

FAIRLEIGH DICKINSON UNIVERSITY - VANCOUVER PERSONAL INFORMATION PROTECTION POLICY

At Fairleigh Dickinson University-Vancouver (FDU-Vancouver), we are committed to maintaining the highest ethical standards in our interactions with our constituents. As our interactions often involve the collection, use and disclosure of personal information about our constituents, protecting their personal information is one of our highest priorities.

This privacy policy explains the principles and procedures that FDU-Vancouver follows regarding the collection, use and disclosure of constituent personal information. It has been developed in compliance with British Columbia's *Personal Information Protection Act* (PIPA) which came into effect on January 1, 2004.

We will inform our constituents of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

Our privacy commitment includes ensuring the accuracy, confidentiality and security of our constituents' personal information and allowing our constituents to request access to, and correction of, their personal information.

Constituent personal information is collected, stored and maintained at the Canadian campus in Vancouver and the two U.S. campuses in New Jersey in a manner that is consistent with PIPA guidelines.

DEFINITIONS

Personal Information – means information about an identifiable individual, including name, age, home address and phone number, social insurance number, marital status, income, credit history, medical information, education and employment information. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Constituent – means anyone who has requested information about or has applied for an academic program, an employment opening, or is an enrolled student, an alumnus or alumna, agent, employee or other affiliate, including parents of students, vendors, service providers and others who willingly participate in a business or social relationship with FDU-Vancouver.

Privacy Officer – means the individual designated responsibility for ensuring that FDU-Vancouver complies with this policy and PIPA.

COLLECTING PERSONAL INFORMATION

Unless the purposes for collecting personal information are obvious and the constituent voluntarily provides his or her personal information for those purposes, FDU-Vancouver will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

FDU-Vancouver will only collect constituent information that is necessary to fulfill the following purposes:

- To verify a constituent's identity;
- To assess a constituent's suitability for: admission to an academic program; for employment; for an affiliate relationship with FDU-Vancouver; or for participation in an FDU-Vancouver sponsored activity or event.
- To verify a constituent's academic credentials;
- To verify a constituent's employment history;
- To process tuition and salary payments;
- To manage, maintain and update academic records;
- To manage, maintain and update employment records;
- To understand the financial needs of our students;
- To provide academic and other counselling services;
- To distribute academic program information;
- To contact our constituents to offer services or for fundraising;
- To ensure a high standard of service to our constituents;
- To meet regulatory requirements.

CONSENT

FDU-Vancouver will obtain consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent). Consent can be provided orally, in writing, electronically, through an authorized representative, or it can be implied where the purpose of collecting, using or disclosing the personal information would be considered obvious and the constituent provides personal information for that purpose.

Consent may also be implied where a constituent is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services, products or fundraising, or the constituent does not opt-out.

Subject to certain exceptions (e.g., the personal information is necessary to provide the service, or the withdrawal of consent would violate the performance of a legal

obligation), constituents can withhold or withdraw their consent for FDU-Vancouver to use their personal information in certain ways. A constituent's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the constituent in making the decision.

FDU-Vancouver may collect, use or disclose personal information without the constituent's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

USING AND DISCLOSING PERSONAL INFORMATION

FDU-Vancouver will only use or disclose constituent 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:

- To conduct surveys in order to enhance the provision of our services;
- To contact our constituents directly about products and services that may be of interest;
- To aid a student in transferring to or from another educational institution;
- To aid a student in fulfilling financial aid, immigration or insurance requirements;
- To transfer constituent information between FDU campuses in order to provide constituents with beneficial information and/or services.

FDU-Vancouver will not use or disclose constituent information for any additional purpose unless we obtain consent to do so.

FDU-Vancouver will not sell constituent lists or personal information to other parties.

RETAINING PERSONAL INFORMATION

If FDU-Vancouver uses constituent personal information to make a decision that directly affects the constituent, we will retain that personal information for at least one (1) year so that the constituent has a reasonable opportunity to request access to it.

FDU-Vancouver will retain constituent personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose or as required by legislation.

ENSURING ACCURACY OF PERSONAL INFORMATION

FDU-Vancouver will make reasonable efforts to ensure that a constituent's personal information is accurate and complete where it may be used to make a decision about the constituent or disclosed to another organization.

Constituents may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

A request to correct personal information should be forwarded to FDU-Vancouver's Privacy Officer.

If the personal information is demonstrated to be inaccurate or incomplete, FDU-Vancouver will correct the information as required and send the corrected information to any organization to which we have disclosed the personal information in the previous year. If the correction is not made, we will note the constituent's correction request in the file.

SECURING PERSONAL INFORMATION

FDU-Vancouver is committed to ensuring the security of constituents' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Appropriate security measures are followed to ensure that constituent personal information is appropriately protected, these include: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords and firewalls on secured servers; and limiting employee access to personal information on a need-to-know basis.

FDU-Vancouver will use appropriate security measures when destroying a constituent's personal information.

FDU-Vancouver will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

PROVIDING CONSTITUENTS WITH ACCESS TO PERSONAL INFORMATION

Constituents have a right to access their personal information.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

Upon request, FDU-Vancouver will tell constituents how we use their personal information and to whom it has been disclosed if applicable.

FDU-Vancouver will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

If a request is refused in full or in part, we will notify the constituent in writing, providing the reasons for refusal and the recourse available to the constituent.

QUESTIONS AND COMPLAINTS: THE ROLE OF THE PRIVACY OFFICER

The Privacy Officer is responsible for ensuring FDU-Vancouver's compliance with this policy and the Personal Information Protection Act.

Constituents should direct any complaints, concerns or questions regarding FDU-Vancouver's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the constituent may also write to the Information and Privacy Commissioner of British Columbia.

Mr. David O'Reilly, Privacy Officer
FDU-Vancouver
842 Cambie Street
Vancouver, BC
Canada, V6B 2P6