1. PURPOSE AND SCOPE

College of the North Atlantic (the college) protects the privacy of its students, employees and others whose personal information is in the custody or under the control of the college. The college will identify, manage, and respond to all possible breaches of personal information.

This policy applies to all College of the North Atlantic employees, contractors, consultants, vendors or any other person retained under contract to perform services for the college.

2. POLICY

It is the policy of the College that:

- Employees are responsible for the protection of the privacy of students, employees and others whose personal information is in the custody or under the control of the college.

- Employees of the college will act in good faith and execute their employment responsibilities with a reasonable standard of care.

- Any employee suspecting a breach of privacy will immediately notify their supervisor, or the executive member of their respective division, and the college’s Access to Information and Protection of Privacy (ATIPP) Office.
• Noncompliance with the ATIPP Act, 2015 or this policy and related procedures will result in serious disciplinary action.

Any person who willfully (i.e. deliberately or intentionally) contravenes the ATIPP Act, 2015 may be subject to prosecution under section 115 of the ATIPP Act, 2015.

3. PROCEDURE

The Chief Operating Officer shall ensure that procedures are developed and implemented in accordance with this policy and in accordance with the Newfoundland and Labrador Access to Information and Protection of Privacy Act, 2015.

<table>
<thead>
<tr>
<th>Approval History</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved by President: April 19, 2012</td>
</tr>
<tr>
<td>Revision 1: April 28, 2016</td>
</tr>
<tr>
<td>Revision 2: November 4, 2016</td>
</tr>
</tbody>
</table>