

**Privacy Policy**  
**Conrad Grebel University College**

Conrad Grebel University College is committed to protecting the privacy of the personal information of its students, alumni, employees, donors and other stakeholders. The College will recognize and maintain this trust by being transparent and accountable about how information is treated and shared.

During the course of both academic and residence programs, and through constituent or alumni activities, personal information is frequently gathered and used. This information is used primarily for communication from the College which takes a variety of forms such as mail, email, or phone. Anyone from whom such information is collected can expect that it will be carefully protected and that any use of this information is subject to consent. Conrad Grebel University College is an affiliated college of the University of Waterloo and as such operates in conjunction with the Privacy Guidelines of UW.

**Defining personal information**

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

Where an individual uses his or her home contact information as business contact information as well, that contact information is considered business contact information, and is not therefore subject to protection as personal information.

**Privacy practices**

Personal information gathered by College personnel and volunteers is kept confidential. Personnel are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. Measures are taken to prevent information that is centrally maintained from being lost or destroyed.

In order to protect the privacy of personal information, the College will:

- collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances
- routinely offer the opportunity to opt out of communication from the College
- give donors the option to remain anonymous in donor recognition lists
- use password protection for the donor database
- use password protection for the alumni database

- use password protection for the student records databases
- use password protection for the accounting software
- lock and secure the hard copy donor records
- lock and secure the hard copy financial records
- lock and secure the hard copy student and alumni records
- not trade or sell the mailing lists
- highlight the confidentiality of college records with volunteers who may have access to records as part of College volunteer work (eg Board Members or Alumni Executive members)
- update address changes when corrections are submitted and pass these to UW Records
- obtain consent when a third party asks for individual contact information
- maintain contact with the University Relations Privacy Legislation Working Group at the University of Waterloo
- adhere to the CGUC Guideline for Personnel Files (June 24/1999)
- adhere to UW Policy #19 regarding Access to and Release of Student Information

### **Updating of privacy policy**

The privacy practices will be regularly reviewed and updated when necessary, and posted on the College's website.

### **Contact Information**

Question, concerns or complaints relating to the Colleges's privacy policy or the treatment of personal information should be directed to the College's Director of Development who is the Chief Privacy Officer (CPO) and is responsible for privacy compliance issues. Staff and volunteers will be briefed by the CPO on issues relating to the College's Privacy Policy.

April, 2004