



CITY PROCEDURE

Collection, Use and Disclosure of Personal Information

Procedure Title	Collection, Use and Disclosure of Personal information		
Procedure Number	507-1	Approved Date	2026-07-16
Department	Legislative and Legal Services	Last Amended	2026-10-06
City Manager Signature	"S. Bourke" (signed)	Last Reviewed	2026-10-06
		Signature Date	2026-10-09

1. Purpose

- 1.1. The purpose of this procedure is to establish procedures for the Collection, Use and Disclosure of Personal Information in accordance with Provincial Privacy Legislation and City policy.

2. Scope

- 2.1. This procedure applies to all Employees who Collect, Use or Disclose Personal Information.

3. Definitions

The definitions in [Policy 507 Privacy Management](#) apply to this procedure. In addition, in this procedure:

- 3.1. **"Collection"** means the gathering, acquisition, receiving or obtaining of Personal Information, whether that information is collected through such methods as interviews, questionnaires, surveys, polling or by completing forms. Collection may be of writing, audio or video recordings, electronic data, or other such formats.
- 3.2. **"Disclosure"** means to release, transmit, reveal, expose, show, provide copies of, verbally state the contents of or give Personal Information by any other means to someone. It includes oral transmission or information by telephone, or in person; provision of Personal Information on paper, by facsimile or in any other format; and electronic transmission through electronic mail, data transfer or the internet.
- 3.3. **"Privacy Coordinator"** means the position responsible for operational administration, carrying out the powers, duties and functions related to Provincial Privacy Legislation that are delegated to the Privacy Coordinator by the City Manager.
- 3.4. **"Record"** means a Record of information in any form and includes notes, images, audio-visual recordings, x-rays, books, documents, maps, drawings, photographs, letters, vouchers and papers and any other information that is written, photographed, recorded or stored in any manner, but does not include software or any mechanism that produces Records as defined under the ATIA.



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- 3.5. **"Use"** means employing Collected information to accomplish the City's purposes such as using the information to administer a program or activity, provide a service or determine eligibility for a benefit. Access to a file or database by program staff or contract agent constitutes "use" as defined under the POPA.

4. Procedure & Guidelines

4.1. Accuracy and Retention

- 4.1.1. If an individual's Personal Information will be used to make a decision that directly affects the individual, including a decision made using an Automated System, Employees must make every reasonable effort to ensure the Personal Information is accurate and complete, for example by:
- a. Reviewing information at the time of Collection, including confirming the spelling of names and key identifiers with the individual;
 - b. Checking information against existing City Records, where appropriate; and
 - c. Updating or correcting information when an inaccuracy is identified or an individual reports a change in accordance with the [Access and Correction of Personal Information Procedure \(507-2\)](#).
- 4.1.2. Personal Information that has been Used to make a decision that directly affects an individual must be retained for at least one year after it is Used, so that the individual has a reasonable opportunity to obtain access to it, unless a shorter period has been agreed to in writing in accordance with section 6(b) of POPA.

4.2. Consent

- 4.2.1. Employees must obtain and document Consent for the Collection, Use or Disclosure of Personal Information in accordance with the [Consent Procedure \(507-8\)](#).

4.3. Collection Notice

- 4.3.1. Where Personal Information is Collected directly from an individual, Employees must provide a Collection notice unless otherwise authorized by legislation.
- 4.3.2. The Collection notice must identify:
- a. the purpose for the Collection;
 - b. the legal authority for the Collection;
 - c. the anticipated Use of the Personal Information;
 - d. contact information to which questions regarding the Collection may be directed; and
 - e. where the City intends, at the time of Collection, to input the Personal Information into an Automated System to generate content or make decisions, recommendations or predictions, a statement of that intention.



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4.3.3. Employees must provide the Collection notice at the time Personal Information is Collected.

4.3.4. The Collection notice may be provided orally, in writing, by signage or electronically

4.4. Collection

4.4.1. Employees must Collect Personal Information in a manner that:

- a.** Minimizes the risk of unauthorized Access, Use or Disclosure; and
- b.** Limits Collection to information necessary for the identified purpose.

4.4.2. Employees must not Collect Personal Information from a source other than the individual unless:

- a.** the Collection is permitted under POPA; and
- b.** the authority relied upon is documented prior to Collection.

4.5. Automated Systems

4.5.1. Employees must consult the Privacy Coordinator before implementing, acquiring, modifying or first using an Automated System that uses Personal Information to generate content or make decisions, recommendations or predictions.

4.5.2. Employees must not place an Automated System into operation unless any required Privacy Impact Assessment has been completed in accordance with the [Privacy Impact Assessment Procedure \(507-3\)](#) and appropriate privacy, security and governance controls have been implemented.

4.6. Use of Personal Information

4.6.1. Employees must only Use Personal Information where:

- a.** The Use is consistent with the original purpose of Collection;
- b.** Consent has been obtained; or
- c.** The Use is otherwise authorized by legislation.

4.6.2. Employees must:

- a.** Limit the Personal Information Used to the minimum amount necessary to achieve the authorized purpose; and
- b.** Access Personal Information only where required to perform their duties and responsibilities.

4.6.3. Employees must not access Personal Information out of curiosity, personal interest, convenience or for any unauthorized purpose.



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4.7. Routine Disclosure

- 4.7.1.** Employees must not Disclose Personal Information under this section unless:
- a.** the Disclosure is to the individual to whom information is about, consists only of that individual's own Personal Information, and is of a category listed in the Routine Disclosure Schedule; or
 - b.** the information is publicly available.
- 4.7.2.** The Privacy Officer must establish and maintain, and may amend from time to time, a Routine Disclosure Schedule listing the approved categories of routine Disclosure and specifying, for each category, the identity verification, delivery method and documentation required. The Schedule may be issued as a single document or as standard operating procedures for one or more Departments.
- 4.7.3.** Employees must comply with the verification, delivery and documentation requirements specified in the Routine Disclosure Schedule.
- 4.7.4.** Employees must Disclose only the Records or Personal Information that respond to the request and, where the Disclosure is to a person other than the individual the information is about, no more Personal Information than is necessary for the authorized purpose.
- 4.7.5.** An Employee must refer a request to the Privacy Coordinator under section 4.8 where the Record contains Personal Information about another individual, the requester's identity or authority cannot be verified, or the Employee is uncertain whether the Disclosure is routine. A requester may at any time make a formal access request under the ATIA instead.

4.8. Non-Routine Disclosures

- 4.8.1.** Employees must refer to the Privacy Coordinator any request for Disclosure of Personal Information that is not a Routine Disclosure under section 4.7.
- 4.8.2.** The Privacy Coordinator must manage and maintain Records of non-routine Disclosures.
- 4.8.3.** Sections 4.8.1 and 4.8.2 do not apply to a Disclosure that is expressly authorized by, and made in accordance with:
- a.** a contract or agreement that has been reviewed by the City Solicitor's Office, or an Information Sharing Agreement developed under the [Privacy Impact Assessment Procedure \(507-3\)](#); or
 - b.** a written procedure for the delivery of a program or service that identifies the Disclosure and its legislative authority.



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4.9. Disclosure to Law Enforcement, Regulatory Bodies or Other Public Bodies

- 4.9.1.** This section applies to Records and Personal Information in the Custody or Control of the City. It does not govern the collection, Use, Disclosure or management of information by the Grande Prairie Police Service, which is a separate public body under Provincial Privacy Legislation with its own privacy management program. Employees must redirect to the Grande Prairie Police Service any request for Records of that service, and must handle a request from the Grande Prairie Police Service for the City's Records in accordance with this section.
- 4.9.2.** On receiving a request under this section, Employees must immediately take steps to preserve the responsive Records, including suspending any scheduled destruction or overwriting, pending a decision on the request.
- 4.9.3.** Employees must refer all requests for Disclosure from law enforcement, regulatory bodies or other public bodies to the Privacy Coordinator, unless the Disclosure is:
- a.** made by the Public Safety Communications Centre in the course of law enforcement, in accordance with their operational procedures and any applicable information-sharing agreement;
 - b.** a Disclosure described in section 4.8.3; or
 - c.** an exigent Disclosure under section 4.9.6.
- 4.9.4.** Employees must refer to the Privacy Coordinator and the City Solicitor's Office every subpoena, warrant, production order, court order or other instrument that compels the production of information or Records, regardless of the information sought.
- 4.9.5.** The Privacy Coordinator must review and authorize the Disclosure and will:
- a.** Confirm that the Disclosure is authorized or required by applicable legislation or lawful authority;
 - b.** Where the Disclosure is compelled by a subpoena, warrant, order or rule of court, confirm with the City Solicitor's Office that the issuing court, person or body has jurisdiction in Alberta to compel the production;
 - c.** Limit the Disclosure to what is necessary;
 - d.** Verify the identity and authority of the requesting party, where applicable; and
 - e.** Document the Disclosure in accordance with established procedures, including the nature of the information disclosed, the authority relied upon and the recipient.
- 4.9.6.** In an emergency, an Employee may Disclose Personal Information to a law enforcement agency or other appropriate body without prior referral where the City Manager, or a person to whom that power has been delegated in writing under POPA, believes on reasonable grounds that the Disclosure will avert or minimize (a) a risk of harm to the health or safety of a minor, or (b) an imminent danger to the health or safety of any person. The Employee must limit the Disclosure to what is necessary in the circumstances,



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and must notify the Privacy Coordinator and document the Disclosure as soon as practicable afterward.

- 4.9.7. A Record of such Disclosures must be maintained in accordance with applicable legislation and Records management requirements.

4.10. Privacy Incident Response

- 4.10.1. Employees must promptly report any suspected or confirmed unauthorized access, loss or Disclosure of Personal Information to the Privacy Coordinator.
- 4.10.2. In the event of an incident, Employees must follow the [Privacy Incident Response and Notification Procedure \(507-6\)](#).

4.11. Information Classification

- 4.11.1. Employees must classify Personal Information using the classification levels and default classifications set out in the [Safeguarding Personal Information Procedure \(507-5\)](#).
- 4.11.2. Employees must apply safeguards based on the assigned classification in accordance with the [Safeguarding Personal Information Procedure \(507-5\)](#).
- 4.11.3. Employees must review and update classifications where the sensitivity or Use of the information changes.

5. Roles and Responsibilities

- 5.1. The City Manager will review and approve this procedure and any amendments.
- 5.2. Employees will comply with this procedure.

6. References and Related Documents

- 6.1. [Access to Information Personal Form](#)
- 6.2. [Access to Information General Form](#)
- 6.3. [Regulatory Bodies Disclosure Form](#)
- 6.4. Routine Disclosure Schedule (maintained by the Privacy Officer)

7. Version History

Action	Date	Description
New Procedure	2026-07-16	



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Amendment	2026-10-06	Revised to realign delegated authorities in 4.8.3.a.
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