

Columbia Bible College Privacy Policy

Introduction

Columbia Bible College (CBC) recognizes the importance of and is committed to the protection of the personal information of its community (students, faculty, staff, alumni, donors, volunteers and directors). CBC is bound by the requirements of Bill 38 – the Personal Information Protection Act (PIPA) and collects, uses or discloses personal information in accordance with its provisions.

Definitions

“**Personal Information**” means information about an identifiable individual and includes employee personal information but does not include

- (a) contact information, or
- (b) work product information;

“**Collection**” – the act of gathering, acquiring, or obtaining personal information from any source, by any means.

“**Consent**” – involves voluntary agreement with what is being done or proposed. Consent may be expressed or implied. Express consent signifies that an individual, knowing what personal information is being collected and for what purposes, willingly agrees to the information being collected, used and disclosed as notified. It may be given in writing or verbally. Implied consent exists when an individual is “deemed” to consent to collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

1. Accountability

- Columbia Bible College is responsible for the confidentiality of personal information in its custody or under its control in compliance with the applicable provincial legislation.
- CBC has appointed a Privacy Officer to be responsible for implementing the privacy program and ensuring compliance with legislation.
- Members of the CBC community (employees, volunteers, donors and directors) are responsible for day-to-day compliance with this Privacy Policy.

2. Identifying Purposes

- Columbia Bible College will always endeavor to communicate the purposes for which personal information is collected at or before the time the information is collected.
- CBC collects personal information for the following reasons:
 - To enroll students to our academic institution
 - To employ staff and faculty
 - To develop and manage services to meet the needs of our students, employees, donors, alumni, affiliate organizations, parents of students, suppliers, volunteers, and directors
 - To meet regulatory requirements

3. Consent

- Columbia Bible College will collect, use or disclose personal information only with knowledge and consent, except where required or permitted by law.
- CBC collects and uses personal information for purposes that include:
 - Assess applicants for acceptance and process tuition payment information;
 - Registration of applicants;
 - Contact with students, employees, alumni, directors or donors when required;
 - Graduation activities for graduating students and their families;
 - Preparation for Student, Staff and Faculty Directories;

- Preparation of the annual Accreditation and Regulatory Reports;
- Event, product or service notification to constituents;
- For counseling services provided to CBC in accordance with CBC's Counseling Services Policy.
- Consent may be implied in some situations while express consent is required for confidential and sensitive information. CBC reserves the right to disclose information where required or allowed by law.
- Consent may be withdrawn at any time, on reasonable notice, subject to legal or contractual restrictions.

4. Limiting Collection

- Columbia Bible College will limit collection of personal information to what is necessary for the purposes for which it is collected.
- CBC will always collect personal information by fair and lawful methods.

5. Limiting Use, Disclosure and Retention

- Personal information will only be used or disclosed for the purpose for which it was collected, except with the individual's consent or as required or permitted by law.
- Personal information will be retained only as long as necessary for fulfillment of the purposes for which it was collected, or as required by legislation.

6. Accuracy

- Columbia Bible College will make reasonable efforts to ensure that personal information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, CBC relies on its constituents to ensure that certain information, such as the constituents address or telephone number, is current, complete, and accurate.
- From time to time CBC may contact the individual to ensure that the information collected is or remains accurate and up-to-date.

7. Safeguards

- CBC protects personal information by security safeguards appropriate to the sensitivity of the information, including through the use of the following measures:
 - Physical (i.e. locked filing cabinets, restricted access, appropriate security measures when disposing of personal information)
 - Organizational (i.e. security clearances, access only on a "need to know" basis)
 - Technological (i.e. passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees.

8. Right of Access

- CBC is open about the policies and procedures it uses to protect personal information. Any inquiries may be made to our Privacy Officer.
- Upon written request, CBC will within a reasonable time period, tell the individual what personal information it has, for what it is being used, and to whom it has been disclosed if applicable and within the time period for which records are available.
- Individuals have the right to challenge the accuracy and completeness of their information and have it amended if it is inaccurate, incomplete or out-of-date.
- In certain circumstances, CBC may refuse to disclose personal information:
 - where required by law, certain personal information may not be disclosed;
 - where the information contains personal information about another individual;
 - where the information is of such a nature that its disclosure could reasonably be expected to prejudice the mental or physical health of the individual;
 - where the information was gathered in the course of a formal dispute resolution process;
 - where the information is subject to solicitor-client or litigation privilege.

9. Compliance and/or Contact

- Requests for access to information, issues or complaints about CBC's compliance with this Policy regarding the handling of personal information, and questions or comments about this Policy may be addressed to Columbia Bible College's Privacy Officer.
 - Columbia Bible College
2940 Clearbrook Road
Abbotsford, BC V2T 2Z8
Attention: Privacy Officer (*Name*)
- If the Privacy Officer is unable to address the concerns, the issue can be referred to Administration.
- At any point the individual may also write to the Privacy Commissioner of British Columbia.
 - Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038, Stn. Prov. Govt.
Victoria, BC V8W 9A4
Phone: (250) 387-5629
Fax: (250) 387-1696
Email: info@oipc.bc.ca