

PERSONAL INFORMATION BANK (PIB)

SECTION: Administration

DEPARTMENT: Administration / Public Works / Finance / Community Services

COUNCIL APPROVAL DATE: October 18, 2022

LAST REVIEWED BY COUNCIL: July 7, 2026

POLICY STATEMENT

The Town of Bon Accord will develop and maintain a Personal Information Bank (PIB) and manage this information with the utmost responsibility and care.

PURPOSE

To govern the collection, use, and disclosure of all Personal Information of Individuals who interact with the Town, regardless of whether the information is held in paper, electronic, or digital form, in accordance with the Access to Information Act and Protection of Privacy Act.

SCOPE

This policy will pertain to all Individuals whose Personal Information is collected by the Town.

DEFINITIONS

“Consent” means a deliberate and free act of the mind; an act of reason accompanied by deliberation. Written or verbal Consent is required for the collection, use or disclosure of an Individual’s Personal Information in accordance with the Town’s Privacy Management Program Procedures, unless otherwise allowable by law.

“Privacy Officer” means the Individual delegated to the responsibility for the overall management of the Access to Information and Protection of Privacy functions for the Town.

“Individual” means a person who is single distinct human being and does not include other juristic persons such as incorporated organizations.

“Personal Information” means recorded information about an identifiable Individual, including, but not limited to:

- a) the Individual’s name, home or business address or home or business telephone number;
- b) the Individual’s race, national or ethnic origin, colour or religious or political beliefs or association;
- c) the Individual’s age, sex, marital status or family status;
- d) an identifying number, symbol or other particular assigned to the Individual;
- e) information about the Individual’s health and health care history, including information about a physical or mental disability;
- f) information about the Individual’s educational, financial, employment or criminal history, including criminal records where a pardon has been given;
- g) anyone else’s opinions about the Individual; and
- h) the Individual’s personal views or opinions, except if they are about someone else.

“Personal Information Bank (PIB)” means a collection of Personal Information that is organized or retrievable by the name of an Individual or by an identifying number, symbol or other particular assigned to an Individual.

“Town” means all departments which make up the Town of Bon Accord, as well as any Board, Commission or Committee established by Council.

BACKGROUND

The Town may gather Personal Information from Individuals to provide services, make decisions and support its operations, programs, and activities.

Section 57 of the Protection of Privacy Act requires all public bodies to have a directory of PIBs and make it available to the public. A PIB lists the type of Personal Information held by the Town which provides the following information:

- a) the title or name of department or Employee responsible for a PIB,
- b) the location of the PIB,
- c) what kind of Personal Information is contained in the PIB,
- d) what categories of Individuals the information pertains to,
- e) why the information is collected and how it is used or disclosed, and
- f) the legal authority for the collection of the information.

A PIB does not provide access to an Individual's records.

RESPONSIBILITIES

Chief Administrative Officer:

1. Delegate authority to manage the PIB in accordance with the Protection of Privacy Act.

Privacy Officer:

1. Manage the PIBs and ensure that an annual review of the PIBs is conducted and the directories updated as required.
2. Handle access to information application requests made to the Town.
3. Respond to privacy breaches.
4. Identify what information is held by the Town.
5. Identify what information is made available publicly, without making a formal access to information request.

GENERAL PRINCIPLES

1. The Personal Information described in PIBs has been used, is being used or is available for an administrative purpose.

2. The PIB describes how Personal Information is collected, used, disclosed, retained and/or disposed of in the administration of the Town's program or activity.
3. **Accountability:** The Town is responsible for Personal Information under its custody and control and shall designate an Individual or Individuals who are accountable for the Town's compliance with the Access to Information Act and Protection of Privacy Act.
4. **Identifying Purposes:** The purposes for which Personal Information is collected shall be identified by the Town at or before the time the information is collected.
5. **Consent:** The knowledge and Consent of the Individual are required for the collection, use or disclosure of Personal Information, unless authorized under the Access to Information Act, Protection of Privacy Act, or by law.
6. **Limiting Collection:** The collection of Personal Information shall be limited to that which is necessary for the purposes identified by the Town. Information shall be collected by fair and lawful means.
7. **Limiting Use, Disclosure, and Retention:** Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the Consent of the Individual or as required by law. Personal Information shall be retained only as long as necessary for fulfilment of those purposes.
8. **Accuracy:** Personal Information shall be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.
9. **Safeguards:** Personal Information shall be protected by security safeguards appropriate to the sensitivity of the information in accordance with the Town's Data Classification Policy.

10. **Openness:** The Town shall make specific information about its policies and practices relating to the management of Personal Information readily available to Individuals.
11. **Individual Access:** Upon request to the Privacy Officer, an Individual may be informed of the existence, use and disclosure of their Personal Information and may be given access to that information. An Individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
12. **Exceptions to Disclosure:** The Privacy Officer may refuse to disclose an Individual's Personal Information protected under Part 1, Division 2 of the Access to Information Act.