

PRIVACY MANAGEMENT PROGRAM (PMP)

SECTION: Administration & Council

DEPARTMENT: Administration, Public Works, Finance, Community Services & Council

COUNCIL APPROVAL DATE: June 2, 2026

LAST REVIEWED BY COUNCIL: June 2, 2026

POLICY STATEMENT

The Town is committed to protecting personal information and transparency in governance through adherence to and compliance with Privacy Legislation.

PURPOSE

To provide guidance and direction regarding the Town's adherence to and compliance with Privacy Legislation through the Town's Privacy Management Program.

SCOPE

This policy applies to all Town Council and Employees who collect, access, use, disclose, or manage personal information, data derived from personal information, and non-personal data.

DEFINITIONS

"Council" means the elected officials of the Town of Bon Accord.

"Employee" means Town employees, and any person who performs a service for the Town as an appointee, volunteer, student, or under a contract or agency relationship with the Town.

"Privacy Legislation" means collectively: the Access to Information Act, Access to Information Act Regulation, Protection of Privacy Act, Protection of Privacy (Ministerial) Regulation, and Protection of Privacy Regulation, as amended from time to time.

"Privacy Management Program" means the Town's documented policies and procedures that promote its compliance with its duties under Privacy Legislation, as outlined in the Town's Privacy Management Program Procedures.

I. GENERAL PRINCIPLES

The following principles provide guidance and direction for the Town's management of Information:

1. Openness and Transparency

The Town develops and follows access, privacy, and security policies and procedures that are compliant with Privacy Legislation. With limited exceptions as provided for in Privacy Legislation, these will be publicly available on the Town's website.

2. Designation of Privacy Officer

The Town designates the role of Privacy Officer that is accountable for implementing and maintaining access to information and privacy for information under the custody or control of the Town.

3. Collection of Personal Information

The Town collects personal information only for authorized purposes and only to the extent that it relates directly to and is necessary for an operating program or activity of the Town. When collecting personal information directly from an individual, the Town must inform the individual as required by section 5 of the Protection of Privacy Act.

4. Correction of Personal Information

The Town makes all reasonable efforts to ensure that both general information and personal information created or received by the Town is accurate and complete. Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.

5. Use and Disclosure of Personal Information

The Town only uses and discloses personal information in accordance with the purpose for which it was collected, unless alternate use or disclosure is authorized or required by law, or with the knowledge and consent of the individual.

6. Compliance Challenges and Privacy Complaints

Individuals may bring forward any concerns or issues regarding privacy and access at the Town to the Privacy Officer. In certain situations, individuals may appeal to the Privacy Commissioner of Alberta to review or investigate access or correction responses provided by the Town, or any policies or practices the Town has in place that they believe do not comply with legislation.

7. Information Safeguards

The Town safeguards personal information under its control by implementing security measures to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction. If a privacy incident occurs, the Town will respond in a timely manner and in accordance with the Privacy Legislation.

8. Right of Access

The Town respects the right for individuals to access information, including personal information about themselves, that is under the custody or control of the Town and is subject to exceptions outlined in Privacy Legislation.

II. Quality Assurance

The Town takes the following measures to ensure quality assurance of the Town's Privacy Management Program and Privacy Legislation:

1. Periodic Policy Review

The Town will review the Privacy Management Program at least once every 3 years, following significant legislative or operational changes or at the discretion of the

Privacy Officer, to ensure that the Privacy Management Program is effective and maintains legislative requirements.

2. Training

The Town provides Employees and Council with mandatory training relative to their obligations under Privacy Legislation.

3. Privacy, Access, and Security Monitoring and Testing

The Town regularly monitors and tests its systems, practices, and repositories to identify and address potential risks relating to the privacy, accessibility, usability, integrity, retention, continuity, and security of Town information.

4. Privacy Impact Assessments

The Town completes privacy impact assessments for any systems, projects, programs, services, or practices that introduce significant new or expanded collection, use, disclosure, processing, or security exposure of personal information in accordance with Privacy Legislation.

III. Responsibilities

1. Council

Council is responsible for approving this Policy, adhering to Privacy Legislation, handling Town information responsibly, and supporting transparency in governance. This includes assisting in responding to information access requests when requested by the Chief Administrative Officer or the Privacy Officer and taking all required privacy training.

2. Chief Administrative Officer

The Chief Administrative Officer is designated as the head of the Town for the purposes of Privacy Legislation and may delegate to any person any power, duty, or function of the head under Privacy Legislation, except the power to delegate. The Chief Administrative Officer is responsible for ensuring the Town's compliance with Privacy Legislation and identifying the Privacy Officer for the Town.

3. Privacy Officer

The Privacy Officer is responsible for any powers, duties, and functions relative to the Privacy Management Program, as delegated by the Chief Administrative Officer, and oversees the implementation, maintenance, and ongoing monitoring of the Privacy Management Program and may delegate responsibilities as required.

4. Employees

Employees are responsible for participating in all required privacy training, reviewing and adhering to all relevant policies and procedures pursuant to the Privacy Management Program, and fulfilling any related duties.

In addition to Employee responsibilities, supervisors and managers must:

- Ensure Employees in their purview maintain compliance with the Privacy Management Program, and
- Make recommendations for Privacy Management Program amendments to the Privacy Officer as necessary.