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WEST COAST INSTITUTE

For Studies In Anthroposophy

PRIVACY POLICY

INTRODUCTION

The West Coast Institute for Studies in Anthroposophy (WCI) is a training institute that provides courses for individuals who wish to learn more about anthroposophy as expounded by Rudolf Steiner and others. The West Coast Institute for Studies in Anthroposophy was incorporated in 1998 under the British Columbia Society Act.

WCI is also a Developing Member of the Association of Waldorf Schools of North America (AWSNA).

WCI exists to provide related services to Clients. In compliance with the Personal Information Privacy Act of British Columbia, WCI has developed the following Privacy Policy.

DEFINITIONS

Anthroposophy

Anthroposophy is a science of the Spirit informed by the life and work of Rudolf Steiner. (1861-1925)

Client

Students, Instructors, Mentors, and WCI personnel who request WCI to perform a service.

Collection

The act of gathering, acquiring or obtaining personal information from any source, including Third Parties.

Consent

Voluntary agreement with what is being done or proposed. Consent can be either express or implied. **Express** Consent is given explicitly, in writing. **Implied** Consent is where WCI can reasonably infer Consent based on the action or inaction of the Client or Employee.

Contact Information

An individual's name, title, address, telephone number and email address.

Disclosure

The act of making personal information available to Third Parties.

Express Consent

Any action by an Individual or Organization that specifically authorizes personal information collection, use or disclosure.

Implied Consent

That which can be reasonably determined through the action or inaction of an individual or organization.

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Personal Information

Any information about an identifiable individual recorded in any form; including an individual's contact information.

Privacy Officer

The individual appointed from time to time by the organization who is accountable for WCI's compliance with the policies outlined herein.

Services

WCI's services include but are not limited to, the following: training programs, mentoring and follow-up, work experience, and location of interim housing.

Third Party

Any individual or organization other than WCI, the Client or the Employee.

Use

The treatment and handling of personal information by and within WCI.

PRINCIPLE 1: ACCOUNTABILITY

- 1.1 WCI will be accountable for all personal information under our control. Responsibility for compliance with this Privacy Policy rests with our appointed Privacy Officer, who has sufficient authority within our organization to ensure compliance. Complete confidentiality and security are not assured when using email or wireless communication.
- 1.2 WCI has developed procedures to protect personal information; train staff regarding this Privacy Policy; receive and respond to complaints and inquiries; and communicate the Privacy Policy to our Clients and Employees.
- 1.3 Should WCI personnel or a student transmit personal information through email or wireless communications, or request that WCI transmit personal information, WCISA will not be accountable for any incurred damages.
- 1.4 WCI will employ contractual or other reasonable means to ensure that our suppliers maintain a comparable level of personal information protection.

PRINCIPLE 2: IDENTIFYING PURPOSES

- 2.1 WCI will identify the purposes for which information is being collected, at or before the time of collection.
- 2.2 WCI collects personal information for the following reasons:
 - 2.2.1 To provide services to Clients, or
 - 2.2.3 To engage in an employee/employer relationship.
- 2.3 There may be situations where WCI is not required to explain purpose. These are described in Item 4.1.

PRINCIPLE 3: CONSENT

- 3.1 WCI will obtain student and WCI personnel consent for the collection, use and disclosure of their personal information, except where detailed in Item 3.4.
- 3.2 Consent can be express or implied. Consent may be obtained in person, or via telephone, fax, email or Internet.

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- 3.3 WCI personnel or a student may withdraw Consent at any time, upon providing a written request and subject to contractual restrictions. The Client/Employee will be informed that the withdrawal of Consent will affect our ability to continue to provide them with services or maintain the working relationship.
- 3.4 The requirement for Consent may be waived under these special circumstances:
 - 3.4.1 When the use is clearly in the interests of the individual and consent cannot be obtained in a timely manner, or
 - 3.4.2 Where certain information is publicly available, or
 - 3.4.3 For law enforcement and national security purposes, or
 - 3.4.4 To our corporate lawyer.

PRINCIPLE 4: LIMITING COLLECTION

- 4.1 WCI collects personal information for our defined purposes by fair and lawful means and does not deceive individuals about the purpose for which the information is collected.
- 4.2 No suppositions, interpretations or assumptions made by WCI personnel will form any part of the Client or Employee file.

PRINCIPLE 5: LIMITING USE, DISCLOSURE AND RETENTION

- 5.1 WCI will only use the information gathered for the purposes identified in our Privacy Policy.
- 5.2 WCI will not sell student lists or personal information to any Third Parties.
- 5.3 Personal information is retained indefinitely **after the Course Completion date?**
- 5.4.1 The retention period for Employee personal information is as required by law or by the Canada Customs and Revenue Agency, whichever is greater.

PRINCIPLE 6: ACCURACY

- 6.1 WCI will make every reasonable attempt to ensure student and WCI personnel personal information collected on behalf of the organization is accurate and up to date.
- 6.2 WCI personnel will confirm that the Client personal information on the Application for Admission Form is correct.

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- 6.3 Where WCI concurs that a correction to personal information is required, every effort will be made to correct our current records.

PRINCIPLE 7: SAFEGUARDS

- 7.1 WCI maintains appropriate security safeguards to protect personal information. Mentor and Instructor information concerning a student remains private and is only shared with the Program Director with the permission of these three people.
- 7.2 All WCI staff must sign a **Confidentiality Agreement** that affirms the individual's compliance with this Privacy Policy.
- 7.3 All subcontractors must provide a copy of their privacy policy upon request. Subcontractors may be required to submit a Supplier Compliance Form that affirms compliance with this Privacy Policy.
- 7.4 All electronic files are password protected. Paper files will be maintained in locked filing cabinets.
- 7.5 When personal information is no longer required to fulfill the purpose, WCI will dispose of this information in a safe and secure manner.

PRINCIPLE 8: OPENNESS

- 8.1 WCI will provide a Privacy Policy Leaflet that summarizes the WCI Privacy Policy. The contents of the Leaflet will also be available on the corporate website.
- 8.2 WCI will make the following information available:
- 8.2.1 The name, title and address of the person who is accountable for compliance with the WCI Privacy Policy,
 - 8.2.2 The means of gaining access to personal information in our custody,
 - 8.2.3 A description of the type of personal information in our care and how it is used, and
 - 8.2.4 A copy of our Privacy Policy.

PRINCIPLE 9: INDIVIDUAL ACCESS

- 9.1 An individual desiring access to personal information must submit a written request to our Privacy Officer.
- 9.2 WCI will, upon confirmation of identity, provide access to the personal information within 30 business days, unless we notify the individual that we require a longer period to respond.
- 9.3 Exception: WCI will not disclose personal information when the Privacy Officer determines that:

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- 9.3.1 The disclosure could reasonably be expected to endanger the safety of physical or mental health of individuals other than the individual who made the request, or
 - 9.3.2 The disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request, or
 - 9.3.3 The disclosure would reveal the identity of an individual who has provided information about another individual and the individual providing the personal information does not consent to disclosure of his/her identity.
- 9.4 Requests for access or correction to personal information must be accompanied by written application. The application must enable WCI to identify the individual and the personal information or correction being sought.
 - 9.5 WCI will make every reasonable effort to assist each applicant with the request and to respond to each applicant as accurately and completely as possible.
 - 9.6 Where access is refused, WCI will explain to the applicant the reasons for the refusal and will provide information on alternate recourses.
 - 9.7 WCI will not charge the applicant a fee for providing this information.

PRINCIPLE 10: CHALLENGING COMPLIANCE

- 10.1 To file a complaint about the WCI Privacy Policy, please write to:

Name: Elizabeth Wilby - President
Title: Privacy Officer
Company: West Coast Institute for Studies in Anthroposophy
Address: 2824 Wembley Drive, North Vancouver, B.C., V7J 3B6

- 10.2 Where the WCI Privacy Officer is unable to address the individual's concerns; the issue can be referred to the Privacy Commissioner of British Columbia. The contact information for the Information and Privacy Commissioner for BC is as follows:

Office of the Information and
Privacy Commissioner for British Columbia
P.O. Box 9038, Stn. Prov. Govt., Victoria, B.C. V8W 9A4
3rd Floor, 756 Fort Street, Victoria, BC V8W 9A4
Telephone: (250) 387-5629