



MG
INTERNATIONAL
CAREER COLLEGE

Privacy Policy

V.1- May 2023

Purpose:

In order to uphold information privacy and access regulations, MG International Career College is dedicated to maintaining high standards of information protection and responsible record management. The college is committed to providing public access to records while fulfilling its legal obligations to safeguard the privacy of personal information under its care. This policy ensures that MG International Career College's practices align with privacy protection standards outlined in The Freedom of Information and Protection of Privacy Act, as well as other applicable legislation.

Scope:

This policy is applicable to all employees and faculty members of MG International Career College and the University of Guelph-MG International Career College, collectively referred to as "employees" in this document. It also extends to contractors, student workers, and individuals performing work for MG International Career College. The policy applies to all MG International Career College campuses and covers records or information that fall under MG International Career College's custody or control. This includes administrative and operational records generated as part of MG International Career College's regular business activities. Special attention must be given to records that contain personal or confidential information.

Definition:

Collection: means the act of gathering acquiring, recording, or obtaining Personal Information from any source and by any means.

Consent: means a voluntary agreement to a collection, use and/or disclosure of Personal Information for identified purposes.

Confidential Information: is information intended for limited distribution and not to be generally or publicly available, e.g. Human Resources records, personal health information, third party commercial information, solicitor client / legally privileged information, research or teaching materials, records in draft, development, un-approved or non-final state, non-public financial information, etc.

FIPPA: refers to the *Freedom of Information and Protection of Privacy Act (Ontario)*

Personal Information: is defined in FIPPA and refers to recorded information about an identifiable individual, including but not limited to:

- information relating to the race, nationality or ethnic origin, colour, religion, age, sex, sexual orientation, marital or family status of the individual
- 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
- any identifying number (e.g. student number), symbol or other particular number assigned to the individual
- the home address, or e-mail address, telephone number, fingerprints or blood type of the individual,
- personal opinions of, or about, an individual except where they relate to another individual,
- 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
- the views or opinions of another individual about the individual, and
- 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

Record: refers to any form of recorded information, regardless of its format, including but not limited to:

- Written materials such as correspondence, memos, books, plans, maps, drawings, diagrams, and any other textual or graphic works.
- Visual materials such as photographs, films, microfilms, sound recordings, and videotapes.
- Electronic records, including machine-readable formats, and any copies or drafts thereof.
- Records that can be generated from machine-readable sources through computer hardware, software, or other information storage equipment and technical expertise typically utilized by the institution.
- Records encompassing email communications, text messages, mobile phone records, as well as other relevant information from social media platforms or applications used for business purposes, including any additional or forwarded copies.

Student: A student is defined as an individual who has been admitted, enrolled, or registered for study at MG International Career College. This includes both current and

former students. Individuals who are actively engaged in a program but not enrolled in classes during a specific term, such as for vacation or leave, are still considered to maintain a continuing student relationship.

Third Party: Third Party refers to any person, group, or organization that is distinct from the individual to whom the information pertains. It excludes employees and faculty members of MG International Career College when they are acting in an official capacity, as they are not classified as third parties.

Privacy Breach: A privacy breach occurs when personal information of individuals such as students, alumni, faculty, staff, and private citizens is inappropriately or without authorization collected, used, disclosed, retained, or disposed of. This encompasses various parties involved in the breach.

Policy:

MG International Career College collects information for various purposes, including student admissions, registration, graduation, academic records, identity card issuance, and, when applicable, facilitating local transit passes. The information is also used to provide access to information technology systems and to operate various college programs such as academics, finance, athletics, recreation, residence, and alumni activities. Additionally, information related to admissions, registration, and academic achievement may be disclosed in the following circumstances:

(a) as part of the college's daily operations, (b) for statistical and research purposes by the college, (c) when necessary and appropriate to fulfill the college's functions, or (d) as required by law.

It should be noted that MG International Career College is obligated to disclose certain personal information, including Ontario Education Numbers, student characteristics, and educational outcomes, to the Minister of Training, Colleges, and Universities under the Private Career College Act, 2005.

Furthermore, under the federal Statistics Act, Statistics Canada has legal authority to access personal information held by educational institutions. However, the information obtained can only be used for statistical purposes, and the confidentiality provisions of the Statistics Act prevent the release of information that could identify individual students.

MG International Career College does not sell, rent, give away, or loan any personally identifiable information of students, alumni, faculty, staff, private citizens, or contractors associated with the college.

Any agents or contractors of MG International Career College who have access to personally identifiable information are required to handle such information in a manner consistent with the college's privacy policy. They are prohibited from using the information for any purpose other than carrying out the services they are engaged in for MG International Career College.

In situations where MG International Career College deems it necessary and in good faith, personal information may be released to (i) comply with the law, (ii) enforce the terms of user agreements, or (iii) protect the rights, property, or safety of MG International Career College, its users, or others.

Personal Information Collection:

Under the legal authority of the Private Career College Act, 2005, MG International Career College responsibly collects and maintains personal information of students, alumni, faculty, staff, and other relevant parties as an integral part of the services offered by the college. This information is utilized for legitimate purposes such as academic, administrative, employment-related, financial, statistical, and other appropriate functions pertaining to the College.

Retention and Disposal:

Personal Information will be retained for a period of one year from its last use, unless the mandates a longer retention period.

MG International Career College employees are responsible for taking reasonable measures to safeguard the security and confidentiality of Personal Information throughout its collection, storage, handling, and disposal.

When information is destroyed, MG International Career College employees will take appropriate steps to prevent its reconstruction or retrieval. Documentation of record destruction will be maintained for future reference.

Security and Security Measures:

To ensure privacy and confidentiality, robust security measures must be in place, encompassing technical, physical, and administrative safeguards. These measures are designed to protect information throughout its lifecycle, from creation or collection to disposal. Records, whether electronic or hard copy, containing Personal and other Confidential Information should not be taken from a secure institutional environment unless they can be kept secure. This can only be done with official authorization from the relevant Data Steward, based on operational necessity and when no other reasonable means exist to fulfill the task.

The College takes all necessary precautions to safeguard Personal Information and the systems used for its storage. This involves implementing organizational processes and capabilities that restrict access to Personal Information only to authorized individuals who require it to fulfill the purpose for which it was collected.

It is important to note that while each Department/Faculty creates, receives, uses, and maintains records related to the administration or operation of the College, these records are and remain the property of MG International Career College.

To ensure privacy and security, several measures are in place regarding computer use procedures, firewalls, physical security, and administrative protocols. These measures include:

- Computer use procedures such as implementing password restrictions, ensuring computers are shut off when not in use, encrypting files containing Personal Information, refraining from transporting Personal Information on USB drives, and avoiding emailing Personal Information.
- Firewalls, which serve as a barrier between internal networks and external networks to protect against unauthorized access and potential threats.
- Physical security measures, such as locking cabinets and offices, to prevent unauthorized access to physical records and equipment.
- Administrative protocols that control access to certain files, limit staff access to specific information, and promote the use of shared electronic files for collaborative purposes.

These measures collectively contribute to safeguarding privacy, maintaining security, and mitigating risks associated with handling Personal Information.

Privacy Breach and Notification Response:

In the event of any actual or potential privacy incidents, such as the unauthorized disclosure of personal information, it is essential to promptly report them to both the Manager and Director.

In response to a privacy breach, the following actions should be taken:

- Remove, relocate, or segregate any exposed information or files to prevent further unauthorized access.
- Temporarily shut down the affected website, application, or device to conduct a comprehensive assessment of the breach and minimize vulnerabilities.
- Make efforts to retrieve any wrongfully disclosed or taken documents and their copies.
- Conduct an inventory of the personal information that has been compromised or may have been compromised.
- Identify the individuals whose personal information has been wrongfully accessed, disclosed, stolen, or lost.
- Determine the institutional sector or third party responsible for the privacy breach.
- Document the entire process undertaken to identify and address the impact on affected individuals.

The following actions should be taken regarding the notification process in case of a privacy breach:

- Notify all individuals whose personal information has been or may have been compromised due to theft, loss, or unauthorized disclosure. This is done to protect them from potential harm, such as identity theft, and to mitigate any damage that may have occurred.

- Develop a process to safeguard sensitive personal data, including financial or medical information, and personal identifiers like the Social Insurance Number. This process should prioritize protecting individuals from further harm or potential repercussions that could negatively impact their career, reputation, financial standing, safety, health, or overall well-being.
- Exercise caution during the notification process to avoid causing undue alarm to individuals, particularly when the institution only suspects but cannot confirm whether certain individuals have been affected by the breach.
- Whenever possible, notify affected individuals through personal letter (preferably sent by first-class mail), telephone, or in-person communication. However, if individuals cannot be located or if the number of affected individuals is exceptionally large, alternative methods of notification may need to be considered to prevent an overwhelming administrative burden.

In case of a privacy breach, MG International Career College will also inform the Ministry.

Informing Affected Parties:

- A detailed description of the incident, including the date and time it occurred.
- Identification of the source responsible for the breach, whether it is the institution itself, a contracted party, or a party involved in a sharing agreement.
- A comprehensive list of the personal information that has been compromised or potentially compromised.
- Explanation of the actions taken or planned to retrieve the compromised information, contain the breach, and prevent future occurrences.
- The name and contact details of an official at MG International Career College who can address any further inquiries or provide assistance related to the breach.
- MG International Career College should periodically update the affected individuals on the progress of the investigation.

Information Collected through Website, Cookies and Third-Party Sites:

MG International Career College collects personal information to make our site(s) and service(s) more relevant and rewarding for you to use.

For each visitor to our Web pages, our Web server automatically recognizes your domain, service provider, operating system, and internet browser. Our Web server additionally records usage of pages by our visitors. We use this information, in aggregate, for our research reports and performance surveys. We sometimes use this identifiable information that we collect to improve the design and content of our site and to enable us to personalize your Internet experience.

Some of MG International Career College's pages request you to provide personally identifiable information in order to participate in the activities and promotional offerings. We may use the information you provide about yourself to fulfill your requests for our products, programs, and services, to respond to your inquiries about our

offerings, and to offer you other products, programs or services that we believe may be of interest to you. We sometimes use this information to communicate with you, such as to notify you when we make changes to our services, to fulfill a request by you, or to contact you about your account with us. Most of our communications provide an “opt-out” feature.

We may also use your information to update internal systems. This allows for seamless delivery of services and resources to you across MG International Career College.

The MG International Career College website(s) and service(s) may contain email services, bulletin board services, chat areas, news groups, forums, communities, personal web pages, calendars, photo displays and/or other message or communication facilities designed to enable you to communicate with others (collectively, “Communication Services”). The information we collect in connection with these Communication Services is used to provide an interactive experience. We use this information to facilitate participation in these Communication Services. Within many of these Communication Services, MG International Career College provides you multiple privacy options that allow you to restrict the use and viewability of your information to others.

A cookie is a data file stored on the hard drive of a website visitor, which helps us enhance their access to our site and recognize repeat visitors. By using a cookie to identify you, for example, you would not need to enter your password multiple times, thereby saving time during your visit. Cookies also allow us to track and tailor the interests of our users to enhance their experience on our site. It's important to note that the usage of a cookie does not involve any personally identifiable information on our site.

Third-party vendors, including Google, may use cookies to display ads based on a user's previous visits to the MG International Career College website. Users have the option to opt out of Google's use of cookies by visiting the Google advertising opt-out page.

Certain sections of our website(s) and service(s) feature links to external sites, and their information practices may differ from ours. Visitors are advised to review the privacy policies of these third-party sites, as we have no control over the information submitted to or collected by them.

Information Collection:

No individual shall collect personal information on behalf of the College unless the collection meets specific criteria:

- The collection must be expressly authorized by statute.
- It should be necessary for the proper administration of a lawfully authorized activity.
- The collection must be necessary for established College functions and operations essential to the educational mandate and activities of the College.
- The collection should align with MG International Career College's legitimate business purposes.

When collecting information, the College will strive to collect only the minimum amount of personal information required to fulfill the intended purpose.

The College must have legal authority to collect personal information, which can be established in the following ways:

- Collection is expressly authorized by statute (e.g., certain sections of the Labour Relations Act, Occupational Health and Safety Act, Statistics Act, MTCU Act, etc.).
- The information is to be used for law enforcement purposes.
- Collection is necessary for established College functions in accordance with applicable laws.
- Collection is necessary for the proper administration of a lawfully authorized activity or as otherwise permitted by FIPPA.

Personal information should be collected directly from the individual it pertains to, except in specific circumstances:

- When the individual authorizes another manner of collection.
- When the information is collected for the purpose of determining suitability for an honorary award.
- When the information is collected for law enforcement purposes.

The College has legal obligations to cooperate with law enforcement agencies when ensuring a safe environment for employees and students. Requests from the police regarding individuals associated with MG International Career College should be directed to the Chief Privacy Officer, who will assess the release of personal information in compliance with FIPPA.

When collecting personal information, a *Notice of Collection* is required. The Notice should include the legal authority for collection, the principal purpose(s) for using the information, the contact details of a College official who can address questions about the collection, and this information should be indicated on all forms and documents used for collecting personal information.

Personal information should only be used for the purpose for which it was collected or for a consistent purpose, unless required or permitted by law or with the individual's consent. A purpose is considered consistent if it is reasonably compatible with the purpose specified during collection or in the Notice of Collection. If personal information is to be used for a new purpose not previously identified, the individual's consent must be obtained beforehand. MG International Career College will not sell or rent personal information to any third-party organization or individual without prior consent or notice.

Records Management:

Records are valuable assets of the institution and should be managed effectively to enhance their usefulness in College operations. The College has the responsibility to safeguard and maintain records while ensuring their appropriate utilization throughout the College. MG International Career College staff are expected to:

- Generate records only when they are required for College business purposes.
- Safeguard official records that are crucial for College operations or serve as documentation of actions taken.
- Adhere to the retention requirements
- Delete transitory records, including rough notes, drafts, copies, and personal messages, that hold temporary or nonessential value.

Children Under 13

MG International Career College places great importance on the privacy of young children and is committed to not knowingly collecting any personal information from children under the age of 13. We encourage legal guardians to actively participate in and monitor their child's internet usage, including their access to our website, to ensure their privacy is effectively safeguarded.

Reference:

[Freedom of Information and Privacy Act \(Ontario\)](#)

[Humber College](#)

[Mohawk College](#)