



## P-1: PERSONAL INFORMATION AND PRIVACY POLICY

*POLICY TYPE: PRIVACY AND INFORMATION MANAGEMENT POLICY*

*POLICY TITLE: PERSONAL INFORMATION AND PRIVACY*

*POLICY REFERENCE NUMBER: P-1*

*Adopted: April 23, 2021*  
*Next Scheduled Revision: April 2022*  
*Previous Revisions*

Position	Signature	Date
President		

### Policy

This policy aims to establish the standards according to which all SFSS processes will collect, use, disclose, ensure accuracy of, protect, and retain personal information, ensuring thereby that all obligations under British Columbia's *Personal Information Protection Act* (PIPA), and Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA) only if personal information crosses provincial or national borders, are respected.


The Research and Policy Coordinator serves as the Privacy Officer of the Simon Fraser Student Society (SFSS).

### Definitions

1. 'Personal information' means information about an identifiable individual which includes, but is not limited to names, home addresses and telephone numbers, age, sex, gender identity, marital or family status, SIN, identifying number, race, national or ethnic origin, colour, religious or political beliefs or associations, educational history, medical history, disabilities, blood type, employment history, financial history, criminal history, anyone else's opinions about an individual, an individual's personal views or opinions, and name, address and phone number of parent, guardian, spouse or next of kin. Personal information includes employee personal information but does not include workplace contact information or *work product information*.
2. 'Work production information' means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not

- include personal information about an individual who did not prepare or collect the personal information. Work product information may be written or verbal information.
3. 'Privacy Officer' means the individual designated responsibility for ensuring that the SFSS complies with this policy and with the obligations of PIPA.

### Standards

4. The Society will ensure that:
  - a. the purpose for the collection, use, and disclosure of any personal information is clear or evident,
  - b. the process for obtaining consent for the collection, use, and disclosure of personal information is clear or evident
  - c. the collection, use, and disclosure is limited to what is necessary for the conduct of its operations and to establish and manage employment relationships,
  - d. requestors reserve the right to maintain access to and request the correction of their personal information,
  - e. the personal information it collects is accurate,  the personal information it collects is protected,
  - g. the personal information it collects is retained in a manner consistent with applicable regulations,
  - h. there are clear schedules for the retention and destruction of the personal information it possesses,
  - i. Councillors, staff, and volunteers are trained so as to ensure they comply with the requirements of this policy,
  - j. annual privacy audits of Society will be conducted,
  - k. there are procedures for the prevention, reporting, containment, remediation and notification of an information incident, and
  - l. complaints, inquiries, or requests for the access to, correction of and/or removal of personal information

### *Purpose of collection*

5. Personal information will only be collected, used, or disclosed where required by the provision of Society services or programming, or the Society's adherence to its legal obligations.

### *Process for obtaining consent*

6. The Society will obtain consent to collect, use, or disclose personal information at the time of collection, except for the purposes of, for instance:
  - a. acquiring the SFSS member registry, and
7. Subject to certain exceptions (e.g. the personal information is necessary to providing a service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent.

8. The SFSS shall ensure that the following, or similar language shall be included in or posted clearly by all sign up sheets, petitions, and any other forms or documents designed to collect personal information for the Society and its branches: “This form has been created in compliance with the Personal Information Protection Act. The personal information you provide will be used solely for \_\_\_\_\_ [fill in purpose here]. By providing it, you give the Simon Fraser Student Society [or name of department] consent to use this information in this way only. This information will be kept confidential and will not be sold or traded to any other organization. If you do not consent to this, please refrain from providing us with your information.”

*Limitations on collection, use, and disclosure*

9. The Society will only collect, use, or disclose personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as the conduct of surveys intended to enhance the provision of our programs and services.

*Access to personal information and requests for correction and removal of personal information*

10. Clients have the right to access and request to correct and remove their personal information.
11. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
  - a. Such a request shall be responded to within 30 days.
12. A request to correct or remove personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
13. A minimal fee of no more than one dollar may be charged for providing access to personal information.
14. The Society will respond to requests from requestors no later than 30 days after the requestor’s request, unless:
  - a. the request is not detailed enough to identify the personal information requested,
  - b. a large amount of personal information is requested or must be searched and meeting the time limit would unreasonably interfere with the operations of the Society, or
  - c. more time is needed for the Society to consult with another organisation or public body to decide whether or not to provide the requestor access to the requested document or information.
15. If a request is refused in full or in part, we will provide the reasons for refusal and the recourse available to the requestor. Requests may be denied if they reveal personal

information about another individual, threaten the safety and/or health of another individual, or reveal third party information without their consent, among other things.

*Assurances of accuracy*

16. The Society will make every reasonable effort to ensure that the personal information it uses is accurate and complete. Upon request by an individual to whom information relates, the Society will correct or annotate the information with a correction when documentary evidence, satisfactory to the Society, is provided to substantiate the correction

*Assurances of protection*

17. The Society will protect personal information by making reasonable security arrangements to prevent the risk of unauthorized collection, access, use, disclosure or disposal of personal information.

*Assurances of retention*

18. The Society will retain personal information for a period of at least one year.

*Schedule for retention and destruction of personal information*

19. The schedule for retention and destruction of any and all personal information in the control of the Society will be outlined in SFSS Personnel Policies.

*Training for Councillors, staff and volunteers*

20. The Society will provide training to Councillors, staff and volunteers upon hire on the SFSS Privacy Policies. New Councillors, staff and volunteers are required to provide their signature indicating they have completed the aforementioned training during orientation. Current Councillors, staff and volunteers are required to provide their signature upon completion of the aforementioned training.

*Privacy audits*

21. Annual privacy audits of Society operations will be conducted by the Privacy Officer to ensure that the Society is compliant with Society policies and procedures, and that there is continuous improvement in privacy and information management practices.

*Information incident*

22. The Society will establish an information incident procedure, which will include steps on preventing (including risk identification), reporting, containing, remediating, and notifying those affected of an information incident.

*Complaints, inquiries or requests*

23. Complaints, inquiries, or requests for the access to, correction of and/or removal of personal information should be directed, in writing, to the Campaigns, Research and Policy Coordinator, who is the Privacy Officer of the Society. If the Privacy Officer is unable to resolve the concern, the Information and Privacy Commissioner of British Columbia may be contacted. The Privacy Officer may be contacted by email at [policy.research@sfss.ca](mailto:policy.research@sfss.ca)

