



COUNCIL POLICY

Privacy Management

Policy Title	Privacy Management		
Policy Number	507	Approved Date	2026/06/08
Department	Legislative & Executive Services	Last Amended	
Mayor Signature	"J. Clayton" (signed)	Last Reviewed	
		Signature Date	2026/06/09

1. Policy Statement

- 1.1. The City of Grande Prairie (City) is committed to protecting the privacy of individuals whose information is collected, used, disclosed or stored by the City by establishing a Privacy Management Program.

2. Purpose

The purpose of this Council policy (policy) is to:

- 2.1. establish the governance framework and define components for the City's Privacy Management Program;
- 2.2. promote consistent, secure and lawful handling of Individual-Related Data; and
- 2.3. ensure the City meets its legislated obligations.

3. Definitions

In this policy:

- 3.1. **"ATIA"** means the *Access to Information Act*, SA 2024, c A-1.4, including all regulations thereto, or any act or regulation that may be amended or substituted in its place.
- 3.2. **"Automated System"** means a system that contains Personal Information used by the City to inform decision-making.
- 3.3. **"City"** means the municipal corporation of The City of Grande Prairie, having authority under the *Municipal Government Act*, RSA 2000 C. M-26 and other applicable legislation. Where context requires, City also means the area included within the municipal boundaries of the City.
- 3.4. **"City Manager"** means the person appointed by the Council to the position of Chief Administrative Officer or their designate. For the purposes of Provincial Privacy Legislation, the City Manager is the Head of the organization.
- 3.5. **"Control"** means the City's authority related to the creation, use, distribution, retention or disposition of Individual-Related Data.



COUNCIL POLICY

Privacy Management

- 3.6. **"Consent"** means an individual's voluntary and informed agreement to the collection, use, or disclosure of their personal information, provided in a manner permitted (written, oral or electronic) under Provincial Privacy Legislation.
- 3.7. **"Custody"** means Individual-Related Data that is in the City's possession and may include Individual-Related Data that is supplied by a third party.
- 3.8. **"Derived Data"** means data created by Data Matching that identifies or presents a reasonable risk of identifying or reidentifying, an individual whose Personal Information was used in the Data Matching.
- 3.9. **"Data Matching"** means linking Personal Information between two or more databases or other electronic sources of information.
- 3.10. **"Employee"** means any person who performs a service for the City as an appointee, volunteer, student, or under a contract or agency relationship with the City as defined in POPA.
- 3.11. **"Individual-Related Data"** means Personal Information, Derived Data and Non-Personal Data collectively.
- 3.12. **"Non-Personal Data"** means data, including Derived Data, that has been generated, modified or anonymized so that it does not identify any individual.
- 3.13. **"POPA"** means the *Protection of Privacy Act*, SA 2024, c P-28.5, including all regulations thereto, or any act or regulation that may be amended or substituted in its place.
- 3.14. **"Personal Information"** means information about an identifiable individual as defined in POPA.
- 3.15. **"Personal Information Bank"** means a collection of Personal Information as defined in POPA.
- 3.16. **"Privacy Incident"** means actual or suspected loss, unauthorized access, or unauthorized disclosure of Personal Information.
- 3.17. **"Privacy Impact Assessment" (PIA)** means a documented assessment of privacy risks associated with a program, system or initiative.
- 3.18. **"Privacy Management Program"** means a privacy management program established and implemented pursuant to section 25 of POPA.
- 3.19. **"Privacy Officer"** means the office established under Section 5.5 of this policy.
- 3.20. **"Provincial Privacy Legislation"** means ATIA and POPA collectively.

4. Scope

- 4.1. This policy applies to all Individual-Related Data in the Custody and Control of the City.
- 4.2. This policy applies to any person who handles or has access to information set out in section 4.1.



COUNCIL POLICY

Privacy Management

5. General Principles

- 5.1. Without limiting the generality of the City's obligations under Provincial Privacy Legislation, the City acknowledges that the privacy and confidentiality of Individual-Related Data is important and commits to treating all Individual-Related Data with respect pursuant to Provincial Privacy Legislation.
- 5.2. The City will establish and maintain the following Privacy Management Program components. Where components are not yet fully developed, the City will implement the components in phases.
 - 5.2.1. Collection, Consent, and Notice
 - a. Collect only what is authorized by law and necessary to support the City's common or integrated operational programs, services or activities.
 - b. Obtain Consent of the individual (or the parent or legal guardian for any individual who is unable to provide Consent on their own), except where POPA permits or requires otherwise.
 - c. Provide clear and understandable notice at or before the time of collection as required by POPA.
 - d. Develop, maintain, and publish a directory that lists the City's Personal Information Banks.
 - 5.2.2. Use and Disclosure
 - a. Use and disclose Individual-Related Data only in circumstances permitted by Provincial Privacy Legislation.
 - b. Prohibit the sale of Personal Information in the custody and control of the City under any circumstances, including for marketing and advertising purposes.
 - 5.2.3. Access, Accuracy, and Correction of Personal Information
 - a. Take reasonable steps to ensure accuracy of Personal Information in the Custody and Control of the City.
 - b. Allow individuals to request access to Personal Information or a correction to Personal Information.
 - c. Manage requests for access to information in accordance with Provincial Privacy Legislation and established policies and procedures.
 - 5.2.4. Retention and Disposition of Individual-Related Data
 - a. Retain and dispose of Individual-Related Data in accordance with established records management procedures and Provincial Privacy Legislation.
 - 5.2.5. Protection of Personal Information
 - a. Establish security measures to safeguard Personal Information from unauthorized access, collection, use, disclosure, alteration or destruction through administrative,



COUNCIL POLICY

Privacy Management

physical and technical controls, including a classification system based on sensitivity and risk.

- 5.2.6.** Third Parties and Contracts
 - a.** Require contracts entered into by the City that may involve the collection, use, or disclosure of Personal Information in the performance of the contract, include a requirement for reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.
- 5.2.7.** Privacy Impact Assessments
 - a.** Conduct Privacy Impact Assessments with a level of detail commensurate with the complexity for new or significantly modified practices, programs, projects or services that will involve the collection, use or disclosure of Personal Information.
- 5.2.8.** Privacy Incident Response
 - a.** Maintain a Privacy Incident Response Procedure that describes the roles and responsibilities for managing actual or suspected privacy incidents.
- 5.2.9.** Automated System Transparency
 - a.** Provide the required notice to individuals and ensure human oversight if an Automated System uses Personal Information.
- 5.2.10.** Derived Data, Non-Personal Data, and Data Matching
 - a.** Manage Derived Data in a manner consistent with the original authority, purpose and privacy requirements associated with the Personal Information from which it was derived and is treated as Personal Information where there is a reasonable possibility of identification or re-identification.
 - b.** Manage and govern Non-Personal Data in a manner that prevents identification or re-identification of individuals, including through the application of reasonable technical, administrative and contractual controls, particularly where data is combined with other datasets or shared internally or externally.
 - c.** Undertake Data Matching and the use of Non-Personal Data only where legally authorized, necessary and proportionate, with scope limited to relevant data elements and reasonable measures in place to prevent the identification or re-identification of individuals, including when data is combined with other datasets or shared internally or externally.
- 5.2.11.** Compliance Challenges and Privacy Complaints
 - a.** Encourage individuals to bring forward to the City any concerns or issues regarding privacy and access.
- 5.2.12.** Training and Awareness
 - a.** Ensure that all individuals identified in section 4.2 receive access and privacy training as applicable to their role.



COUNCIL POLICY

Privacy Management

- 5.3. Components of the Privacy Management Program will be reviewed not less frequently than once per Council term to ensure compliance and risk mitigation.
- 5.4. A public-facing summary of components of the Privacy Management Program will be published on the City's website and updated as components are established or amended, as required by POPA.
- 5.5. The position of Privacy Officer is hereby established. The Privacy Officer shall have such powers, duties and functions related to Provincial Privacy Legislation as may be delegated to the Privacy Officer by the City Manager, or by any procedure of this policy.

6. Responsibilities

- 6.1. City Council will review and approve any revisions to this policy.
- 6.2. The City Manager will review and approve any procedures related to this policy.
- 6.3. Employees will comply with this policy and its procedures.

7. Legislative Authority & Other Reference

- 7.1. *Municipal Government Act, RSA 2000, c M-26 sections 201 & 207*
- 7.2. *Protection of Privacy Act, SA 2024, c. P-28.5*
- 7.3. *Access to Information Act, RSA 2000, c. A-1.4*
- 7.4. This policy guides the City's Privacy Management Program pursuant to Provincial Privacy Legislation.
- 7.5. If any provision of this policy conflicts with any provision of Provincial Privacy Legislation, the provision of Provincial Privacy Legislation prevails.

8. Version History

Action	Date	Description
New Policy	2026/06/08	