TOWN OF STONY PLAIN

A-LS-070

Protection of Privacy Policy

Authority: Chief Administrative Officer

Effective Date: November 2, 2026

Signature: _____

Future Review Date: 2030

Responsibility: Legislative Services

References: *Protection of Privacy Act, Access to Information Act*

Replaces: No prior policy

1.0 Purpose: To establish clear requirements for how the Town of Stony Plain collects, uses, discloses, stores, and safeguards Personal Information in accordance with the *Protection of Privacy Act.*

2.0 Scope: This policy applies to all Town of Stony Plain employees, volunteers, contractors, and service providers acting on behalf of the Town of Stony Plain.

3.0 Definitions:

Data Matching: Linking or comparing sets of Personal Information.

Office of the Information Privacy Commissioner or OIPC: means the independent oversight body responsible for ensuring that Alberta's public sector privacy and access-to-information laws are properly followed.

Personal Information: means the recorded information about an identifiable individual as defined in the *Protection of Privacy Act.*

Privacy-by-Design: means an approach mandated under the *Protection of Privacy Act* that requires public bodies to embed privacy protections into the design and operation of programs, services, systems, and business processes from their earliest stages and throughout their entire lifecycle.

Privacy Impact Assessment or PIA: means a structured, mandatory evaluation required under the *Protection of Privacy Act* to identify, analyze, and mitigate privacy risks arising from a public body's proposed or significantly modified program, service, system, project, or administrative practice that involves the collection, use, disclosure, or Data Matching of Personal Information.

Privacy Management Program: means a compilation of policies, procedures, safeguards, training programs and tools used to ensure compliance with the *Access to Information* Act and *Protection of Privacy Act.*

Privacy Officer: means the person the Town designates to oversee compliance with the *Protection of Privacy Act.*

***Protection of Privacy Act* or POPA**: means the Alberta legislation that governs how public bodies collect, use, disclose, retain, and safeguard personal information, and establishes individuals' rights of access and correction of their personal information.

Town: means the Town of Stony Plain.

Volunteer: means an individual who performs services for or on behalf of the Town without remuneration, under the Town's direction or control, including participation in Town programs, events, committees, or other activities.

4.0 Statement: The Town of Stony Plain is committed to protecting the privacy of individuals by collecting, using, disclosing, retaining, and safeguarding Personal Information in accordance with Alberta's *Protection of Privacy Act* and its regulations.

5.0 Standards:

5.1 The Town manages Personal Information in accordance with the requirements set out in the *Protection of Privacy Act.*

5.2 Personal information is only used and disclosed 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 subject individual.

5.3 The Town has adopted a Privacy-by-Design approach.

5.4 The Town has established a Privacy Management Program which includes documented policies, procedures, safeguards, and training, to promote compliance and foster a culture of privacy across the organization. This program will be maintained and regularly updated.

5.5 All programs, services, and projects that involve the collection, use, disclosure, or Data Matching of Personal Information will undergo a Privacy Impact Assessment when required by POPA. POPA restricts Data Matching that produces derived Personal Information, except in narrowly defined circumstances such as research or program planning.

5.6 Employees, Volunteers and contractors must ensure that Personal Information is collected only when authorized, is used solely for legitimate and defined purposes, and is protected with administrative, technical, and physical safeguards appropriate to its sensitivity.

5.7 The Town must ensure the accuracy and completeness of Personal Information and facilitate timely correction upon request.

5.8 In the event of a privacy breach, employees, Volunteers and contractors are required to immediately notify the Privacy Officer or the Information Management and Privacy Coordinator to ensure that affected individuals are informed without delay and that a report is submitted to the OIPC when the breach presents a real risk of significant harm.

5.9 Procedures may be established to outline principals and guidelines for managing potential or active privacy breaches.

6.0 Roles & Responsibilities

6.1 Privacy Officer

- 6.1.1 Ensure overall compliance with POPA and *Access to Information Act*.
- 6.1.2 Approve the Privacy Management Program, Privacy Impact Assessments, and major privacy related policies.
- 6.1.3 Cooperate with the OIPC.

6.2 Information Management and Privacy Coordinator

- 6.2.1 Develop and oversee the Privacy Management Program.
- 6.2.2 Facilitate the completion of Privacy Impact Assessments.
- 6.2.3 Lead breach responses and reporting to the OIPC.
- 6.2.4 Conduct periodic audits to ensure compliance.
- 6.2.5 Cooperate with the OIPC.

6.3 Employees, Volunteers, Contractors and Service Providers

- 6.3.1 Comply with all privacy legislation, policies, training and safeguards.
- 6.3.2 Report suspected or actual privacy breaches immediately.

7.0 Policy Review: This Administrative policy shall be reviewed within four years of being implemented, with any changes being submitted to the Chief Administrative Officer for approval.

Table of Appendices:

Appendix A Privacy Impact Assessment Template
Appendix B Privacy Breach Notification Form