

## Introduction

Town of Olds Privacy Management Program (PMP) was established in 2026 in response to the Province of Alberta's new requirements under the *Protection of Privacy Act* (POPA) to mandate that municipalities across the province establish and implement a PMP. The intention of the PMP is to provide for a consolidation of all documented policies, procedures, and practices of the municipality related to the Town's compliance with its duties as entrenched in POPA.

Although in response to a Provincial Requirement, the Town of Olds has a strong history of managing personal privacy through the establishment Administration approved procedures, as well as continual adherence to Provincial and Federal Legislation and ongoing efforts to understand, review, and implement industry best practices within the Town's operations and administration, it remains the Town's objective to maintain and build trust with its residents, landowners, businesses, and other various stakeholders while always striving to exceed all privacy requirements prescribed by legislation.

The PMP is written with the user in mind and an effort to provide a comprehensive source of all related documentation. Wherever possible, the PMP will provide references to other Town legislation that may be of assistance for users to review in order to obtain a complete understanding of the Town's commitment to privacy management.

The PMP will be available on the Town of Olds website for public review, and any inquiries can be forwarded to the Privacy Officer.

## Applicable Privacy Legislation

There are a number of pieces of legislation that are applicable to the development and ongoing review of the Town's PMP to ensure overall compliance. Most notable are the following:

### ***Provincial Legislation***

*Protection of Privacy Act which establishes the following purposes:*

- a) To control the collection, use and disclosure of personal information by a public body,*
- b) To allow individuals a right to request corrections to personal information about themselves that is held by a public body;*
- c) To control the creation, use and disclosure of data derived from personal information and non-personal data by a private body; and*
- d) To provide for independent reviews of decisions made by public bodies under this Act and the resolution of complaints under this Act.*

*Access to Information Act which establishes the following purposes:*

- a) To allow any person a right of access to the records in the custody or under the control of a public body subject to limited and specific exceptions as set out in this Act;*
- b) To allow individuals, subject to limited and specific exceptions as set out in this Act, a right of access to personal information about themselves that is held by a public body; and*
- c) To provide for independent reviews of decisions made by public bodies under this Act and the resolution of complaints under this Act.*

## **Municipal Legislation**

The Town of Olds has established the following Bylaws, Policies and accompanying Procedures which have content relevant to Privacy Management. All Town Bylaws, Policies, and Procedures noted below are available on the Town of Olds website.

Bylaw 2026-18 – Appointment of a Head and Establishment of Fees for Access to Information Act

Bylaw 2026-04 – Records and Information Management Bylaw

Policy 201C- Data Connection

Administrative Policy 134AP – Bring your own device

Policy 204C- Incident Management

Policy 235C – Privacy Management Program

Policy 236C – Artificial Intelligence

Records and Information Management Retention Schedule (Bylaw Schedule)

## **Organizational Commitment**

### **Organizational Structure**

The Town of Olds has an established structure to manage the governance and administrative functions of the municipality. This structure remains effective in the strategic development, approval and management of the PMP.

Council  
Chief Administrative Officer  
Leadership Team (Directors)  
Privacy Officer  
Access to Information Coordinator  
Town of Olds Employees

## Organizational Roles and Responsibilities

The Town of Olds has implemented role specific requirements for each level of the Organizational Structure as it is related to the PMP. Specific Town policy related to Privacy Management may provide additional, or more specific, roles and responsibilities to these individuals in the administration of those respective activities.

**Council:** Through the approval of Town of Olds Policy, Council remains committed to, and ultimately responsible for, the overall governance of the Town of Olds PMP. Responsible for overall strategic direction of the Program, Council's ongoing oversight, commitment to providing adequate resources to deliver the Program, and efforts to promote a culture of accountability and transparency are crucial to the success of the PMP.

**Chief Administrative Officer:** As the Administrative head of the Town of Olds, the Chief Administrative Officer oversees the development, implementation, and ongoing review of the PMP. The CAO is responsible for ensuring that resources that are provided are allocated appropriately towards the delivery of the Program.

**Leadership Team (Directors):** The Leadership Team serves as a conduit of information between the Chief Administrative Officer and their respective staff through establishing the strategic integration of the PMP into their various programs, operations, and projects of the department. As the Division head, the Leadership Team is responsible for ensuring that staff are informed, trained, and held responsible for the delivery of the Program while also ensuring that the principles and culture of the Program are implemented within their team.

**Privacy Officer:** As required by Provincial legislation, the Privacy Officer serves as the individual responsible for ensuring the Town of Olds' adherence with POPA and other privacy legislation such as the *Access to Information Act* (ATIA). The Privacy Officer ultimately remains responsible for all aspects of the PMP including the development, administration, review and implementation of the Program and the collection, use, and disclosure of personal information under the Town's custody and control. Currently the Director of Corporate Services serves as an important resource to the Access to information coordinator that perform much of the day-to-day operations of the Program and communication with Town staff and stakeholders.

**Access to Information Coordinator:** is responsible for the day-to-day administration and coordination of access to information and protection of privacy matters under Alberta's *ATIA and POPA*. Reporting to and operating under the direction of the designated Privacy Officer, the Coordinator works closely with the Privacy Officer to manage and processes access requests, supports compliance with legislative requirements, and coordinates records retrieval and review processes across departments. The coordinator serves as the primary administrative contact for ATIA and POPA requests and assists with privacy-related procedures, documentation, and response activities while promoting consistent, lawful, and accountable information management practices.

**Town of Olds Employees:** Staff play the largest part in the success of the PMP through their diligent adherence to the requirements and procedures contained within it. As the group of individuals that works directly with sensitive personal information on a day-to-day basis, these staff are essential to proper

collection, use, handling, storage, and disposition of information and an important resource to identify any changes that may be required to accomplish the Program's objectives.

**Designation of Privacy Officer – Appointment of Head and Establishment of Fees for Access to Information Act Bylaw 2026-18**

The Chief Administrative Officer shall have the authority to designate the Privacy Officer who shall be charged with ensuring adherence to POPA and the PMP. Currently, the Privacy Officer is the Director of Corporate Services. No further sub-delegations of the position of Privacy Officer will be permitted.

**Protection of Personal Information / Data Derived from Personal Information / Non-Personal Data – Policy 235C**

At the foundation of the Town of Olds' PMP is the commitment by the organization to create procedures and safeguards to appropriately protect an individual's personal information or information related to that personal information. Through ongoing training, engineered designs, or operational procedures, the Town has a strong focus on mitigating potential risks of unauthorized loss or disclosure through proactive measures. These measures include:

- Securing physical records in a manner consistent with their security classification level,
- Managing conversations relative to an individual's personal information to maximize confidentiality of the individual,
- Ensuring that personal information of an individual is out of sight from third parties and is stored away when the employee is away from their workstation, and
- Appropriately protecting personal information that is removed from the workplace.

**Security Classification System – Records and Information Management Bylaw 2026-04, Policy 235C**

The Town of Olds manages numerous records that contain personal information, data developed from personal information, and non-personal data which is essential to the various programs, services, and projects that are offered as part of the service delivery of the municipality. Although these records are stored in different formats, including both hard copy and electronic, the Town recognizes the importance of establishing a security classification system for each type of document to assist in establishing the level of security required to be implemented on the document type, determination of which users require access to the document type and in what situation, and to assist in investigation of potential security breaches/Incident Management to understand the risk exposure associated with the unauthorised use or loss of that specific document type.

The Town of Olds has established the following Security Classification System:

Security Level 1 (Low Risk): Public Information that would not cause risk of harm to individuals or the Town if disclosed.

Security Level 2 (Internal – General Staff): Information that may include personal data which if disclosed could reasonably be expected to have a risk of harm to the individual or the Town.

Security Level 3 (Confidential): Information that may include personal data which if disclosed could reasonably be expected to have a significant risk of harm to the individual or the Town.

Security Level 4 (Restricted): Information that may include personal data which if disclosed would create significant risk of harm to the individual or the municipality including severe legal, psychological, reputational, financial or other harm to the individual or the Town.

### **Personal Information Banks – Policy 235C**

The Town of Olds maintains a directory of Personal Information Banks that assists in providing public transparency about the type of personal information that we collect, why that collection happens, and how we intend to use it. The directory is provided on the Town’s website for public review.

Each Personal Information Bank contains the following information:

- The title and location of the Personal Information Bank,
- A description of the kind of personal information and the categories of individuals whose personal information is included,
- The legal authority for collecting the personal information, and
- The purpose of the collection of personal information and the purposes for which it is used or disclosed.

The Town will endeavour to maintain this listing to be as accurate as possible but will undertake an annual review at minimum and update the directory of all newly acquired information that has been gathered since the previous review.

### **Privacy Impact Assessments – Policy 235C**

The creation of Privacy Impact Assessments (PIAs) is an integral component in the Town of Olds’ ability to adequately ensure that reasonable security arrangements have been taken to mitigate the risk of unauthorized access, collection, use, disclosure or destruction of personal information.

The Town is committed to developing a PIA before a new or updated project, process, or system is initiated that would involve the collection, use, or disclosure of personal information **and** if:

- The loss of, unauthorized access to or disclosure of the personal information could result in significant harm to the individual;
- The proposed initiative would collect, use, or disclose personal information deemed to be of high sensitivity;
- The proposed initiative will involve the personal information of a significant percentage of the Town;
- The proposed initiative will involve data matching between the Town and another public body;
- The proposed initiative is part of a common or integrated program; or
- The proposed initiative involves the development or use of innovative technologies.

In preparation of the PIA, the project lead shall engage the Privacy Officer as soon as practicable to allow for privacy and security considerations to be put into place prior to the launch of the project.

The Town will utilize the PIA Template provided by the OIPC for the development and approval of any PIA deemed necessary.

### **Artificial Intelligence – Policy 236C**

Artificial Intelligence (AI) has become a growing trend in all industry sectors including municipal government due to its ability to automate processes more efficiently, provide research and analytical capabilities to organizations, and assist users with the creation of records in a more expedient manner than they were previously capable of.

With the benefits of AI, the Town has also recognized the challenges that it poses to ensuring personal information is protected appropriately. As such, the Town permits the use of certain AI tools for employees to utilize but has also entrenched firm privacy management procedures into the use of these tools. When using AI, employees are required to:

- Only use the AI tools that have been approved by the Town as those are the tools that pose the lowest risk to privacy breaches;
- Ensure that the use of AI tools is always in compliance with provincial legislation including POPA and ATIA;
- Only use non-personal, non-sensitive and non-confidential information in the AI tool. Uploading information that contains personal information or confidential data is prohibited;
- Undertake training prior to using AI tools;
- Attribute when AI tools have been used to generate a material percentage of the generated content; and
- Follow ethical and legal rules when using AI tools.

The Town recognizes that the use of Artificial Intelligence will continue to be more prevalent as more tools and uses become available to streamline efficiencies and is committed to continually reviewing the applicability of this Policy to ensure it balances the need for efficiency with the requirement for information security.

### **Non-Personal Data - Policy 235C**

The Town of Olds does not currently generate significant amounts of non-personal data and typically only does so on an ad-hoc, project focused basis. With that being said, there are likely advantages to the generation of non-personal data from an analytical and research point of view. As such, when the Town does create non-personal data, it will commit to:

- Ensuring as much as possible that the identity of the individual cannot be re-identified,
- Reviewing the security risks and mitigative steps associated with the creation of the non-personal data,
- Maintaining a record of the creation of the dataset and the steps taken to ensure privacy by the Town, and
- Ensure that non-personal data is only used in accordance with POPA and ATIA.

As the Town looks further into the generation of non-personal data, it will intend to update its applicable regulations and safeguards to remain applicable and effective.

### **Employee Training – Policy 201C, Policy 204C, Policy 236C, Administrative Policy 134AP**

The Town of Olds recognizes that everybody in the municipality has a role to play in the protection of personal information and the overall success of the PMP. The Town is committed to making sure that employees have access to training on the PMP at the onset of their employment, role specific training depending on the nature of their interface with personal information and on-going routine training to re-establish the principles and requirements of the Program.

Each Permanent Employee shall receive refresher training on their roles, responsibilities and obligations under the PMP every four years.

The Town of Olds commitment to employee training on the PMP include:

- Town of Olds Employee Onboarding
- Information Management and Security Awareness Training (eLearning)
- Department/Role specific privacy training (as required)
- Privacy Officer training
- POPA/ATIA Refresher training.

Third parties, including contracted services personnel, performing duties on behalf of the Town that will have access to, or will be responsible for collection of, personal information are to be considered employees for the purposes of complying with POPA and ATIA, and will also be subject to similar training requirements and privacy responsibilities and obligations as Town employees. The Town will endeavour to always maintain third party compliance to the PMP.

#### **Retention and Disposition of Personal Information – *Records and Information Management Bylaw 2026-04***

The Town of Olds has a retention and disposition policy that assists with ensuring that personal information is destroyed after they no longer have an operational, legal, fiscal, or archival use for the Town. Not only does this help the Town of Olds control the total number of records that it has to manage, but it also ensures that personal information collected from individuals is not unduly held and thereby lowers the risk of unauthorized use or disclosure.

The retention schedule maintained by the Town outlines each classification of document and the set retention period that the Town must maintain that record for. Once that document has reached the end of its lifecycle, the Town proceeds with destruction of the document (shredding for hard copies or permanent electronic deletion if electronic). All dispositions of documents are recorded and stored to facilitate future reference.

## **Privacy Breaches and Complaints**

#### **Privacy Incident Procedures – *Policy 204C, 235C***

The Town of Olds has taken every reasonable effort to ensure that personal information is secured and used appropriately and in accordance with legislation. However, even with best efforts there may be times when these safeguards have become compromised or are inadequate and a security breach has occurred which has the potential to have a loss of, unauthorized access, or unauthorized disclosure of personal information in the custody of the Town.

Any individual that is aware of a potential breach is required to notify the Privacy Officer immediately either directly, or through the Town's established complaint process. Once being notified, the Privacy Officer will initiate an investigation immediately to:

- Identify the nature, scale, source, and potential harm of the breach;
- Identify immediate actions needing to be taken to limit the risk exposure and to contain that respective breach;
- Determine future mitigative steps required to avoid a similar breach in the future which may include enhanced security measures, discontinuation of current practices, training and communication for employees, reclassification of information security, or other methods determined appropriate by the Privacy Officer;
- Provide a report to the Senior Management Team on the incident and results of the investigation; and
- Provide follow up communication to the individual that submitted the incident on the Town's response to the incident.

In the event that the Town of Olds has determined that the incident has resulted in a real risk of significant harm to the individual, the Town of Olds will notify the individual with all pertinent information on the incident, steps that the Town of Olds has taken to reduce the risk of harm to the individual, and relevant details on and the ability for the person to request a review of the incident by the Commissioner. (Section 4(3) - POPA Regulations)

#### **Complaints – Policy 235C**

Individuals are permitted to request a review of the Commissioner for various decisions made under POPA. In the event that this is requested, individuals are required to provide a formal complaint in writing to the Privacy Officer regarding the matter that will be subject to the review. These complaints will be managed in accordance with Policy 235C with appropriate written response provided back to the individual.

## Program Review and Monitoring

The Town of Olds recognizes that the protection of privacy landscape has become a fluid and evolving requirement which has become more prevalent due to technological changes, societal expectations, and the enhanced risks associated with loss or misuse of personal information. Therefore, the Town of Olds is committed to ongoing and routine review of the PMP and its components. The following monitoring frequency will be established, with recognition that timelines may be earlier than required due to legislation changes or ongoing pursuits to establish best practices related to Privacy Management. As part of transitioning to the new legislation, the Town is updating notifications on various forms and webpages for its collection of personal information.

Privacy Management Program Component	Minimum Review Frequency
Privacy Management Program Framework	Annual
Privacy Management Policies and Procedures	Four Years
Directory of Personal Information Banks	Annual
Directory of Privacy Impact Assessments	Annual
Appointment of Privacy Officer	As needed
Security Classification Systems	Four Years