

# Policy on Privacy

**CATEGORY:** Student – Administrative

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**REVIEW REQUIREMENTS:** Every two (2) years

**APPROVED BY:** President

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## Policy Purpose

The College is committed to protecting the privacy of applicants' and students' personal information. This policy describes the College's practices for the collection, use, disclosure, retention, and protection of personal information in accordance with British Columbia's Personal Information Protection Act (PIPA).

## Scope

This policy applies to personal information about:

- individuals applying to the College; and
- individuals enrolled as students (including former students while records are retained).

Note: Employee personal information is governed under the College's employment/HR policies and applicable law.

## Definitions

**Personal information** means information about an identifiable individual (for example: name, contact details, student number, date of birth, grades, attendance, financial records, identity documents).

**Service provider** means a third party contracted by the College to provide services (for example: learning platforms, student information systems, IT support, payment processing).

## Policy

### 1. ACCOUNTABILITY AND PRIVACY CONTACT

The College designates a Privacy Officer (or Designate) who is responsible for the College's compliance with PIPA and for responding to privacy questions and requests. The College will make the Privacy Officer's title and contact information publicly available.

**Privacy Officer / Designate:** Jane Chang

**Email:** jchang@ashtoncollege.ca

**Phone:** 604-899-0803

**Mailing Address:** 459-409 Granville Street, Vancouver, BC V6C1T2

## 2. NOTICE AT COLLECTION

On or before collecting personal information directly from an applicant or student, the College will provide notice of:

- the purposes for collecting the information; and
- on request, the title and contact information of the Privacy Officer (or Designate).

## 3. COLLECTION AND USE OF PERSONAL INFORMATION

### 3.1. Limits

The College collects, uses, and discloses personal information only for purposes that a reasonable person would consider appropriate in the circumstances and only to the extent necessary to carry out those purposes.

### 3.2. Purposes (Applicants and Students)

The College collects and uses personal information for purposes including:

#### 3.2.1. Admissions

- to assess eligibility for admission and process applications;

#### 3.2.2. Enrollment and Education Delivery

- to enrol students in programs or courses;
- to deliver instruction and related educational services;

#### 3.2.3. Academic Administration

- to record and administer academic progress and results;
- to maintain student academic records and files in accordance with legal and regulatory requirements, including applicable private training requirements;

#### 3.2.4. Student Services and Communications

- to communicate with students regarding program requirements, schedules, and student services;

#### 3.2.5. Financial Administration

- to administer tuition and fee billing, payments, receipts, refunds, and financial records;

#### 3.2.6. Compliance, Safety, and Integrity

- to verify identity where required, administer assessments/examinations, and maintain academic integrity;
- to respond to emergencies or urgent situations affecting health or safety.

## 4. CONSENT AND WITHDRAWAL OF CONSENT

The College collects, uses, and discloses personal information with consent, unless otherwise permitted or required by law. Consent may be express or implied, depending on the circumstances.

An individual may withdraw consent where permitted by law. If consent is withdrawn, the College will explain any resulting limits on services or enrollment where the information is necessary to provide educational services or meet legal requirements.

## 5. DISCLOSURE TO THIRD PARTIES

The College does not sell applicants' or students' personal information.

### 5.1. Disclosures to Service Providers

The College may disclose personal information to service providers where necessary to operate the College and deliver services (for example, learning platforms, IT support, and payment processing). Service providers are required to protect personal information and use it only for providing contracted services.

### 5.2. Program Delivery (Including External Examinations)

The College may disclose limited personal information when necessary for program delivery or administration (for example: arranging external examinations or required third-party credentialing).

### 5.3. Legal Requirements

The College may disclose personal information where required or authorized by law, including in response to a court order or other lawful authority.

### 5.4. Emergencies

The College may disclose personal information where necessary to respond to an emergency that threatens an individual's life, health, or security.

### 5.5. Links to Third-Party Websites

The College website may contain hyperlinks to third-party websites. The College is not responsible for the privacy practices of third-party websites.

## 6. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

Applicants and students may request:

- access to their personal information under the College's control; and
- correction of an error or omission in their personal information.

### 6.1. How to Make a Request

Requests must be made in writing and provide enough detail for the College to identify the individual and the information requested. Identity verification may be required.

### 6.2. Time Limits

The College will respond within 30 days, unless an extension is permitted under PIPA (and the applicant is notified of the reason and the expected response date).

### 6.3. Fees

The College may charge a minimal fee for access requests where permitted by PIPA and will provide a written estimate in advance where required.

#### 6.4. Corrections

If a correction is made, the College will, where required, send corrected information to organizations to which the information was disclosed during the prior year. If the College does not make the requested correction, it will annotate the record with the requested correction.

### 7. PROTECTION AND SAFEGUARDS

The College protects personal information in its custody or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, or disposal.

### 8. RETENTION AND DISPOSAL

If the College uses personal information to make a decision that directly affects an individual, the College will retain that information for at least one year after using it.

Otherwise, the College will destroy documents containing personal information or de-identify the information as soon as it is reasonable to assume:

- the purpose for collection is no longer served by retention; and
- retention is no longer necessary for legal or business purposes.

### 9. COMPLAINTS PROCESS

The College maintains a process to receive, investigate, and respond to privacy complaints related to the handling of personal information.

Privacy complaints should be submitted to the Privacy Officer (or Designate) using the contact information in Section 1. The College will acknowledge the complaint, investigate, and respond in writing within a reasonable time.

## Policy Notes

This policy consolidates the measures included in, and replaces, the following archived policies of the College:

- Policy #1012 – Student Privacy Policy

**ACCOMPANYING POLICIES:** This policy is part of a suite of administrative-oriented policies under the Student Policies category.