures. We will hold ourselves accountable for non-compliance – and that could include discipline or dismissal.
- 2. We will identify the purpose.** The Capilano Students' Union shall identify, before we collect personal information from an individual, the reason for the information's collection and how it is going to be used; document our reasons for collecting and using personal information; and renew our consent for the use of personal information if our reasons for using that information change.
- 3. We will obtain informed consent.** The Capilano Students' Union shall proactively communicate the reasons for collecting personal information, in terms that our members can clearly understand; inform individuals, in a meaningful way, of our reasons for the collection, use, and disclosure of personal information; and obtain informed consent before or at the time of collection (or when our purposes for collecting personal information change).
- 4. We will limit collection.** The Capilano Students' Union shall not collect personal information indiscriminately; we shall only collect information that is essential to the delivery of our operations, including programs, services, campaigns, events, and other activities.
- 5. We will limit use, retention, and disclosure.** The Capilano Students' Union shall use personal information that we have collected only for reasonable purposes that we have communicated in advance. We will only keep information for as long as we absolutely need to keep it, and after that, we will securely destroy, erase, or make anonymous any unnecessary personal information.
- 6. We will be accurate.** The Capilano Students' Union shall take reasonable steps to keep the personal information in our custody and control accurate, complete, and up-to-date. We will take particular care to verify the accuracy of personal information before using it to make a decision about an individual, and before disclosing any personal information to a third party.

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7. **We will use appropriate safeguards.** The Capilano Students' Union shall apply appropriate security measures for the protection of personal information (irrespective of format), including physical, technological, and administrative controls. We will take reasonable steps to prevent unauthorized access, collection, use, disclosure, modification, or destruction of personal information by any individuals, whether internal or external to the student society.
8. **We will be open.** The Capilano Students' Union shall make the contact information for the executive director available to the public, as the person responsible for our privacy practices. We will make available to our employees, members, and the public the process by which they can access and correct personal information, or to make a complaint about access decisions of the student society. We will openly publish information about the student society's privacy practices.
9. **We will provide individual access.** When individuals request to access personal information, we will accommodate that access within thirty (30) business days, explain how their personal information has been used, and to whom that information has been disclosed. When we cannot accommodate access, we will communicate the legal reasons for refusal within thirty (30) days, and provide information about how to request a review of our decision. If corrections to personal information are requested, the corrections shall be made promptly, and we will communicate those corrections to any third parties to whom that personal information has been disclosed.
10. **We will provide channels for recourse.** The executive director is responsible for developing a simple and straightforward procedure for handling complaints under this policy. All complaints shall be investigated, and the Capilano Students' Union shall take reasonable steps to correct our privacy practices as a result of complaints received. We will openly communicate to complainants the internal recourse channels available to them, and how to submit a complaint to the Office of the Information and Privacy Commissioner of British Columbia.

## Delegation

The board delegates the administration of this policy, and the authority to create privacy and information procedures and practices to support and advance this policy, to the executive director.

## Related Laws, Policies, and Procedures

[Personal Information Protection Act, S.B.C. 2003, c. 68](#)

[Privacy Procedures](#) (Capilano Students' Union)

[Privacy Policy Acknowledgement](#) (Capilano Students' Union)

## Endorsement

[original signed]  
Christopher Girodat  
Executive Director

[original signed]  
Perry Safari  
VP Finance & Services