

Personal Information Protection Policy

Introduction

At Quest University (“Quest”), we are committed to providing individuals who belong to or seek to join the academic community at Quest, whether as students or employees, with the opportunity to enjoy the benefits of participation in a vibrant, innovative, and growing academic community. Providing this opportunity requires Quest to collect, to use, and to disclose personal information about members and prospective members of the academic community at Quest. Protecting such personal information is one of Quest’s high priorities. Accordingly, Quest manages the collection, use, and disclosure of personal information utilizing best practices derived from British Columbia’s *Personal Information Protection Act* (PIPA).

In the normal course, Quest will inform an individual whose personal information Quest collects about why and how Quest collects, uses, and discloses his/her personal information. Quest will obtain an individual’s consent when such consent is required, and manage his/her personal information in a manner that a reasonable person would consider appropriate in the circumstances.

In compliance with the requirements of PIPA, Quest’s Personal Information Protection Policy outlines the principles and practices Quest will follow to protect personal information sought or held by Quest. Quest’s privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information Quest seeks or holds and allowing an individual who is a member or prospective member of Quest’s academic community to request access to, and correction of, his/her personal information.

Definitions

Personal Information – means information about an identifiable individual including without limitation his/her name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, educational history, or employment history. For the purposes of this policy, an image of one or more students or employees or both which is recorded by or on behalf of Quest with the intention that Quest will copy or otherwise reproduce the image for one or more of the purposes identified below will be treated as personal 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 including his/her name, position name or title, business telephone number, business address, business email address, or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated from time to time by the President of Quest to be responsible for ensuring that Quest complies with this Policy and PIPA.

1. Collecting Personal Information

1.1. Unless the purposes for which Quest collects personal information are obvious and the individual voluntarily provides his/her personal information for those purposes, Quest will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2. Quest will only collect personal information that is necessary to fulfill any one or more of the following and similar or related purposes:

- To verify identity;
- To send out information related to membership or prospective membership, whether as a student or an employee, in the academic community at Quest
- To assess an individual's suitability for admission or continued attendance at Quest including his/her academic ability and suitability for accommodation in a residence at Quest;
- To enrol a student or a prospective student in an academic, recreational, or social program offered by or through Quest;
- To assess an individual's suitability for employment or continued employment at Quest;
- To manage an employee of Quest;
- To identify and manage individual preferences;
- To understand an individual's financial needs;
- To open and manage an account;
- To deliver requested services and products;
- To provide or arrange for the provision of medical and other comparable services;
- To contact members of Quest's academic community and others for fundraising purposes;
- To ensure a high standard of service to members and prospective members of Quest's academic community;
- To meet regulatory requirements;
- To identify, collect, and process monies paid or payable to Quest including without limitation tuition, rent, and fees for student activities;
- To verify creditworthiness;
- To promote Quest generally as an academic institution or as an employer; and
- To promote Quest's educational, social, and athletic opportunities, activities, and achievements to its students, employees, and, as appropriate, the general public.

2. Consent

2.1. Quest will obtain an individual's consent to collect, use, or disclose his/her personal information except where, as noted below, Quest is authorized to do so without consent.

2.2. An individual may provide his/her consent orally, in writing, electronically, or through an authorized representative or it may be implied where the purpose for collecting, using, or disclosing an individual's personal information would be considered obvious and the affected individual voluntarily provides his/her personal information for that purpose.

2.3. An individual's consent may also be implied where an individual is given notice of an intended use of his/her personal information and a reasonable opportunity to opt-out of his/her personal information being so used but he/she does not opt-out.

2.4. Subject to certain exceptions, an individual may withhold or withdraw his/her consent for Quest to use his/her personal information in certain ways. An individual's decision to withhold or withdraw his/her consent to certain uses of personal information may restrict Quest's ability to provide a particular service or product. If so, Quest will explain the situation to assist the individual to make an informed decision about whether or not to withhold or withdraw his/her consent.

2.5. Quest may collect, use or disclose personal information without the individual's knowledge or consent in the limited circumstances set out in sections 12, 15, and 18 of PIPA, as amended from time to time. Some important examples of such circumstances include:

- 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; and
- To investigate allegations that an agreement has been breached or a law broken and, in cases of apparent urgency, to do so on an anticipatory basis.

3. Using and Disclosing Personal Information

3.1 Quest will only use or disclose an individual's personal information where such use or disclosure is necessary to fulfill the purposes identified at the time the personal information is collected or for a purpose reasonably related to those purposes.

3.2 Quest will not use or disclose an individual's personal information for any additional purpose unless Quest obtains his/her consent to do so.

4. Retaining Personal Information

4.1. If Quest uses an individual's personal information to make a decision that directly affects him/her, Quest will retain that personal information for at least one year from the date of the decision so that the individual has a reasonable opportunity to ask for access to the personal information.

4.2. Subject to section 4.1 above, Quest will retain an individual's personal information only for as long as is necessary to fulfill the purposes identified when Quest collected the personal information or for a legal or business purpose.

5. Ensuring the Accuracy of Personal Information

5.1. Quest will make reasonable efforts to ensure that an individual's personal information is accurate and complete when it may be used to make a decision about the individual or be disclosed to another organization.

5.2. An individual may request that a correction be made to his/her personal information in order to ensure that it is accurate and complete. An individual must make a request to correct personal information in writing and provide sufficient detail to identify the personal information and the correction being sought. An individual should send a request to correct personal information to Quest's Privacy Officer.

5.3. If the personal information is demonstrated to be inaccurate or incomplete, Quest will correct the personal information as required and send the corrected personal information to any organization to which Quest has disclosed the personal information in the previous year. If the correction is not made, Quest will note the individual's correction request in the relevant file and notify him/her that in its judgment the information held on file is accurate and complete.

6. Securing Personal Information

6.1. Quest is committed to ensuring the security of an individual's personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2. Quest will use appropriate security measures when collecting, storing, and destroying an individual's personal information.

6.3. At appropriate and regular intervals, Quest will review and update its security policies, measures, and controls to reflect technological changes and to ensure the continuing security of personal information.

7. Access to Personal Information

7.1. An individual has the right to access his/her personal information, subject to the limited exceptions contained in section 23 of PIPA, as amended from time to time.

7.2. A request to access personal information must be made in writing to Quest's Privacy Officer and provide sufficient detail to identify the personal information being sought.

7.3. Upon request, Quest will also tell an individual how Quest uses his/her personal information and, if applicable, to whom it has been disclosed.

7.4. Quest 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.

7.5. Quest may charge a minimal fee for providing access to personal information. Where a fee may apply, Quest will inform an individual of the cost and ask the individual whether or not he/she wishes to proceed with his/her request.

7.6. If an individual's request to access his/her personal information is refused in whole or in part, Quest will provide him/her with the reasons for the refusal in writing and describe the recourse available to the individual.

8. The Role of the Privacy Officer

8.1. The Privacy Officer is responsible for ensuring Quest's compliance with this policy and PIPA.

8.2. An individual should direct any complaints, concerns, or questions regarding Quest's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.

Current contact information for Quest's Privacy Officer will be found on Quest's website. of a Certificate at any time.