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1. Purpose

This document describes Thompson Rivers University's procedures for safeguarding the privacy, information, and data of Small and Medium Enterprises (SMEs) and other external clients when providing advisory, consulting, or professional services.

2. Application

TRU faculty, staff and students follow these procedures when providing university-approved services, advice, or expertise to external clients, organizations, or entities as part of their official duties and responsibilities at TRU.

3. TRU's Commitment

TRU recognizes the importance of confidentiality and data protection for all external clients. Client information remains confidential and safeguarded through comprehensive technical, administrative, and physical measures that TRU has put in place and consistently enforces.

4. Data Protection Principles

4.1 Confidentiality

TRU's established practice is to:

- Classify all external client data as confidential by default
- Limit client information access to authorized personnel directly involved in the specific engagement
- Execute non-disclosure agreements before receiving confidential information

4.2 Data Security

TRU routinely implements:

- Secure, access-controlled systems for client data storage
- Encryption protocols for all data transmissions
- Regular security monitoring and vulnerability assessments

4.3 Privacy Compliance

TRU's standard approach includes:

- Collecting, using, disclosing, and retaining personal information (including client data) in accordance with Canadian law, including the BC *Freedom of Information and Protection of Privacy Act* (“FIPPA”)
 - Measures in place to protect personal information (including reasonable security arrangements required by FIPPA) are set out in sections 4.2, 5.1, 5.2, and 5.3.
- Obtaining client consent for any data use beyond the immediate service scope; and
- Following contractually agreed data retention schedules.

5. Data Handling Procedures

5.1 Collection and Use

TRU's practice is to:

- Collect client data only for the specific purpose of service delivery
- Limit data use to authorized personnel and the agreed service scope
- Require explicit written consent before using client data for internal research

5.2 Storage and Access

TRU maintains:

- Separate storage for client data from academic research data
- Role-based access controls limit data access to authorized individuals
- Access logs that are maintained and regularly reviewed

5.3 Retention and Disposal

TRU's approach includes:

- Retaining client data only as long as necessary for service delivery
- Following secure disposal procedures for data destruction
- Specifying retention schedules in client contracts

6. Incident Response

In the event of a suspected data breach involving client information:

- Immediate containment and assessment procedures are activated
- Affected clients are notified promptly
- Regulatory authorities are notified as required by law
- Corrective measures are implemented to prevent recurrence

7. Training and Awareness

TRU provides training to personnel involved in external client services covering:

- Confidentiality obligations and data handling procedures
- Security protocols and incident reporting

- Privacy legislation compliance requirements

8. Contract Requirements

TRU's practice for external client engagements includes:

- Clear data protection and confidentiality provisions
- Specified data retention and destruction terms
- Intellectual property and data ownership clauses
- TRU maintains appropriate professional liability insurance coverage for service delivery.

9. Oversight and Review

This document and procedures are reviewed biennially to ensure:

- Continued compliance with privacy legislation
- Alignment with industry best practices
- Effectiveness of data protection measures

10. Contact Information

For questions about this policy or to report data protection concerns:

Privacy and Access Specialist

Thompson Rivers University

Email: privacy@tru.ca

Phone: 778-694-2424

Office of the Vice-President Research

Thompson Rivers University

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Thompson Rivers University campuses are on the ancestral lands of the Tk'emlúps te Secwépemc (Kamloops campus) and the T'exelc (Williams Lake campus) within Secwepemcúlecw, the traditional and unceded territory of the Secwépemc. The region TRU serves also extends into the territories of the St'át'imc, Nlaka'pamux, Nuxalk, Tšilhqot'in, Dakelh, and Syilx peoples.