

## SAIT Insights Privacy Policy

### OVERVIEW

At the Southern Alberta Institute of Technology ("SAIT"), respecting privacy is an important part of our commitment to students and panel participants.

When you participate in a panel research survey conducted by SAIT, you can be confident that any personal information that you share with us will stay with us.

All collection of personal information shall satisfy the requirements of the Freedom of Information and Protection of Privacy Act (FOIP) specifically:

- a) All forms of collection will provide a notice to the individual of the purpose of collection in a form prescribed by the SAIT FOIP Coordinator.
- b) All information will be collected directly from the individual except as otherwise authorized by the Act.
- c) All records used to make a decision about an individual will be retained for as long as it remains necessary or relevant for the identified purposes or required by law.
- d) An individual may request that corrections be made to personal information about them held by SAIT.
- e) SAIT will take all reasonable precautions to protect personal information.

All uses and disclosure of personal information shall satisfy the requirements of the Freedom of Information and Protection of Privacy Act (FOIP) specifically:

- a) All use will be consistent with the stated purpose of collection.
- b) Disclosure shall be controlled and limited in accordance with the Act and SAIT will take all reasonable precautions to prevent unauthorized disclosure of personal information.

Any time you participate as a respondent in one of our panel surveys, you can be assured that your individual responses will be kept confidential and never linked to your personal identifying information without your express permission. You are free to choose whether or not to participate in a panel survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

The following Policy is a statement of principles and guidelines describing the level of protection of personal information provided by SAIT to respondents and the general public. The objective of this Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the Freedom of Information and Protection of Privacy Act (FOIP).

SAIT will continue to review this policy to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected at SAIT, please contact our Privacy Officer by e-mail at [Sheila.McCardle@SAIT.ca](mailto:Sheila.McCardle@SAIT.ca), or by mail at:

1301 – 16 Avenue NW  
Calgary, Alberta, T2M 0L4  
Attention: FOIP Coordinator

## **THE DETAILED SAIT INSIGHTS PRIVACY POLICY SCOPE AND APPLICATION**

The ten principles that form the basis of SAIT Insights Privacy Policy are interrelated and SAIT shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the Freedom of Information and Protection of Privacy Act (FOIP), the commentary in SAIT's Privacy Policy has been drafted to reflect personal information issues specific to SAIT Insights research panel.

The scope and application of SAIT Insights' Privacy Policy are as follows:

- SAIT Insights Privacy Policy applies to personal information collected, used, or disclosed by SAIT in the course of commercial activities.

- SAIT Insights Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.

- SAIT Insights Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by SAIT:

- (a) non-personally identifiable information;

- (b) the name, title, business address and/or telephone number of an employee of an organization;

- (c) other information about an individual that is publicly available and is specified by regulation pursuant to the Freedom of Information and Protection of Privacy Act (FOIP).

- The application of The SAIT Insights Privacy Policy is subject to the requirements and provisions of the Freedom of Information and Protection of Privacy Act (FOIP).

## DEFINITIONS

**collection:** The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of SAIT. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**disclosure:** Making personal information available to a third party.

**employee:** An employee of or independent contractor to SAIT.

**personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

**respondent:** A member of the public who provides personal information to SAIT in the course of participating in a panel survey conducted by SAIT. For example, a respondent is an individual who discloses personal information to SAIT in the course of quantitative or qualitative marketing or social research.

**third party:** An individual or organization outside of SAIT.

**use:** The treatment, handling, and management of personal information by and within SAIT or by a third party with the knowledge and approval of SAIT.

## **THE TEN PRINCIPLES OF SAIT INSIGHTS PRIVACY**

### **PRINCIPLE 1 – ACCOUNTABILITY**

SAIT is responsible for personal information under its control and shall designate one or more persons who are accountable for SAIT's compliance with the following principles.

Responsibility for compliance with the provisions of SAIT Insights Privacy Policy rests with SAIT's FOIP Coordinator.

Other individuals within SAIT may be delegated to act on behalf of the FOIP Coordinator or to take responsibility for the day-to-day collection and/or processing of personal information.

SAIT is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

### **PRINCIPLE 2 - IDENTIFYING PURPOSES FOR COLLECTION OF PERSONAL INFORMATION**

SAIT shall identify the purposes for which personal information is collected at or before the time the information is collected.

SAIT collects personal information in the market research panel from the public only for the following purposes:

- a) to conduct quantitative or qualitative marketing and social research;
- b) to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research; and
- c) to meet legal and regulatory requirements.

Further reference to "identified purposes" mean the purposes identified in this Principle.

SAIT shall specify orally, electronically or in writing the identified purposes to the respondent at or before the time personal information is collected in a survey. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within SAIT who can explain the purposes.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the respondent will be acquired before the information will be used or disclosed for the new purpose.

SAIT may provide clients or other third parties with information from any survey, in aggregate form. In aggregate form it is impossible to identify an individual respondent's personal information.

### **PRINCIPLE 3 - OBTAINING CONSENT FOR COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION**

The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Participation by respondents in panel research is always voluntary. When a respondent agrees to participate in a panel survey, he/she gives consent to the panel survey by participating.

Generally, any personal information collected in the course of a panel survey is not disclosed to third parties. In circumstances where SAIT does disclose information to a third party, SAIT always explains the reason for the disclosure to the respondent and obtains express permission from the respondent before making any such disclosure.

A respondent is always free to choose whether or not to participate in a panel survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

In obtaining consent, SAIT shall use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the respondent.

Generally, SAIT shall seek consent to use and disclose personal information at the same time it collects the information. However, SAIT may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, SAIT shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

The participation of a respondent in a quantitative or qualitative marketing or social research study may constitute implied consent for SAIT to collect, use and disclose personal information for the identified purposes.

#### **PRINCIPLE 4 - LIMITING COLLECTION OF PERSONAL INFORMATION**

SAIT shall limit the collection of personal information to that which is necessary for the purposes identified by SAIT. SAIT shall collect personal information by fair and lawful means.

In conducting surveys, SAIT limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

SAIT collects personal information about an individual primarily from that individual.

#### **PRINCIPLE 5 - LIMITING USE, DISCLOSURE, AND RETENTION OF PERSONAL INFORMATION**

SAIT shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

SAIT may disclose a respondent's personal information to:

- (a) a client of SAIT where the respondent has consented to such disclosure;
- (b) a third party engaged by SAIT to perform functions on its behalf;

(c) a third party or parties, where the respondent consents to such disclosure or disclosure is required or permitted by law.

Only SAIT's employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about respondents.

SAIT shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where a respondent may have to be

re-contacted for purposes of clarifying responses to a survey, or to seek additional responses, SAIT shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

SAIT shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

#### **PRINCIPLE 6 - ACCURACY OF PERSONAL INFORMATION**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by SAIT shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a respondent.

SAIT shall update personal information about respondents and employees as necessary to fulfill the identified purposes or upon notification by the individual.

#### **PRINCIPLE 7 - SECURITY SAFEGUARDS**

SAIT shall protect personal information by security safeguards appropriate to the sensitivity of the information.

SAIT shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

SAIT shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of SAIT's employees with access to personal information shall be required to respect the confidentiality of that information.

#### **PRINCIPLE 8 - OPENNESS CONCERNING POLICIES AND PROCEDURES**

SAIT shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

SAIT shall make information about its policies and procedures easy to understand, including:

- (a) the title and address of the person or persons accountable for SAIT's compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to personal information held by SAIT;
- (c) a description of the type of personal information held by SAIT, including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g. subsidiaries).

## **PRINCIPLE 9 - INDIVIDUAL ACCESS TO PERSONAL INFORMATION**

Upon request, SAIT shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request to the FOIP Coordinator, SAIT will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information.

In certain situations, SAIT may not be able to provide access to all the personal information that it holds about a respondent. For example, SAIT may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, SAIT may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a respondent may be required to provide sufficient identification information to permit SAIT to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

SAIT shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, SAIT shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Respondents can obtain information or seek access to their individual files by contacting SAIT's FOIP Coordinator.

## **PRINCIPLE 10 - CHALLENGING COMPLIANCE**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for SAIT's compliance with SAIT Insights Privacy Policy.

SAIT shall maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding SAIT's handling of personal information.

SAIT shall, on written request, inform its respondents about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with SAIT Insights Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

SAIT shall investigate all complaints concerning compliance with SAIT Insights Privacy Policy. If a complaint is found to be justified, SAIT shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The respondent shall be informed of the outcome of the investigation regarding his or her complaint.

## **ADDITIONAL INFORMATION**

For more information regarding SAIT's Insight's Privacy Policy, please contact SAIT's Marketing department by mail at:

SAIT Marketing  
1301 – 16 Avenue NW  
Calgary, Alberta, T2M 0L4  
Attention: SAIT Insights Privacy Policy



Please visit the FOIP website at: [www.servicealberta.ca/foip](http://www.servicealberta.ca/foip)