



FREEDOM COLLEGE of BUSINESS, HEALTHCARE AND TECHNOLOGY INC.

STATEMENT of POLICY and PROCEDURE	
PRIVACY and CONFIDENTIALITY POLICY With the Director's Approval	Updated October 18, 2019

POLICY

Freedom College of Business, Healthcare and Technology is collecting the personal information requested under the authority of and for activities authorized by the Ontario Colleges of Applied Arts and Technology Act, 2002.

This information will only be used by Freedom College of Business, Healthcare and Technology or its agents for the purposes specified and will not be sold or otherwise disclosed.

If you have any questions or concerns related to privacy, please contact the college at (416) 398-9231.

PURPOSE

The Privacy and Confidentiality Policy defines and describes the management of confidential information for all students and representatives of Freedom College of Business, Healthcare and Technology and how the college uses personal information. We believe that students' personal information is confidential, and every safeguard should be taken to ensure this information is kept confidential.

RESPONSIBILITY

1. Freedom College of Business, Healthcare and Technology is responsible for keeping all records in locked filing cabinets. All information relating to students will be left in locked drawers. This includes notebooks, copies of correspondence and all other sources of information.
2. Student are responsible for maintaining confidentiality for their placement/practicum organization or clients under The Personal Health Information Protection Act, (the Act) also known as PHIPA.

DEFINITION

1. ““Confidentiality” the obligation to keep personal information private and safe from access and use or disclosure by people who are not authorized to have that information.
2. “Personal information” means recorded information about an identifiable individual, including,



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- (a) information relating to the race, national or ethnic origin, color, religion, age, sex, sexual orientation or marital or family status of the individual,
 - (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
 - (c) any identifying number, symbol or other particular assigned to the individual,
 - (d) the address, telephone number, fingerprints or blood type of the individual,
 - (e) the personal opinions or views of the individual except where they relate to another individual,
 - (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
 - (g) the views or opinions of another individual about the individual, and
 - (h) the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual;
3. *“Signed informed consent”* in case of disclosure of information a person is made aware of the purpose for which information may be released and to whom; understand the outcome of giving or not giving written consent of release.
 4. *“Privacy”* means the right to determine when, how and to what extent their personal information is collected used and communicated to others

PROCEDURE

1. Freedom College of Business, Healthcare and Technology collects, uses and discloses student personal information with the student's knowledge and consent and only for purposes that we have identified prior to or at the time we collect the information. Some of the purposes for which Freedom College of Business, Healthcare and Technology may collect, use and disclose personal information are:
 - To facilitate communication with students
 - To grant you/enable students to access certain special features or areas of the college website
 - To process any of students' requests for information
 - To make available to students through the website certain services
 - To permit students to subscribe to an E-mail List to receive information
 - To administer participation in contests
 - To announce special events
2. Freedom College of Business, Healthcare and Technology will not sell, trade, lend or otherwise voluntarily disclose to any third parties any personal information that students



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have provided to us for any purpose not identified under this policy unless we have obtained the individuals 'prior consent.

3. A confidentiality agreement shall be signed by Freedom College of Business, Healthcare and Technology's staff before any access to confidential information can be granted during the course of business.
4. A confidentiality agreement must be signed by the authorized College representative before any access to confidential information can be granted to external consultants, a confidentiality agreement must be signed by the College administrator and the external consultants and/or their representatives.
5. Personal information must be and will be disclosed without consent when required by law or by court or officer of the court, when there are reasonable grounds to believe that the health and safety of an individual is at serious risk and if required by a public health officer or there are reasonable grounds to suspect abuse or neglect.
6. Third parties may provide services including but not limited to the provision of internet services, data management and storage, and a variety of other services. Personal information may be shared or gathered by these third parties, in the course of providing these services to Freedom College of Business, Healthcare and Technology, however these service providers must also adhere to this confidentiality policy and are prohibited to disclose any confidential information about Freedom College of Business, Healthcare and Technology' students and administration.
7. A student's safety must not be compromised through the inappropriate sharing of information. The college staff must have a clear and legitimate purpose for information sharing.

It is NOT acceptable for Freedom College of Business, Healthcare and Technology staff to do the following:

- Discuss issues of student confidentiality with colleagues who have no legitimate concern or interest.
 - Discuss issues of student confidentiality in inappropriate social settings and circumstances.
8. **Data Breach**
Any breach of this policy must be reported immediately to the Freedom College of Business, Healthcare and Technology, at (416) 398-9231, including misplacement of sensitive material (e.g. phone number list or any other list).