**Effective Date:** September 1, 2025
**Policy Owner:** Office of the Vice-President Research
**Review Date:** September 1, 2027

## 1. Purpose

This policy establishes Thompson Rivers University's commitment to protecting the privacy, information, and data of Small and Medium Enterprises (SMEs) and other external clients when TRU provides advisory, consulting, or professional services.

## 2. Scope

This policy applies to all TRU faculty, staff, and students involved in providing university-approved services, advice, or expertise to external clients, organizations, or entities as part of their official TRU duties and responsibilities.

## 3. Policy Statement

TRU is committed to maintaining the highest standards of confidentiality and data protection for all external clients. All client information is treated as confidential and is protected through comprehensive technical, administrative, and physical safeguards.

## 4. Data Protection Principles

### 4.1 Confidentiality

* All external client data is classified as confidential by default
* Client information is only accessible to authorized personnel directly involved in the specific engagement
* Non-disclosure agreements are executed prior to sharing confidential information

### 4.2 Data Security

* Client data is stored in secure, access-controlled systems
* All data transmissions utilize encryption protocols
* Regular security monitoring and vulnerability assessments are conducted

### 4.3 Privacy Compliance

* All activities comply with applicable privacy legislation, including PIPEDA and FOIPPA
* Client consent is obtained for any data use beyond the immediate service scope
* Data retention follows contractually agreed schedules

## 5. Data Handling Procedures

### 5.1 Collection and Use

* Client data is collected only for the specific purpose of service delivery
* Data use is limited to authorized personnel and the agreed service scope
* Client data is never used for internal research without explicit written consent

### 5.2 Storage and Access

* Client data is stored separately from academic research data
* Role-based access controls limit data access to authorized individuals
* Access logs are maintained and regularly reviewed

### 5.3 Retention and Disposal

* Client data is retained only as long as necessary for service delivery
* Data destruction follows secure disposal procedures
* Retention schedules are specified 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

All personnel involved in external client services receive training on:

* Confidentiality obligations and data handling procedures
* Security protocols and incident reporting
* Privacy legislation compliance requirements

## 8. Contract Requirements

All external client engagements include:

* 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 policy is 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 Officer**
Thompson Rivers University
Email: privacy@tru.ca
Phone: 778-471-8000

**Office of the Vice-President Research**
Thompson Rivers University
Email: research@tru.ca
Phone: 778-471-8444

*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 Secwepemcúl̓ecw, 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, Tŝilhqot'in, Dakelh, and Syilx peoples.*