



Protection of Personal Information and Privacy Code

Vancouver Campuses – Students, Agents & Homestay Families

Scope:

This privacy code was developed for the protection of the Personal Information of the clients and associates of ILSC. This code outlines the principles we believe in when protecting the privacy of such individuals.

This code is based on the requirements of the British Columbia *Personal Information Protection Act* (PIPA), which came into effect on January 1, 2004 and the Canadian Standards Association's Model Code for the Protection of Personal Information which was incorporated into the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA).

Definitions:

"ILSC" means any of the ILSC Education Group operations including "ILSC Language School", "Greystone College" or "International Family Accommodation" operating in Vancouver, British Columbia.

"Client(s)" means any or all of Students, Agents, or Homestay Families

"Collection" means the act of gathering, acquiring or obtaining personal information from any source including third parties.

"Consent" means the voluntary agreement with what is being done or proposed. Consent may be either implied or express. Express consent may be given verbally or in writing and does not require any assumptions on the part of the recipient. Implied consent is based on the actions of the individual. For example, if a student fills out an ILSC form with personal information, then implied consent is given for ILSC to use this information for the purposes stated on the form.

"Personal Information" means information about an identifiable person in any form, excluding business contact information. Examples of personal information that ILSC may collect include (but are not limited to): Name, Address, email address, Age, Gender, medical information, and Homestay preferences.

"Third Party" means any individual or legal entity other than ILSC and the Client.

Section 1: Accountability

ILSC is committed to the protection of the personal information in its possession, which has been entrusted to it by Clients.

ILSC has developed and will continue to enhance policies and procedures designed to protect personal information.

ILSC is committed to ensuring that appropriate safety measures are in place whenever personal information is transmitted either physically or electronically.

The individual responsible for the protection of personal information and the application of this code is the ILSC Privacy Officer.

Section 2: Purpose for collecting personal information

ILSC collects personal information for the following reasons:

- To provide Educational and ancillary services including Homestay services to its students in keeping with their needs and the offerings of the institution.
- To meet regulatory requirements
- To be able to identify students
- To provide security for students and staff
- To provide services to agents

ILSC does not collect personal information for purposes of dissemination to third parties.

Section 3: Consent

ILSC will always obtain consent before collecting personal information. Consent may be implied as when a Client fills in an application form. ILSC does not disclose personal information to third parties without the express consent of the owner of the information.

A Client may withdraw consent to the collection or disclosure of personal information. Should consent to collection be withdrawn, the ability of ILSC to provide educational or other services may be affected. ILSC will advise the Client as to the consequences of withdrawal of consent.

Section 4: Limits for collecting personal information

ILSC will only collect the personal information that is reasonably required for it to provide educational and ancillary services.

ILSC may collect personal information about students from students themselves or from the Education Agents through which the student has registered at ILSC. If students do not wish their Agents to provide ILSC with their personal information, they must so advise their Agents directly.

Section 5: Limits for use, disclosure and keeping personal information

ILSC will only use personal information for the purposes for which it was collected. ILSC will not sell or otherwise disclose personal information or student lists to third parties. ILSC may provide Client information to affiliated schools or to unaffiliated schools to which a student is transferring.

According to law, ILSC must retain student personal information according to the requirements of the legislative or regulatory regime under which the school operates. ILSC Language schools are not regulated and personal information may be retained indefinitely but for no less than seven (7) years. Greystone must retain Student personal information for a minimum period of fifty-five (55) years according to PCTIA legislation. ILSC will retain Agent and Homestay family information for a period of seven (7) years following the date of last use.

Section 6: Accuracy

ILSC will use all reasonable efforts to ensure that any personal information used to make decisions about a Client is complete, accurate and up to date.

Section 7: Safeguards

ILSC will endeavor to ensure that any personal information kept is safeguarded against unauthorized access whether stored physically or electronically.

Section 8: Accessibility to policies and procedures

Any Client shall have access to the policies and procedures concerning the collection and use of personal information.

Questions may be addressed to:
The Privacy Officer
ILSC Vancouver
555 Richards Street
Vancouver, BC V6B 2Z5

Section 9: Access to personal information

Any Client may have access to their personal information by addressing a request in writing to the Privacy Officer at the address above. The requested information will be provided within a delay of 30 business days.

ILSC will disclose upon written request to the address above an explanation of how their information is being used.

If a Client makes a request in writing for access to his or her personal information, ILSC shall have the right to charge reasonable expenses incurred in complying with the request.

If after reviewing personal information following such a request, a student or employee wishes to correct erroneous information that request shall also be made in writing along with any documentation to support the correction sought.

If the information cannot be corrected as requested, then ILSC will provide an explanation in writing as to the reasons that the information cannot be corrected.

Section 10: Complaints

Students, agents and homestay families may direct any complaints concerning the implementation of this privacy code to:

The Privacy Officer
ILSC Vancouver
555 Richards Street
Vancouver, BC V6B 2Z5

All complaints received in writing will be investigated. All appropriate measures will be taken to address and resolve the complaint within a reasonable delay.

If the Privacy Officer cannot resolve the concerns of the complainant, the issue can be referred to the office of the President of ILSC. At any point in the process, the Client may also write to the Privacy Commissioner.