

POLICY CHANGES 2023: SR1 (PRIVACY)

TO: Council
FROM: Governance Committee
October 2023

Update to add references to cookies, Google Drive, and Dropbox. Also to update the names of our Services.

Additions are indicated by ***bold italics***. Deletions are indicated by striking through (~~this~~).

Number & Title: SR1 - Privacy

Effective Date:
~~August 21, 2019~~ ***October 11, 2023***

Approval Date:
~~August 21, 2019~~ ***October 11, 2023***

Policy Type:
Internal Policy

Review Date:
This policy shall be reviewed every three (3) years.

Responsible Body:
Governance Committee

Designated Executives and Staff Members:
Privacy Officer, President

...

Types of Information Collected

- 1) We may collect, use, and disclose various types of personal information, but only for the purposes stated at the time of collection, such purposes to be reasonable ones relating to the operations, programs, and services of the AMS and its Subsidiaries. The types include:
 - a. ...

- g. Information provided to AMS services such as the Sexual Assault Support Centre, the AMS Ombudsperson's Office, the Advocacy Office, ~~Vice~~, Food Bank, Tutoring, and **Peer Support** ~~the Speakeasy, Entrepreneurship Hub~~.
- h. Demographic information.
- i. Information obtained via cookies on our websites.**

...

Safeguarding Personal Information:

- 22) We protect the personal information in our custody or control by making reasonable physical, organizational and electronic security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
- 23) We will take reasonable measures, through contractual or other reasonable means, to ensure that a comparable level of protection is implemented by the suppliers and agents who assist in providing services.
- 24) Note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication **or through non-AMS file-sharing services such as Google Drive and Dropbox. Staff shall not use such means for storing or sharing personal information. Instead, they should store personal information on AMS storage sites, on AMS local servers, or on AMS pre-approved vendors' sites.**

History:

This is ~~the first draft of a new policy replacing~~ **an update of the 2019 policy. That policy replaced** the old AMS Personal Information Protection Policy, which was created in 2004 and reviewed in 2007 and 2011.

Related Policies and Legislation:

The BC Personal Information Protection Act

(http://www.bclaws.ca/Recon/document/ID/freeside/00_03063_01).

Appendix 1: Consultations

The following groups and individuals were consulted during the development of **the 2019 version of** this policy:

The AMS lawyers, the AMS Privacy Officer, the AMS Managing Director, the AMS Senior Manager of Student Services, the AMS Ombudsperson, the Governance Committee, the VP Administration (2018-19).

In 2023, there was consultation with the Chief Technology Officer, the Senior HR Manager, the Privacy Officer, and the Governance Committee.