



Procedures for Website Privacy

Link to Parent Policy:	Privacy Policy		
Procedure Reference:	PRPR04_2211N_AD/PRE		
Procedure Sponsor:	President		
Procedure Contact:	Privacy Officer		
Stakeholders:	All members of the OC Community including: Employees, Students, and the Board of Governors		
Approved by:	Executive Team		
Effective Date:	March 23, 2023		
Last reviewed:	December 2022	Scheduled review date:	December 2027

1. Purpose

Okanagan College ("College") is committed to maintaining the privacy and security of the personal information that it collects and uses from its staff, students and users of the College website.

This privacy procedure explains how the College uses and protects any information that visitors to the College website provide when they visit the website or subscribe to the products and services available through the website.

2. Scope & Responsibility

This procedure applies to all users and visitors to the Okanagan College website

3. Responsibility of the Head

The administration of this Procedure is the responsibility of the President, who is the "head" of the College for all purposes under FIPPA (the "**Head**"). The Head may delegate any of their powers under this Procedure or FIPPA to other College Personnel by written delegation.

4. Information Collected From all Website Users

4.1 When individuals browse and use the College website, the College automatically gathers and stores certain information about the visit for the purposes of administering the website, assessing system performance, improving web services and maintaining website security and management.

This information might include:

- a) Internet Protocol (IP) address
- b) Browser type
- c) Internet service provider
- d) How individuals use and browse the website

- e) The length of individual visits. However, the College's website logs are not personally identifiable, and we do not attempt to identify users from this information.
- 4.2 The College website logs do not identify individuals, and the College makes no attempt to identify individual users from the information collected. To the extent that any of this user information constitutes Personal Information it is collected under the authority of sections 26(c) and (e) of the *Freedom of Information and Protection of Privacy Act*.
- 4.3 Personal Information about users and other confidential information may also be collected through the website when individuals provide it to the College on a voluntary basis, such as when individuals submit questions or other inquiries, request services or ask to be added to a newsletter mailing list. In these cases, the College may use an individual's information in the following ways:
- a) To respond to user questions
 - b) To or respond to a complaint
 - c) For employment recruitment purposes
 - d) To inform individuals about the College programs or events
 - e) Or for other purposes permitted by law.

5. How the College Protects and Uses Personal Information Collected from the Website

- 5.1 The College will comply with applicable Canadian privacy laws, including the BC *Freedom of Information and Protection of Privacy Act*. The collection, use and disclosure of personal information as described above is in compliance with these and other applicable laws in Canada. The College employs organizational, technological and physical measures to protect the personal information collected.
- 5.2 The personal information collected through the website is used internally by the College and stored on servers based in Canada. In circumstances, where personal information is stored outside of Canada, the College will explicitly disclose this prior to any activity or interaction. The College may share some information with service providers to help maintain, improve or troubleshoot the website or to provide services to the College community.

6. Use of Cookies and Analytics

- 6.1 A cookie is a small file containing information that a website creates when a user visits a site. The cookie helps analyze web traffic. Cookies allow web applications to respond to website users as an individual. It can track how and when an individual visits a site, which site has been visited immediately before, and it can store that information. Cookies cannot be used to run programs or deliver viruses to an individual's computer.
- 6.2 There are two types of cookies, session cookies and persistent cookies. The College website may use session cookies which are stored in temporary memory and are not retained after a user signs out or closes the browser session.
- 6.3 Okanagan College utilizes cookies, web-analytics and similar tools to enhance user experience on this website and to evaluate and improve site performance. These tools may be used to record non-identifying information about a user's site visit. To the extent that any of the collected information is personal information, it is collected under the authority of section 26(c) and (e) of the *Freedom of Information and Protection of Privacy Act*. To learn more about the College's use of cookies and analytics please review the College's Privacy Policy.

7. Website Users Rights and Choices

- 7.1 The College does not sell or lease any personal information to third parties. Any personal information collected while an individual is using the College website will be used only as described in this Procedure Policy, unless otherwise required or permitted under applicable laws.
- 7.2 The College works hard to ensure that all collection, use and disclosure of Personal Information through the College website is fully compliant with FIPPA.
- 7.3 Under FIPPA, individuals have the right to request access to their Personal Information within the College's custody and control. Individuals also have the right to request correction of Personal Information and to be told how Personal Information is collected, used and disclosed by the College.
- 7.4 Complaints under this Procedure may be directed to the Privacy Officer at privacy@okanagan.bc.ca.

8. Contact Information

Questions or comments about this Policy may be addressed to the Privacy Officer at privacy@okanagan.bc.ca.

9. Related Acts and Regulations

College and Institute Act
Freedom of Information and Protection of Privacy Act (FIPPA)

10. Supporting References, Policies, Procedures and Forms

Privacy Policy
Procedures for Responding to Privacy Critical Incidents and Breaches
Procedures for Responding to Freedom of Information Access Requests
Procedures for Privacy Impact Assessments

History / Revisions

Date	Action
2022-11-09	New Procedure approved by OC Executive Team: <i>Website Privacy Procedures</i>