

DEVRY CANADA INC. PRIVACY POLICY

I. Overall Purpose of DeVry

DeVry is a private higher education system providing career-oriented, undergraduate and graduate degree programs in technology, business and management to high school graduates and working adults. DeVry provides access to these programs through its system of campuses, adult-learner sites and the online center to meet the needs of a diverse and geographically dispersed student population. Each member of the DeVry organization remains committed to providing high-quality curricula and student services (including, career services, alumni associations, housing, part-time employment assistance, bookstore, student resources centre, student activities and financial assistance). As a subsidiary of DeVry University, DeVry Canada offers educational programs at the DeVry Calgary campus and through the offsite DeVry University - Arizona instructional site located at the Calgary campus.

II. Accountability

Policy

DeVry Canada is committed to complying with relevant federal and provincial privacy and information protection legislation. DeVry Canada undertakes to ensure that personal information is collected, used, retained and disposed of in a manner that a reasonable person would consider appropriate in the circumstances. Furthermore, DeVry Canada is committed to the protection of all personal information held by DeVry Canada or transferred or disclosed to a third party for electronic storage or processing.

Procedures

- a) DeVry Canada will appoint and retain a Privacy Officer. The Privacy Officer reports directly to the President. The Privacy Officer is responsible and accountable for overseeing and providing guidance to ensure compliance with privacy and information protection legislation.
- b) Each department head is responsible and accountable for implementation and compliance with the privacy obligations, which may include:

- ensuring that procedures and practices are in place to protect personal information;
 - training and educating faculty, staff and students;
 - establishing and maintaining a Privacy Information reference manual that provides information on DeVry Canada policies, procedures and practices.
 - responding to individual requests for access or changes to their personal information and
 - responding and resolving complaints from individuals regarding the collection and use of personal information.
- c) The DeVry Privacy Officer maintains a continuous oversight and guidance role and coordinates a yearly review of overall institutional and departmental privacy compliance. In addition, the Privacy Officer conducts a privacy impact assessment when new processes are implemented that impact the flow of personal information within the organization. A privacy analysis follows the life cycle of personal information for its identified purpose from collection, use, retention, processing, disclosure and destruction of the personal information.

II. Identifying Purposes

Policy

It is the policy of DeVry Canada to identify the reasons for collecting personal information before or at the time of collection. Personal information does not include the name, title, business address or business telephone number of an employee of an organization. Personal information includes any factual or subjective information, recorded or not, about an identifiable individual such as age, name, identification numbers, income, ethnic origin, blood type, opinions, evaluations, comments, social status, disciplinary actions, employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, or intentions to acquire goods or services.

Procedures

- a) Any personal information collected from individuals fulfills the overall stated purposes of DeVry Canada. To assist in this determination further specifics respecting the identified purposes for which DeVry Canada collects, uses and discloses information is attached in “*Appendix I – Identified Purposes of DeVry Canada*”.
- b) The purpose(s) for which personal information is collected are identified at or before the time of collection. Individuals are advised why it is needed and how it will be used.

- c) Where appropriate, forms used to collect personal information include a statement of purpose.
- d) DeVry Canada may choose to identify purposes orally or in writing, whichever is practical to do at the time of collection.
- e) If the purpose for collection is identified orally, DeVry employees should place a note to file indicating that this has been done.
- f) Given the sensitive nature of personal information required during the financial aid application process, DeVry Canada identifies the purpose in writing before any personal information is collected.

III. Consent

Policy

It is the policy of DeVry Canada to obtain an individual's consent for or notify them of the collection, use and disclosure of their personal information as specified under privacy legislation. This consent or notification may be express or implied depending on the sensitivity of the personal information.

Procedures

General

- a) Consent to collect, use or disclose personal information is not a condition for the provision of services at DeVry Canada unless the information requested is required to fulfill an explicitly specified and legitimate purpose. For example, in order to be registered as a student, or be employed at DeVry Canada, personal information must be collected, disclosed and retained as per requirements under provincial and federal laws and for academic needs.
- b) Individuals may withdraw consent at any time. Requests must be made in writing to the Privacy Officer. The Privacy Officer is responsible for contacting the individual to advise regarding any consequences that may occur as a result of the withdrawal of consent, for example, DeVry's inability to provide the individual with a service. The individual will be advised of the legislative or administrative requirements for consent to be maintained for a certain period of time from the date of the initial consent.
- c) DeVry Canada will seek to obtain a new consent if a different purpose or use for the collection of personal information is identified. The Department Head will identify to the Privacy Officer the new purpose or use and the Privacy Officer will determine the nature of the consent required.

Types of Consent

- d) The type of consent received from an individual will depend on the reasonable expectations of the individual, circumstances surrounding the collection, and the sensitivity of the information being collected.

Express Consent

- e) Express consent is a specific authorization given by an individual, either orally or in writing, to use their personal information. Whenever possible, express consent should be obtained from the individual.
- f) Express consent provided orally will be documented to file.
- g) Express consent and/or notification will be obtained or provided during the following processes:

Process	Method of Authorization
Applicant Profile and Interest Evaluation Form	Individual will be requested to read and acknowledge the privacy statement when completing the form
Applicant Lead Tracking	Individual will be requested to read and acknowledge the privacy statement when completing the form.
New Student Application Process and Current Student Enrollment.	Applicant will be required to read and sign <i>Appendix II Student Consent to Personal Information</i> .
High School Evaluation	Individual will be requested to read and sign consent provisions when completing the form.
Student Finance Advisement and Application	Applicant will be required to read and sign <i>Appendix III Financial Aid – Notification of Disclosure and Consent for Exchange of Personal Information</i> .
Career Services Registration	Applicant will be required to read and sign <i>Appendix IV Career Services Consent to Personal Information</i> .
Employee Orientation	Applicants will be provided with and asked to acknowledge receipt of <i>Appendix V Notification of Personal Information and Privacy Form</i> . Employees will also be required to sign <i>Appendix VI Employee Confidentiality Agreement</i>
Internet inquiries	Individual will be asked to confirm use of personal information by clicking on icon or some other affirmative action.

Implied Consent

- h) Implied consent exists where no specific authorization has been obtained, yet the circumstances allow DeVry Canada to collect, use or disclose personal information. Implied consent typically refers to personal information voluntarily offered or provided by an individual in pursuit of information about DeVry Canada.

Exceptions to Consent

- i) The Privacy Officer (in consultation with the Department Head if available) will make a determination on exceptions to the consent requirement. For example, under privacy and information protection legislation, DeVry Canada may collect personal information without an individual's consent for a variety of reasons including:
- It is clearly in the individual's interests and consent is not available in a timely way.
 - If it is publicly available as specified in the regulations.
 - If knowledge and consent would compromise the availability or accuracy of the information and collection is required to investigate a breach of an agreement or contravention of a federal or provincial law.
 - For journalistic, artistic or literary purposes.
- ii) Where a reasonable person would consider the collection, use or disclosure of their personal information appropriate in certain circumstances than DeVry Canada may rely on notification to the individual of the purposes or alternatively rely on implied consent. For example, DeVry Canada requires personal information for the reasonable purposes of establishing, managing and ending an employment relationship.

IV. Limiting Collection

Policy

It is the policy of DeVry Canada to only collect personal information for specific legitimate educational and business purposes that fulfill DeVry's overall stated purposes. To assist in this determination further specifics respecting the identified purposes for which DeVry Canada collects, uses and discloses information is attached in "*Appendix I Identified Purposes of DeVry Canada*".

Procedures

- a) All employees will be provided with an orientation from the Department Head in consultation with the Privacy Officer regarding their responsibilities and requirements under privacy legislation. The Department Head will document

this on the new employee checklist by advising the payroll and benefits administrator upon the completion of the orientation.

- b) All new documents or methods for collecting personal information will be identified to the Privacy Officer who will review them to determine if the personal information being gathered is necessary for the identified purpose.

V. Limiting Use, Disclosure and Retention

Policy

It is the policy of DeVry Canada that personal information will not be used, disclosed or retained for purposes other than those for which it was collected, except by consent of or notification to the individual or as required by law.

Procedures

- a) Individuals will be advised and consent received if personal information is required to be disclosed to external agencies.
- b) Personal information will be retained as per requirements under provincial and federal laws. These include, but are not limited to requirements from the Province of Alberta or out of province licensing, reporting or accreditation authorities and for federal or provincial employment obligations or benefits such as for Revenue Canada, Workers Compensation, Alberta Health and Wellness, or third party benefit providers.
- c) DeVry Canada maintains pertinent information pursuant to its Document Retention Policy contained in DeVry's Academic Policy Manual – Appendix C. Personal information will be destroyed by shredding or by electronic information deletion, or by other methods appropriate to the degree of sensitivity of the information to ensure the information cannot be easily reconstructed by a third party.
- d) Under privacy and information protection legislation, DeVry Canada may use personal information without the individual's knowledge or consent under the following circumstances. The Privacy Officer or President (in consultation with the Department Head if available) will make the determination as to each situation:
 - If the use is clearly in the individual's interest and consent is not available in a timely way.
 - For an emergency that threatens an individual's life, health or security.
 - If it is publicly available as specified in regulations.
 - For statistical or scholarly study or research providing DeVry Canada notifies the Privacy Commissioner before using the information.

- If DeVry Canada has reasonable grounds to believe the information could be useful when investigating a contravention of a federal or provincial law and the information is used for that investigation.
 - If knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal or provincial law.
- e) Under privacy and information protection legislation, DeVry Canada may disclose personal information without an individual's knowledge or consent under the following circumstances. The Privacy Officer or President (in consultation with the Department Head if available) will make the determination as to each situation:
- In an emergency threatening an individual's life, health, or security.
 - If it is publicly available as specified in regulations.
 - To an archival institution.
 - If required by law, statute or regulation to a government institution consistent with its lawful authority under federal or provincial law.
 - To a lawyer representing DeVry.
 - To comply with a subpoena, a warrant or an order of the court or other bodies with appropriate jurisdiction.
 - To collect a debt the individual owes to DeVry.
 - For statistical, scholarly study or research provided DeVry Canada notifies the Privacy Commissioner prior to disclosing the information.

VI. Accuracy

Policy

DeVry's Canada policy is to collect and retain personal information as accurately as possible.

Procedures

- a) DeVry Canada will make reasonable efforts to ensure the accuracy and completeness of personal information.
- b) DeVry Canada audits existing and active student and employee data that is currently within its control and assesses archived data for either storage, destruction or if identified purposes still exist, for the use of the personal information. Through this process DeVry Canada determines the accuracy of the information and makes corrections where necessary.
- c) When dealing with individuals on ongoing matters or when completing forms for individuals, DeVry Canada employees will ask the individual to verify the accuracy of their personal information and make corrections where necessary.

VII. Safeguards

Policy

DeVry Canada is committed to safeguard all personal information from loss, theft, unauthorized use, disclosure, copying or modification regardless of the format in which it is held. In selecting appropriate safeguards DeVry Canada considers the sensitivity of the information, the amount of the information, the extent of distribution, the format of the information, the type of storage and the risk associated with its compromise or loss.

Procedures

- a) Access to all personal information (students and employees) available from an on-line system or from an off-line physical file is restricted to designated employees who require the information to perform their regular job duties.
- b) In cases where personal information is maintained on databases or physical files specific to the needs of a department, the Department Head is responsible for ensuring that appropriate levels of security are in place to limit access.
- c) All student and employee records containing personal information are secured at the end of each business day.

VIII. Openness

Policy

It is the policy of DeVry Canada to make available to individuals specific information relating to DeVry's Canada management of personal information under its control.

Procedures

- a) The web site includes a reference to DeVry's and DeVry Canada policies and practices relating to privacy protection.
- b) All employees are trained by the Privacy Officer and Department Head to respond appropriately to an individual's questions regarding the collection of their personal information.
- c) The Privacy Officer maintains a privacy reference manual that includes:
 - The relevant federal and provincial privacy and information protection legislation
 - These policies and procedures
 - A list of documents by department accountabilities that are used to collect personal information describing how it is collected, when it is collected, what it is used for, where it is kept and to whom it is disclosed..
 - Sample copies of consent statements for easy reference in case an individual requests an account of such information.
 - Processes for gaining access to one's personal information.
 - Complaint procedures.
 - Any privacy training materials.
 - A list of any frequently asked questions
 - The name and title of DeVry Canada's Privacy Officer

IX. Individual Access

Policy

It is the policy of DeVry Canada that upon request, an individual will be informed of the existence, use, and disclosure of his/her personal information that is under DeVry's control. An individual may be given access to, and challenge the accuracy and completeness of that information.

Procedures

- a) The Privacy Officer may make a determination that certain requests are of a routine nature and facilitate the processing of these requests directly by the individual employee or department involved in receiving such requests. Routine requests may be received verbally.
- b) All non-routine requests regarding the existence, use or access to an individual's personal information must be made in writing to the Privacy Officer. For all individuals who are not employees these forms are attached as *Appendix VII – General Personal Information Request/Challenge Form*. For DeVry employees these forms are attached as *Appendix VIII - Employee Personal Information Request/ Challenge Form*.
- c) If required, the Department Head or Privacy Officer will be responsible for assisting an individual in preparing a request.
- d) The Privacy Officer may request that an individual supply sufficient information to enable an account for the existence, use or disclosure of personal information.
- e) The Registrar's Office, in consultation with the Privacy Officer will be responsible for maintaining a record of all non-routine requests and responses to the requests. The Department Head for each department will be responsible for maintaining a record of all routine requests and the Privacy Officer will receive and maintain a summary of each department's general routine requests.
- f) Before providing access to personal information, employees must be satisfied as to the identity of the individual making the request and if necessary for verification purposes to require individuals to identify themselves using a photo identification.
- g) The Privacy Officer for non-routine requests and the employee for routine requests will respond to a request as quickly as possible as but not later than 30 days upon receipt of the request.
- h) The 30-day response period may be extended for no more than an additional 30 days under the following circumstances:
 - If responding to the request would unreasonably interfere with DeVry activities;
 - If additional time is required to conduct consultations; or
 - If additional time is required to convert personal information to an alternative format.The individual making the request will be informed of the extension of this time period.

- i) The following exceptions may prevent DeVry Canada from providing access and the Privacy Officer or President will make the determination as to their applicability:
 - If access may threaten someone's life or security;
 - If access may reveal personal information about another person;
 - If access may reveal confidential information regarding DeVry's activities;
 - If the information was collected without consent for the purposes related to an investigation or breach of an agreement or contravention of the law; or
 - If the information was generated during the course of a formal dispute resolution process.
- j) Reasonable costs may be applied to a request for personal information and if costs are applied, the individual will be notified of the approximate costs before processing the request.
- k) Should a request for access result in the need to correct personal information, DeVry Canada will facilitate the appropriate corrections and will also notify any third parties that have access to the information. The method of correction may result in both the original information and subsequent information being maintained on the file.
- l) The manner in which access will be given may vary depending on the format in which the information is held, the amount of information held and other factors.

X. Challenging Compliance

Policy

It is the policy of DeVry Canada to maintain a process whereby individuals may inquire or challenge the methods by which DeVry Canada handles personal information.

Procedures

- a) Inquiries or challenges about the manner in which DeVry Canada handles their personal information are to be submitted using the Challenge Form (*Appendix VII - General Personal Information Access/Challenge Form or Appendix VIII Employee Personal Information Access/Challenge form*). Forms are available in the Registrars office.
- b) All inquiries or challenges are to be directed to the Privacy Officer. The Privacy Officer will record the date of receipt, acknowledge receipt in a

prompt manner and assign an individual to conduct an investigation if necessary.

- c) The investigator will be impartial and selected based on their ability to understand the processes for collecting, using, disclosing and retaining the personal information.
- d) Inquiries/challenges will be conducted within a reasonable time.
- e) Individuals will be notified by the Privacy Officer of the outcome of the investigation and of any corrective action taken.
- f) DeVry Canada encourages individuals to use the internal processes of DeVry Canada first to resolve their inquiries or challenges. However, at any time an individual may make inquiries or complaints to the Federal Privacy Commissioner of Canada or to the Provincial Office of the Information and Privacy Commissioner of Alberta. These should be directed to:

Federal: The Privacy Commissioner of Canada
112 Kent Street, Ottawa, ON, K1A 1H3
Phone Toll-free: 1-800-282-1376
Web site: www.privcom.gc.ca E-mail: info@privcom.gc.ca

Provincial: The Office of the Information and Privacy Commissioner
Suite 500, 640 – 5th Avenue SW, Calgary, Alberta T2P 3G4
Toll Free: 1-888-878-4044
Phone:(403)297-2728
Web site: www.oipc.ab.ca E-mail: generalinfo@oipc.ab.ca

APPENDIX I IDENTIFIED PURPOSES OF DEVRY CANADA

Overall Purpose of DeVry

DeVry is a private higher education system providing career-oriented, undergraduate and graduate programs in technology, business and management to high school graduates and working adults. DeVry provides access to these programs through its system of campuses, adult-learner sites and the online center to meet the needs of a diverse and geographically dispersed student population. Each member of the DeVry organization remains committed to providing high-quality curricula and student services (including, career services, alumni associations, housing, part-time employment assistance, bookstore, student resources centre, student activities and financial assistance). DeVry Canada as a subsidiary of DeVry University offers educational programs at the DeVry Calgary campus and through its off site Phoenix instructional campus located at the Calgary campus.

Admissions Department

To be admitted to any DeVry program, a prospective student must interview with a DeVry admission representative and complete an application for admission. The fundamental job responsibilities of an admissions advisor are to handle enquiries about the programs offered at DeVry. Advisors make appointments with prospective students and interview them to ascertain which program they should be in and to evaluate their academic background, career and education goals, interest, desire, and motivation. Education advisors do presentations in high schools on career planning in which students have an opportunity to fill out a workshop comment card indicating if they wish to learn more about DeVry. In response to these comment cards, advisors are responsible for contacting the prospective students to get appointments and interviews. Interviews may be done either on campus or in the home of the prospective student.

Academics Department

The Academics Department focuses on teaching and learning, curriculum development, and academic administration. In addition, academic advising is provided as support to help students achieve their educational goals, while ensuring the academic standards of DeVry Canada are upheld. Within the parameters of current academic and faculty policies, administrators and faculty members provide information and advice to students to assist them in making academic decisions. Faculty members maintain and adhere to the confidentiality of all students, and retain student information including, but not limited to: contact numbers, personal information, term papers, etc., in a secure manner until the information is stored in the student's academic record in the Registrar's Office. Each student is responsible for seeking advice when needed, but it is expected that institute academic administrators and faculty will be proactive in initiating academic advising to support the steady improvement of student performance, satisfaction, and retention. Academic advising is provided in three academic contexts: preventing academic problems, helping to resolve academic problems that have arisen, administering the academic appeal provision of the Standards of Academic Progress policy.

Registrars Department

The purpose of the Registrar's Office is multi-faceted in that this area is accountable for an effective and efficient delivery of all functions related to admissions standards, academic scheduling, academic registration of new, continuing, resume and readmit students, academic records, student transfer coordination, attendance tracking, academic policy and procedures, and convocation.

Financial Assistance Department

DeVry Canada helps students develop financial plans to pay for their education through a combination of self-help, family contributions and student loans, grants and bursaries. DeVry's Financial Aid Office provides information on eligibility criteria and assists eligible students in applying for Canada Student Loans and provincial financial aid programs. Student loans and bursaries are available to those who qualify and are assessed, administered and awarded by the respective provincial authorities. Available loans and bursaries vary by province.

New Student Enrollment Services

DeVry Canada's new student staff works with new applicants and with the admissions department to assist students in making the transition to DeVry. This department provides guidance with housing, financial aid and administers placement examinations.

Career Services Department

DeVry Canada's career services professionals' work diligently to help graduates of day programs attain positions in their fields of specialization. Although DeVry Canada cannot guarantee employment, it provides career education that meets the needs of business and industry. DeVry Canada's career services are geared to the needs of students and their prospective employers. DeVry Canada supports students' career efforts with an employer database, company liaison, and industry experience program.

Systems Department

It is the responsibility of the systems department to provide service and support for all users of the computer and network infrastructure. Service and support includes user training, problem resolution, hardware and software repair and upgrade and implementation. Systems service and support ensures that DeVry Canada's curriculum and related applications work smoothly in delivering academic content while maintaining a leading edge perspective on innovations within technology.

STUDENTS COLLECTION USE AND DISCLOSURE OF PERSONAL INFORMATION SPECIFICS

Personal information collected from students may be used for the following purposes:

- To further inform potential students of new programs and reassess their interest in DeVry.
- To assess and meet entrance requirements.
- To register each term for continued studies.
- To verify identity, citizenship, landed immigration and/or international student status requiring a study permit in order to meet provincial and federal government requirements and admission policies.

- For academic assessment, progress and advising, including academic status such as language proficiency, grades achieved, credit granted, examination results, course work undertaken and the development of a customized plan of study.
- To develop additional support for students requiring academic assistance or personal assistance that may be conducive to improving academic achievement.
- To record disciplinary history.
- To review and assess any request for advanced standing, attendance appeals, academic appeals and exam deferrals.
- To set up email and technical accounts.
- To provide career service assistance.

Discussions about a student's eligibility or application for financial aid may require the collection of the following information from the student or from third parties:

- Basic information such as name, address, telephone number(s), and email address, birth date.
- Personal identifiers such as photo ID, social insurance number, driver's license or citizenship, landed immigrant or international student status requiring a study permit.
- Parent's or spouse's name and addresses.
- Financial status and history.
- Income and assets.
- Banking information.
- Previous financial history.

Personal information collected from a student or indirectly from a third party may be used for the following purposes:

- To determine eligibility or apply for provincial or federal student loans or other student loans.
- To assess credit eligibility of applicants.
- To assess credit eligibility of cosigners.
- To conduct credit and reference checks.
- To determine eligibility to reside in Canada and study at DeVry.

As a student at DeVry, your personal information will only be disclosed as follows:

- To DeVry's home office.
- To other DeVry locations for transfer purposes.
- To the province of Alberta or out of province licensing, reporting or accreditation authorities.
- To Student Loans Service Centre.
- To third party collection agencies in the event of default on student tuition payment.
- To Canada immigration, provincial or federal ministries and agencies as required by law.
- To internal and third party auditors authorized by DeVry or required by law for research, statistical analysis or to ensure integrity of files and processes.

APPENDIX II STUDENT CONSENT TO PERSONAL INFORMATION

I, _____ acknowledge that I have read the information set out on this form, and I hereby consent to DeVry's collection, use and disclosure of my personal information in the manner and for the purposes set out below. I know I may refuse to consent to the collection, use or disclosure of my personal information or withdraw a previously given consent. I acknowledge that a refusal to provide consent may result in the inability of DeVry to provide me with the administrative, academic, career or other student services I would otherwise have.

Personal Information

In order to apply for admission, register into an academic program or continue your studies at DeVry Canada, personal information will be required and collected from you or from third parties at various times. DeVry will only collect, use and disclose personal information in a manner that a reasonable person would consider appropriate in the circumstances.

Personal information collected from you or indirectly from a third party may be used:

- To assess and meet admission requirements.
- To register each term for continued studies.
- To verify identity, citizenship, landed immigrant and/or international student status requiring a study permit pursuant to provincial and federal government or agency requirements and admission policies.
- For academic assessment, progress and advising, including academic status such as language proficiency, grades achieved, credit granted, examination results, course work undertaken and the development of a customized plan of study.
- To develop additional support for students requiring academic assistance or personal assistance that may be conducive to improving academic achievement.
- To review, assess and record disciplinary and academic integrity matters and history.
- To review and assess any request for advanced standing, attendance appeals, academic appeals and exam deferrals.
- To set up email and technical accounts.
- To provide career service assistance.
- To assess and administer appropriate tuition payment arrangements.

The following information may be collected from you or from third parties:

- Basic information such as name, address, telephone number(s), and email address, birth date.
- Personal identifiers such as photo ID, social insurance number, driver's license or citizenship, landed immigrant or international student status requiring a study permit.
- Academic and/or employment history.
- Tests, exams and assignments.
- Academic status such as class cancellations, course changes and attendance.

- Medical information should you present this as good faith reason that has impacted your academic status.
- Methods of tuition payment including relevant financial institutions or loan administrative information.

As a student at DeVry Canada, your personal information will only be disclosed as follows:

- To employees within specified departments within DeVry to assist a department in fulfilling its intended purposes. (see Appendix I)
- To DeVry's home office
- To other DeVry locations for transfer purposes.
- To the province of Alberta or out of province licensing, reporting or accreditation authority purposes.
- To the Student Loans Service Centre.
- To third party collection agencies in the event of a default on student tuition payment.
- To Canada immigration, provincial or federal ministries and agencies as required by law.
- To internal and third party auditors authorized by DeVry or required by law for research, statistical analysis or to ensure integrity of files and processes.

Signature

Date

APPENDIX III - FINANCIAL AID NOTIFICATION OF DISCLOSURE AND CONSENT FOR EXCHANGE OF PERSONAL INFORMATION.

For DeVry to assist and facilitate a student's loan application process DeVry Canada requires your acknowledgement of these consent and disclosure provisions. If a student is a cash-paying student then your acknowledgement and consent to the collection, use and disclosure of the following information is for DeVry's internal purposes to ensure a student's financial ability to sustain their education. .

PURPOSE OF FINANCIAL ASSISTANCE DEPARTMENT

DeVry Canada helps students develop financial plans to pay for their education through a combination of self-help, family contributions and student loans, grants and bursaries. DeVry's Financial Aid Office provides information on eligibility criteria and assists eligible students in applying for Canada Student Loans, provincial financial aid programs and third party funding.. Student loans, bursaries and third party funding are available to those who qualify and are assessed administered and awarded by the respective authorities or organizations and may vary by jurisdiction.

PERSONAL INFORMATION

In order to discuss and/or verify eligibility or assist in your application for financial assistance, personal information will be required and collected from you for the benefit of third party loan providers. Student loan documentation administered by independent legislation, boards or organizations authorize the disclosure and exchange of personal information between the educational institute and the enrolled student. Student loan documentation requires full disclosure of personal information and places an obligation on a student to provide updated personal information that would have a material impact on the loan assistance amount. Often a failure to disclose or provide updated information will result in a denial of financial assistance from the specific loan provider. In these loan documents a student provides consent to the disclosure and exchange of their personal information or related documents by the educational institute with the loan provider for the purposes of verifying the information provided and to administer the student financial assistance. DeVry Canada encourages students to read the consent and disclosure requirements in the loan applications they have executed as differences may exist between federal or provincial government loans and/or third party private loan providers.

The commonalities between the various student loan applications respecting the collection, use and disclosure of a student's personal information are identified below.

Purposes for the collection of personal information may be used:

- To determine eligibility or apply for provincial or federal student loans.
- To determine eligibility or apply for other third party private student loans.
- To assess credit eligibility of applicants.
- To assess credit eligibility of cosigners.
- To conduct credit and reference checks.
- To determine eligibility to reside in Canada and study at DeVry Canada.

Personal Information that may be collected:

- Basic information such as name, address, telephone number(s), email address, birth date.
- Personal identifiers such as photo ID, social insurance number, driver's license or citizenship, landed immigrant or international student status requiring a study permit.
- Parent's or spouse's name and addresses.
- Family status.
- Financial status and history.
- Income and assets.
- Banking information.
- Previous financial history.
- Whether you have been accepted for enrollment or are currently enrolled and whether your enrollment is in good standing.
- Whether you have had a change from one program of study to another program of study.
- Whether you have interrupted your studies.

Disclosure of personal information may be made:

- To employees within specified departments within DeVry to assist a department in fulfilling its intended purposes. (*see Appendix I – Identified Purposes of DeVry Canada*)
- To DeVry's home office.
- To other DeVry locations for transfer purposes
- To the province of Alberta or for out of province licensing, reporting or accreditation authority purposes.
- To the Student Loans Service Centre.
- To third party collection agencies.
- To Canada immigration, provincial or federal ministries and agencies as required by law.
- To internal and third party auditors authorized by DeVry or required by law for research, statistical analysis or to ensure integrity of files and processes.

I acknowledge receipt of this notification of the collection, use and disclosure of my personal information by DeVry Canada and have read the information set out on this form. Where my consent would be required under privacy legislation I consent to DeVry Canada's collection, use and disclosure of my personal information in the manner and for the purposes set out herein and for the reasonable purposes associated with assisting in my financial aid. I acknowledge that a refusal to provide consent may result in an inability to provide me with financial assistance for my educational purposes.

Applicant Signature

Date

**APPENDIX IV
CAREER SERVICES –CONSENT TO PERSONAL INFORMATION**

I, _____ acknowledge that I have read the information set out on the Authorization to Release/Obtain Employment Information form the Career Services Registration folder, and I hereby consent to DeVry Canada's collection, use and disclosure of my personal information in the manner and for the purposes set out therein. I know I may refuse to consent to the collection, use or disclosure of my personal information or withdraw a previously given consent. I acknowledge that a refusal to provide consent may result in an inability to provide administrative, academic or career services; depending on the type of information I wish to withhold.

Signature: _____

Date: _____

APPENDIX V EMPLOYEE NOTIFICATION OF PERSONAL INFORMATION AND PRIVACY

Personal Information

In order to be hired and work at DeVry Canada, personal information will be required and collected from you or from third parties. DeVry Canada will collect, use and disclose this personal information as reasonably required for the purposes of establishing, managing and ending the employment relationship in accordance with privacy legislation and our privacy policy.

Collection:

At various times for the purposes of the employment relationship at DeVry Canada, the following information may be collected from you or from third parties:

- Basic information such as name, address, telephone number(s), email address, birth date and marital status.
- Personal identifiers such as photo ID, social insurance number, driver's license, citizenship or landed immigrant status.
- Educational and employment history with supporting third party documentation where necessary.
- Documentation on your performance.
- Medical information for bona-fide reasons related to absences or benefit eligibility.
- Beneficiary information applicable to designated DeVry plans.
- RRSP/DPSP DeVry investment options.
- Tax information for federal and provincial revenue purposes.
- Banking information for payroll deposits.

Purposes:

Personal information collected from you or from a third party may be used for the following purposes:

- To determine eligibility and apply for or assist in processing of DeVry's pension and benefit plans.
- To process and deposit your pay.
- To determine eligibility for hire, promotion, transfer or any other change in employment status.
- To assess and manage performance.
- To monitor and manage attendance.
- To conduct employment reference checks.
- To verify academic credentials.
- To indicate to the public the academic credentials of our employees.
- To conduct an investigation for purposes of a breach of the employment contract, for legal proceedings or as authorized by law.

Disclosure:

As an employee at DeVry, your personal information may be disclosed without further notification to you or further consent as follows:

1. Medical and benefit information retained by the Human Resources Department may be disclosed
 - To benefit carriers or for bona-fide reasons to an employees' supervisor for management purposes.

2. Other personal information may be disclosed:
 - To DeVry's home office.
 - To Statistics Canada, provincial or federal ministries and agencies as required by law.
 - To your supervisor or other authorized DeVry management with respect to establishing, managing and ending the employment relationship
 - To your supervisor or other authorized DeVry management with respect to performance and attendance history.
 - To benefit carriers to apply for or to determine eligibility.
 - To the general public in the form of employee academic credentials.
 - To internal and third party auditors authorized by DeVry or required by law for research, statistical analysis or to ensure integrity of files and processes.
 - To authorized persons for the purposes of an investigation for a breach of the employment contract, for legal proceedings or as authorized by law

I acknowledge receipt of this notification of the collection, use and disclosure of my personal information by DeVry Canada and have read the information set out on this form. Where my consent would be required under privacy legislation I consent to DeVry Canada's collection, use and disclosure of my personal information in the manner and for the purposes set out herein and for the reasonable purposes of establishing, managing and ending the employment relationship.

Employee Name

Employee Signature

Date

APPENDIX VI

CONFIDENTIALITY AGREEMENT

This Confidentiality Agreement (the “Agreement”) between DeVry Inc., together with its affiliates and subsidiaries, a body corporate having an office in the City of Calgary, in the Province of Alberta (the “Company”) and _____ (the “Employee”) provides as follows:

1. Mutual Benefits of Agreement

This Agreement is intended to benefit both the Company and the Employee. The Company wishes to enter into a working relationship with the Employee; however, because the Employee’s duties and responsibilities will bring the Employee into contact with the Company’s confidential information and client relationships, the Company must ensure that this valuable intellectual property is protected.

Likewise, the Employee wishes to be employed by the Company; however, because the Employee’s duties and responsibilities will bring the Employee into contact with the Company’s confidential information and client relationships, the Employee must ensure the Company that it can entrust the Employee with this valuable intellectual property.

2. Definition of “Confidential Information”

As used in this Agreement, “Confidential Information” means all information not publicly-available and not generally known or used by the Company’s competitors in the field of education, and which could be harmful to the Company if disclosed to persons outside of the Company. Confidential Information may take the form of documents, be stored or transmitted electronically, or exist in spoken words only; what matters is the information itself, not the way in which it is stored or conveyed. Confidential Information may also rise to the level of trade secrets (as defined by applicable laws).

In particular, Confidential Information includes, but is not limited to, the following types of information:

- (A) Instruction and curriculum information, such as: lesson plans, teaching strategies and techniques, classroom learning modules and related materials;
- (B) Client information, such as: lists and contact information of enrolled students and their families or other tuition sources, lists and contact information of potential students and their families or other tuition sources;
- (C) Products and services information, such as: details of the Company’s products or services, including those being developed or tested; strategic plans and performance capabilities, strengths, weaknesses and critical assessments;

- (D) Organizational information, such as: personnel and salary data; information concerning the Company's utilization of facilities, staff and other resources; and information relating to actual or potential mergers, acquisitions and expansions; and
- (E) Marketing and advertising information, such as: the Company's specific advertising programs and strategies utilized by the Company; and the success or lack of success of those programs and strategies.

3. Non-Disclosure

The Employee agrees as follows:

- (A) For the duration of the Employee's employment with the Company and after the Employee is no longer employed with the Company, the Employee will maintain in strict confidence -- including preventing disclosure to the public, competitors or other entities or individuals, and prohibiting any other use contrary to the interests of the Company -- all Confidential Information, to which the Employee is exposed, or which the Employee creates, as a result of fulfilling the Employee's duties and responsibilities for the Company;
- (B) With respect to Confidential Information which rises to the level of trade secrets under applicable law, the Employee's non-disclosure obligation will *not* expire, but will continue for such a period of time as the information remains a trade secret; and
- (C) Immediately upon the end of the Employee's employment with the Company, the Employee will return to the Company all materials, documents, computers and other equipment and other property belonging to the Company, including all Confidential Information which exists in tangible form in the Employee's possession.

4. Successors and Affiliates; Related Entities

This Agreement is enforceable by, and inures to the benefit of, the Company's successors and assigns. The Company's subsidiaries and affiliated entities (meaning entities in which the Company has an ownership stake and also operate in the field of early childhood education) have the same rights as the Company under this Agreement.

5. Completeness; Severability; Modification; Amendment

This Agreement is the complete and integrated expression of the parties' agreement on the subject matter, and supersedes any and all previous or other understandings, whether verbal or written, regarding the subject matter. Each provision of this Agreement is severable from the remainder of the Agreement. Further, if any provision of this Agreement is found to be overbroad or unenforceable, the court or other authority with competent jurisdiction is expressly authorized to conform the provision to the extent necessary to remedy any deficiency and render it valid and enforceable. No portion of this Agreement may be amended except in a form of writing signed by both parties or their representatives.

I have read and understood this Agreement,

EMPLOYEE:

DEVRY INSTITUTE OF TECHNOLOGY:

Employee's Signature

Company's Representative Signature

Employee's Name (Printed)

Company's Representative Name/Title (Printed)

Date

Date

**APPENDIX VII
GENERAL PERSONAL INFORMATION – REQUEST/CHALLENGE FORM**

(Note - Not required for routine request purposes as identified by the Department Head and approved by the Privacy Officer)

To: Privacy Officer – DeVry Canada

Student Name: _____

Address: _____

Telephone: (H) _____ (W) _____

Email: _____

Please indicate the preferred method of contact: _____

I wish to file a request to access my personal information or a challenge to my personal information that is being held or processed by DeVry electronically or by hard copy. Please state the nature of your request or challenge. Please give as much detail as possible for us to facilitate this request. A separate letter may be attached.

Signature

Date

FOR OFFICE USE ONLY	
Date Received _____	By _____
Date acknowledged _____	By _____
Date of Response _____	By _____
Resolved and Completed _____	(sign off by Privacy Officer)

**APPENDIX VIII
EMPLOYEE PERSONAL INFORMATION REQUEST/CHALLENGE FORM**

To Department Head: _____

Employee Name: _____

Department: _____

Employee Request:

I wish to file a request to access my personal information or a challenge to my personal information that is being held or processed by DeVry electronically or by hard copy. To assist in this request the following identifies the specific personal information I am requesting:

- Personnel File
- Payroll, Health Benefit and Pension Plan
- Accounts Payable and Expense file for contract employees purposes
- Supervisor's file

Signature Date

Department Head Response:

Approved _____
Signature Date

Human Resource Manager

- Approved
- Approved with exceptions (Provide request form to Privacy Officer)
- Not Approved (Provide request form to Privacy Officer)

Signature Date

FOR OFFICE ONLY		
File Accessed _____	Date: _____	By _____
File Accessed _____	Date: _____	By _____
File Accessed _____	Date: _____	By _____

Note: Personal Contact Information if other than DeVry: Address: _____

Telephone: (H) _____ (W) _____

Revision History

Date	Version Changed	Author/Policy Owner/Approver	Worksheet Edited	Description of Policy/Changes
03/2005	1.0	Calgary Privacy Officer	All	Initial load of policy
03/2008 & 09/2008	1.1	P. Duncan	All	Revisions and Review
01/2009	1.2	D. Spizzirri	Revision History	Added Revision History page