



Protection of Privacy

PREPARED BY:	Legislative & Legal Services	COUNCIL APPROVAL DATE:	_____, 2026
EFFECTIVE DATE:	_____, 2026		
REFERENCES:	Protection of Privacy Act (POPA), Access to Information Act (ATIA)	PREVIOUS REVISION DATE:	New
FUNCTION:	Legislative and Legal Services	LLS REVIEW DATE:	May 4, 2026

PURPOSE

To support Parkland County's Privacy Management Program by establishing clear expectations for how Personal Information is handled and protected in accordance with the *Access to Information Act* and *Protection of Privacy Act* of Alberta. This policy will set the criteria in determining the severity level of a privacy breach and establish the rules for investigating, documenting and reporting privacy breaches. This policy establishes a framework for accountability, consistent decision making and risk management while supporting Parkland County's operational and service delivery needs. It also sets out high-level expectations for identifying, investigating, documenting and responding to privacy breaches, including determining the level of risk associated with a breach.

POLICY STATEMENT

Parkland County is committed to protecting the privacy and Personal Information of all individuals in accordance with the *Access to Information Act* and *Protection of Privacy Act*.

The Chief Administrative Officer (CAO), as the Head of the municipality under the *Access to Information Act* and *Protection of Privacy Act*, is accountable for ensuring compliance with all access and privacy legislation. While administrative authority for this policy and the Privacy Management Program is delegated to the Legal Services Coordinator, ultimate accountability remains with the CAO as required by the legislation.

Parkland County will maintain a comprehensive Privacy Management Program that establishes clear accountability for the Collection, Use, disclosure, retention and safeguarding of Personal Information under the County's custody or control.

Parkland County will implement reasonable administrative, technical, and physical safeguards to protect Personal Information against unauthorized access, use, disclosure or destruction. Privacy protection will be a key consideration in the design, implementation, and ongoing evaluation of all County programs, services, technologies and business processes.

In the event of a privacy breach, Parkland County will respond promptly to contain the breach, assess risk, mitigate potential harm and meet any notification requirements under the *Protection of Privacy Act*, as determined by the Legal Services Coordinator, in consultation with the CAO.

Through ongoing training, oversight and continuous improvement, Parkland County affirms its commitment to transparency, accountability and the responsible stewardship of Personal Information.

DEFINITIONS

The following definitions and interpretations apply in this policy:

1. "CAO" means the designated Chief Administrative Officer as defined in the Act or their delegate.
2. "Legal Services Coordinator" means the individual(s) responsible for managing access to information, protection of privacy and Privacy Management Program within Parkland County, as delegated by the CAO.
3. "Collection" means the gathering, acquisition, receiving or obtaining of Personal Information; whether that information is collected through interviews, questionnaires, surveys, polling, or by completing forms. Collection may include written, audio or video recording, electronic data entry or other such means.
4. "Elected official" means the Mayor and members of Council.
5. "Electronic record" means a record that exists at the time a request for access is made or that is routinely generated by a public body that can be any combination of texts, graphics, data, audio, pictorial or other information represented in a digital form that is created, maintained, archived, retrieved or distributed by a computer system.
6. "Employee" means a person who performs a service for Parkland County as an appointee, volunteer or student or under a contract or agency relationship with Parkland County.
7. "Personal Information" means recorded information about an identifiable individual (name, home or business address, home or business telephone number, home or business email address, or other contact information, the individual's race, national or ethnic origin, colour or religious or political beliefs or associations, the individual's age, gender identity, sex, sexual orientation, marital status or family status, an identifying number, symbol or other particular assigned to the individual, the individual's fingerprints, other biometric information, blood type, genetic information or inheritable characteristics, information about the individual's health and health care history, including information about the individual's physical or mental health, information about the individual's educational, financial, employment or criminal history, including criminal Records where a pardon has been given, anyone else's opinions about the individual, and the individual's personal views or opinions, except if they are about someone else).
8. "Privacy Impact Assessment (PIA)" means a due diligence assessment process conducted to determine how administrative practices and information systems relating to the Collection, Use or disclosure of Personal Information may affect the privacy of individuals. The PIA process anticipates potential privacy risks inherent in any service delivery including in-person, post mail, telecommunications and electronic services provided through technology.
9. "Privacy Management Program" means policies and procedures created and implemented that promote the County's compliance with its duties under the provisions of the *Protection of Privacy Act*, SA 2024, c P-28.5.
10. "Record" means information created or received in any form that provides evidence of business activity, and includes notes, images, audiovisual recordings, documents, maps, drawings, photographs, letters, and papers and any other information that is written, photographed, recorded or stored in any manner, but does not include transitory records, software or any mechanism that produces records.

11. "Use" means employing Personal Information in a file or database for example, to accomplish the County's purposes such as administering programs or activities, providing a service and determining eligibility of a benefit.

SCOPE

This policy applies to all Parkland County Employees, Elected officials, contractors or any person acting on behalf of the municipality who collect, Use or manage Personal Information in the custody or control of Parkland County. As such, all individuals are required to comply with this policy and the requirements within Parkland County's Privacy Management Program.

RESPONSIBILITIES

The Legal Services Coordinator is responsible for the implementation, administration, monitoring and evaluating of this policy and the Privacy Management Program (PMP), including the coordination of all reported privacy breaches and escalation to the CAO where required.

STANDARDS

1. Personal Information shall only be collected where authorized under the *Protection of Privacy Act* and where it is directly related to and necessary for an operating program or activity of Parkland County. Personal Information shall only be used or disclosed for the purpose for which it was collected or for a Use or disclosure authorized under the *Protection of Privacy Act*.
2. When a system or new process is developed or substantially changed that requires the Collection, Use or disclosure of Personal Information, a Privacy Impact Assessment (PIA) must be implemented to evaluate privacy risks and confirm that appropriate safeguards are built into the design.
3. Parkland County shall ensure that all new Employees complete mandatory privacy training as part of their onboarding. This training will provide foundational knowledge of the *Access to Information Act* and the *Protection of Privacy Act* and their responsibilities for protection Personal Information. Refresher training shall be provided to employees as required to maintain awareness of legislative obligations, policy updates and emerging privacy risks. All employees are expected to comply with the training standards as set out in the Privacy Management Program.
4. Elected officials must report a privacy breach or suspected privacy breach to the Chief Administrative Officer (CAO) as soon as it has been discovered.
5. Employees must report a privacy breach or suspected privacy breach to the Legal Services Coordinator as soon as it has been discovered.
6. The level of seriousness of a reported breach will be determined by the Legal Services Coordinator and shall be reported to the CAO, based on the following:
 - a. Low level breach- disclosure of basic Personal Information such as name and address of an individual.
 - b. Medium level breach- disclosure of sensitive Personal Information such as employment, legal, financial or minor health information of a single individual.

- c. High level breach- disclosure of comprehensive, detailed Personal Information such as bank account information, medical history, social insurance numbers and payroll Records about an individual or group of individuals
7. Parkland County will receive, review and investigate privacy complaints in accordance with applicable privacy requirements under the Privacy Management Program. Where appropriate, necessary and reasonable actions will be taken to address any issues identified. Anonymous complaints will be investigated; however, no follow up communication will be provided where contact information is not provided.
8. Parkland County will take reasonable steps to contain, investigate, document and respond to privacy breaches, including implementing corrective actions to prevent reoccurrence, in accordance with the Privacy Management Program.
9. All Personal Information in the custody and control of Parkland County shall be protected by reasonable administrative, technical, and physical safeguards.
10. Personal Information shall be retained and securely destroyed in accordance with Parkland County's Records Management Bylaw and, where Personal Information is used to make a decision directly affecting an individual, shall be retained for at least the minimum period required under the *Protection of Privacy Act*.
11. No Personal Information, Record or Electronic Record shall be altered, deleted, anonymized or destroyed where an access to information request, audit, investigation, legal proceeding, or election-related requirement is ongoing or reasonably anticipated.
12. Individuals have the right to request access to and correction of their Personal Information in accordance with *Access to Information Act* and *Protection of Privacy Act*.
13. Parkland County will promote a culture of privacy awareness, accountability and continuous improvement.