

# ALBERTA STUDENT ASSESSMENT NETWORK

## Commonly known as the Alberta Assessment Consortium

### Privacy Policy

The Alberta Student Assessment Network (the “Society”) is committed to safeguarding the personal information entrusted to us by our clients. We manage your personal information in accordance with Alberta’s *Personal Information Protection Act* and any other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to the Society and its subsidiaries. The policy also applies to any person providing services on our behalf.

A copy of this policy is provided to any client on request.

#### What is personal information?

Personal information means information about an identifiable individual. This includes an individual’s name, home address and phone number, age, sex, an identifying number, financial information, educational history, etc.

#### What personal information do we collect?

We collect only the personal information that we need for the purposes of providing products and services to our clients, including personal information needed to:

- ❑ Deliver requested products and services to clients;
- ❑ Enroll a client in a Society program or conference;
- ❑ Send out program information by electronic mail, including notices of promotions and other updates about new conferences and programs offered by the Society;
- ❑ Contact clients about programs, transactions and/or services provided by the Society;
- ❑ Follow up with clients to determine satisfaction with products and services;
- ❑ Facilitate and moderate online forum discussions;
- ❑ Assist with customer service, trouble shooting, dispute resolution; and
- ❑ Use for internal statistical information.

We normally collect client’s information directly from our clients. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information.

However, we do not provide this notification when a client volunteers information for an obvious purpose (for example, when a client fills out a registration form on the Society website or signs a contact list at a conference).

### Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We will collect, use or disclose client personal information without consent only as authorized or required by law. For example, we may not request consent when the collection, use or disclosure is in an emergency that threatens life, health or safety.

### How do we use and disclose personal information?

We use and disclose client personal information only for the purposes for which the information was collected, except as authorized by law. For example, we collect and use your personal information to register you in conferences, to communicate services and transactions which are conducted on the Society website that you have requested, and to provide you with customer service. We also use your personal information to communicate with you. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We do not sell, rent, or lease our client list to third parties.

We may disclose personal information as permitted by law, including under the following circumstances:

- ❑ Where disclosure is required by law (for example, in response to a subpoena) or is authorized by law (for example, a request by a government agency pursuant to legislation);
- ❑ To report fraudulent activity or other deceptive practices to a governmental or law enforcement agency;
- ❑ To protect and defend our, and our suppliers', rights or property (including the enforcement of our agreements);
- ❑ To act in urgent circumstances to protect the personal safety of clients or the public; or
- ❑ To persons engaged in technical support of the Society's website.

### Web tracking and cookies

When you visit the Society's Website, we may collect information about your visit, including the pages you view, the links you click and other actions taken in connection with our solution. We also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring Web site addresses.

We may use "cookies" to enable you to sign in to our services and to help personalize your online experience. A cookie is a small text file that is placed on your hard disk by a Web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer.

We may use cookies to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your preferred configurations on your later visits to the site. If you are using a public computer you should delete any cookies after use.

### Use of service providers outside Canada

We contract with other companies to provide services on our behalf, such as credit card services. We only provide such information that is necessary to process payment for our programs and services. Credit card services are provided by Moneris Solutions and/or ePLY Services and their affiliates. These companies may store personal information outside of Canada. For further information, contact the individual listed at the end of this Policy.

### How do we safeguard personal information?

We take every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as unauthorized access to personal information. This includes the use of appropriate physical safeguards (including the use of a locked file cabinet in a locked office), appropriate technical safeguards (including the use of passwords for client information), and appropriate administrative safeguards (including ensuring that those with access to personal information have a need to access that information).

We will notify the office of the Information and Privacy Commissioner of Alberta without delay of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

We retain client personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

We render client personal information non-identifying, or destroy records containing personal information once the information is no longer needed.

We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records.

The password used to protect your accounts and personal information is your responsibility to keep confidential. Do not share this information with anyone. If you are sharing a computer with anyone you should always choose to log out before leaving a site or service to protect access to your information from subsequent users.

### Access to, or correction of, records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or control of the Society, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization.

In addition, you may request a correction of an error or omission in your personal information. We make every reasonable effort to ensure that our client information is accurate and complete. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the individual listed at the end of this Policy. You must provide sufficient information in your request to allow us to identify the information you are seeking.

We will respond to your request within the time period permitted under the *Personal Information Protection Act*. We may charge a reasonable fee to provide information but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

#### Changes to this privacy policy

We will occasionally update this privacy policy. You should review this privacy policy from time to time. When we post changes to this policy, we will revise the "Last Updated" date beside the link to this policy. This update will provide good and sufficient notice of the change to the policy and your continued use of the Society's website indicates your acceptance of the changes.

#### Questions or concerns

If you have a question or concern about any collection, use or disclosure of personal information by the Society or a request for access to your own personal information, please contact Sherry Bennett at 780-761-0530.

Last Updated – October, 2012