Policy Name: Policy on the Personal Information Protection and Electronic Documents Act, Canada (“PIPEDA”)

Originating/Responsible Department: University Secretariat

Approval Authority: Senior Management Committee

Date of Original Policy: May 24, 1995

Last Updated: November 2013

Mandatory Revision Date: November 2018

Contact: University Secretary

Policy:

[Note: This Policy replaces the policy known as “Access to Information and Privacy”, a policy under the approval authority of the Board of Governors and last updated in May 1995. That policy included an addendum relative to PIPEDA. The policy called “Access to Information and Protection of Privacy”, adopted by the University pursuant to its obligations under the Freedom of Information and Protection of Privacy Act of Ontario (“FIPPA”), is unaffected by this Policy and remains in full force and effect. See “Links to Related Policies” below.]

In connection with the University’s commercial activities (as defined in PIPEDA), the University recognizes that, in an era in which technology increasingly facilitates the circulation and exchange of information, rules are necessary to govern the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

The University will comply with PIPEDA in respect of personal information that it collects, uses or discloses in the course of its commercial activities (as defined in PIPEDA).

Pursuant to PIPEDA, “personal information” is information about an identifiable individual that includes any factual or subjective information, recorded or not, in any form. Personal information must be (i) collected with consent and for a reasonable purpose, (ii) used and disclosed for the limited purpose for which it was collected, (iii) accurate, and (iv) accessible for inspection and correction.

Purpose:

To ensure compliance by the University with relevant provisions of PIPEDA, to the extent applicable to the operations of the University.

Scope:

This policy applies exclusively to the operations of the University falling within the scope of PIPEDA. Other questions of freedom of information and protection of privacy at the University are addressed in policies of the
University related to FIPPA. See “Links to Related Policies” below.

**Procedures:**

With effect from 1 January 1 2004, certain commercial activities of the University are subject to the provisions of PIPEDA. PIPEDA requires that the University appoint a Privacy Officer responsible for overseeing compliance with PIPEDA. The University Secretary will serve as the Privacy Officer for the purposes of PIPEDA. Applications to the University under PIPEDA should be made to:

University Secretary, 607A Robertson Hall, Carleton University, 1125 Colonel By Drive, Ottawa ON K1S 5B6. Telephone 613.520.3811; fax 613.520.3731; e-mail governors@carleton.ca.

Oversight of the work of the University Secretary in ensuring compliance by the University with PIPEDA will be provided by the Freedom of Information and Protection of Privacy Compliance Committee, to which the University Secretary will make periodic reports in this respect.

**Contacts:**

University Secretary; Departmental Administrator, University Secretariat

**Links to related Policies:**

For general University policies related to freedom of information and protection of privacy, see the group of policies adopted by the University and related to FIPPA. These policies can be found at the following web address: [http://www2.carleton.ca/privacy/privacy-policies/](http://www2.carleton.ca/privacy/privacy-policies/)