



**UNIVERSITY OF NEW BRUNSWICK**  
**STUDENT UNION**

## **Data Policy**

**University of New Brunswick Student Union**

Enacted: February 10, 2019

Revised: March 25, 2021

University of New Brunswick Student Union Incorporated  
**Data Policy**

**1. Mandate**

- 1.1 To define procedures regarding the collection, storage and use of personal information collected by **THE UNIVERSITY OF NEW BRUNSWICK STUDENT UNION**.

**2. Definitions**

- 2.1 **“Union”** or **“UNBSU”**: refers to the University of New Brunswick Student Union Inc.;
- “Council”**: refers to the Council of the University of New Brunswick Student Union;
- “UNB”**: refers to the University of New Brunswick;
- “Personal Information”**: refers to information that could identify an individual;
- “Digital Data”**: refers to personal information collected and/or stored digitally.
- “Regular Business Operations”**: refers to transactions moderated or facilitated by UNBSU for the benefit of UNBSU members, including, but not limited to, the sale of discounted transit passes, clothing sales, student legal aid services, and student health and dental plans.

**3. Scope**

- 3.1 This policy applies to all Personal Information collected and retained by the UNBSU or by any other entity operating on behalf of or under authorization from UNBSU.
- 3.2 For greater clarity, this includes the hard-copy database of users in the SafeRide service.
- 3.3 This policy does not apply to:  
3.3.1 Hiring data

#### **4. Collection and Use of Personal Information**

- 4.1 The UNBSU shall obtain consent from an individual before retaining any Personal Information about that individual.
- 4.2 Prior to obtaining consent, the UNBSU shall inform the individual of the scope of the information subject to that consent, and shall include a description of how the information will be used.
- 4.3 The UNBSU only collects personal information from its members and other persons for the purposes consented to during collection.
- 4.4 The UNBSU will only allow a person to collect or access Personal Information subject to this Data Policy if that person is also subject to UNBSU Code of Conduct.
- 4.5 The UNBSU makes no guarantee regarding the retention of any Personal Information and may destroy said Personal Information at any time, subject to any prior agreement between UNBSU and a particular individual.

#### **5. Protection of Personal Information**

- 5.1 The UNBSU will take necessary measures to protect the personal information provided by all persons; this includes ensuring both digital and hard-copy documents are adequately protected to prevent usage by an unauthorized person or organization during collection or storage.
- 5.2 The UNBSU may, from time to time, use a third-party service to collect, store, and/or process digital data.
  - 5.2.1 The UNBSU recognizes that once the Personal Information is in the possession of a third-party service it is subject to that service's data policies and procedures. The UNBSU shall ensure that any third-party services are generally considered reputable.
  - 5.2.2 In the case of a data breach of a third-party service, the UNBSU shall take all steps possible to protect the Personal Information stored therein, and shall inform all affected parties as soon as possible, and to the greatest possible extent.

## **6. Right to Withdraw Consent**

6.1 Any person may request that the UNBSU disclose whatever personal information the UNBSU has collected from them, and may also withdraw their consent to the UNBSU's possession and use of that information and may request for that information to be destroyed.

6.1.1 UNBSU reserves the right to retain Personal Information which has been collected pursuant to Regular Business Operations.

6.2 Upon written indication of any person revoking their consent to the UNBSU's possession of their personal information, the UNBSU will to the best of its abilities destroy that information.

## **7. Destruction of Records**

7.1 When destroying certain Personal Information, the UNBSU will follow commonly recognized business practices to render that Personal Information permanently inaccessible to the fullest extent possible.

7.1.1 With Personal Information stored in a physical form, the UNBSU will alter the physical form such that the Personal Information is unintelligible prior to disposing of it in the manner prescribed for that particular physical form, such as recycling.

7.1.2 With Digital Data, the UNBSU will delete all accessible records to the fullest extent possible.

7.2 With Digital Data stored with third-parties, the the UNBSU will follow all possible procedures provided by said third-party to remove the Digital Data, or otherwise render it permanently inaccessible.

7.3 The UNBSU reserves the ability to anonymize or aggregate any Personal Information, removing any personally identifiable descriptors from the data

## **8. Appeals and Enforcement of Policy**

8.1 A violation of this data policy may result in sanctions as specified in the UNBSU Code of Conduct.

- 8.2 Complaints regarding the collection, storage or use of Personal Information may be made to the Vice President Finance & Operations of the UNBSU.
- 8.3 Appeals from a decision of the Vice President Finance & Operations may be made to the UNBSU Appeals Board as specified in the UNBSU Bylaw No. 3.
  - 8.3.1 For greater clarity, the capacity and jurisdiction granted under Bylaw No. 3, Section 16 extends to an appeal of a decision of the UNBSU pursuant to this Data Policy.

### **Appendix A - Example Consent Agreement**

The information collected will be used for quality, training, and service improvement. We will destroy your data, or retain it in an anonymous aggregate format after it has been used for its intended purposes. We will abide by the UNBSU Data Policy in collecting, storing and processing any information subject to it.