# IV. Administration Policies

## 8. Protection of Privacy Act

Sundre Municipal Library will only collect personal information if the information is necessary for an operating program or activity of the library. Library employees and volunteers will not inappropriately disclose any private information gathered in the due course of their employment. Sundre Municipal Library will make their Privacy Management Program available upon request.

**8.1 Designation of a privacy officer** Section 6(1)a (MIN)

The library manager will serve as the privacy officer who is responsible for compliance with the Protection of Privacy Act (POPA)

**8.2 Correction of Personal Information** Section 7

An individual who believes there is an error or omission in their personal information held by the library may request that their information be corrected, in accordance with guidelines outlined in Section 7 of the POPA.

**8.3 Notification of Incident or Loss of Personal Information** Section 10(2)

If an incident occurs involving the loss of, unauthorized access to, or unauthorized disclosure of personal information in the library's custody where there is real risk of significant harm to an individual as a result of that loss, the library will give notice to

a) the individual
b) the library's Privacy Officer
c) the Commissioner
d) the Minister

**8.4 Request for Review** Section 38(2)

If a complaint regarding personal information about an individual has been received by Sundre Municipal Library, a request for review cannot be delivered to the Commissioner unless the library does not respond to the complaint within 30 business days of receiving the complaint.

**8.5 Creation, Use, and Disclosure of Personal information** Section 6(1) ii (MIN)

Sundre Municipal Library may create and use non-personal data for statistics to assist in decisions about member library services. The library will ensure that individuals cannot be re-identified.

**8.6 Personal Information in Automated Systems** Section 6(1) iii (MIN)

Sundre Municipal Library does not use automated systems to generate content or make decisions, recommendations, or predictions.

# IV. Administration Policies

**8.7 Security Classification System** Section 6(1) c (MIN)

High-sensitivity information is defined in the (Ministerial) Regulations to include personal information related to biometric, financial, or personal information regarding a minor, senior, or vulnerable individual. Any high-sensitivity information will be protected with additional safeguards.

**8.8 Mandatory Training** Section 6(1) d (MIN)

Library staff will be trained annually regarding their responsibilities under POPA.

**8.9 Review of Privacy Management Program** Section 6(1) e (MIN)

The library Privacy Management Program will be reviewed and updated, if needed, every three years.

**8.10 Privacy Impact Assessments** Section 7(1) (MIN)

The library will conduct a Privacy Impact Assessment (PIA) whenever there is new or changes to any administrative practice, program, project, or service that will involve the collection, use, or disclosure of personal information if one or more of the following apply:

a) the loss of personal information could result in significant harm
b) one or more of the factors requiring the submission of a PIA to the Commissioner apply. See Section 7(5) (MIN)

The library will submit a copy of any PIA to the Commissioner, if required by guidelines outlined in the (Ministerial) Regulation or by specific request of the Commissioner.
A Privacy Impact Assessment must:

- include a summary of the purpose of the collection, use, or disclosure of personal information for the new, or substantial change to an existing, administrative practice, program, project or service
- identify the types of personal information that will be collected, used or disclosed and reasonable security arrangements in place to protect that personal information.
- identify the legal authorities for the collection, use, or disclosure of the personal information
- identity of any privacy risks and mitigation strategies respecting the personal Information
- identify the administrative, physical, and technical safeguards in place to protect the personal information
- describe accuracy, correction, and retention procedures that will be implemented to ensure the personal information is accurate and complete

Completed PIAs will be retained for six years. See 8.14 Records Retention Schedule.

# IV. Administration Policies

**8.11 Consent to Gather Personal Information** Section 6(2) iv (MIN)

Sundre Municipal Library will require written, verbal or electronic consent for the gathering of personal information. If the information is to be used to make a decision that directly affects the individual, the library will retain the records for one year, or the amount of time agreed to in writing by

a) The individual
b) The Library Manager, or the "Head"
c) The Library Records Retention Schedule

**8.12 Manner of Collection** Section 5(2)

The library will collect personal information directly from the individual the information is about. A collection notice will be provided at the time of collection and can be provided either in writing, or verbally during an in-person conversation. The collection notice must include:

a) The purpose for which the information is collected
b) The specific legal authority for the collection
c) The contact information to which the individual may direct the individual's questions about the collection

**8.13 Administrative, Technical, and Physical Safeguards** Section 6(2) b (MIN)

1. Administrative Safeguards: The library will restrict access to personal information to those who need it for the regular duties of their employment.
2. Physical Safeguards: Personal information will be locked in regular or fire-proof filing cabinets depending on the Security Classification of the information.
3. Technical Safeguards: Parkland will employ firewalls and restriction to electronic access to personal information within the SuperNet.

# IV. Administration Policies

### 8.14 Delegation by Head of Public Body Section 55

*Protection of Privacy Act* - Delegation Tables

| Duty, power or function of Head | Section reference | Retained by Head | Delegated to Privacy Officer |
|---|---|---|---|
| **Collection, Correction, Protection of Personal Information** | | | |
| Authority to set aside collection requirements | 5(3), (4) | | X |
| Authority to decide on requests for correction of personal information | 7(1) | | X |
| Duty to correct, annotate or link personal information, duty to notify previous recipients | 7(3), (4) | | X |
| Duty to give notice to individual requesting correction | 7(7) | | X |
| Authority to transfer a request for correction | 8 | | X |
| Duty to ensure protection of personal information by making reasonable security arrangements | 10(1) Regulation (MIN) 2,3 | | X |
| Duty to notify the affected individual when there exists a significant risk of harm | 10(2) Regulation (MIN) 4 | | X |
| Duty to ensure protection of data derived from personal information | 20 | | X |
| Duty to ensure protection of data derived from non-personal data | 24 | | X |
| **Use and Disclosure of Personal Information** | | | |
| Establishing rules for electronic consent | Regulation 2(4)(a) | | X |
| Establishing rules for oral consent | Regulation 2(5)(a) | | X |
| Authority to disclose to guardian of a minor | 54(1)(e) | | X |
| Authority to disclose to relative or adult interdependent partner of deceased individual | 13(1)(s) | | X |

# IV. Administration Policies

| | | | |
|---|---|---|---|
| Authority to disclose to avert imminent danger to health or safety | 13(1)(cc) Regulation 1(1)(b) | | X |
| Authority to approve conditions for disclosure for research and statistical purposes and for administration of research agreements | 15 | | X |
| **Reviews and Complaints** | | | |
| Authority to ask the Commissioner for advice | 28(1) | | X |
| Authority to require Commissioner to examine original record on site | 29(4) | | X |
| Right to make representations to the Commissioner | 41(6),(8) | | X |
| Duty to comply with Commissioner's Order | 44 | | X |
| **General Provisions** | | | |
| Duty to publish a directory of the body's personal information banks and keep it current | 57(2),(5) | | X |
| Duty to record uses or disclosures of personal information not included in directory | 57(4) | | X |

**Delegation Table - Administrative Responsibilities in the Protection or Privacy Act and Regulation that May be Assigned**

| Duty, power or function or public body | Section reference | Retained by Head | Delegated to Privacy Officer |
|---|---|---|---|
| **Collection, Accuracy and Retention of Personal Information** | | | |
| Establishing controls over the collection, use, and disclosure of personal information | 2(a) | | X |
| Authorizing routine correction of personal information | 2(b) | | X |
| Ensuring authorized purpose of collection | 4 | | X |

## IV. Administration Policies

| | | | |
|---|---|---|---|
| Assuring proper collection and notification | 5 | | X |
| Assuring accuracy of personal information | 6(a) | | X |
| Applying retention standards | 6(b) | | X |
| **Use and Disclosure of Personal Information** | | | |
| Assuring appropriate uses | 12 | | X |
| Assuring appropriate purposes of data matching | 17 | | X |
| Assuring appropriate uses of data derived from personal information | 18 | | X |
| Assuring appropriate purposes of disclosure of data derived from personal information | 19 | | X |
| Assuring appropriate purposes for creation of non-personal data | 21<br>Regulation (MIN) 5(1) | | X |
| Assuring appropriate use and disclosure of non-personal data | 22, 23<br>Regulation (MIN) 5(2) | | X |

| | |
|---|---|
| Approved: 17 October 2007 | Amended: Jan 10, 2008; Oct 15, 2009; Jan 13, 2011; Aug 11, 2011; Feb 16, 2012; Aug 28, 2019; Sep 18, 2024; June 25, 2025; March 19, 2026 |