

Title:	Privacy Management Program	
Policy No:	1047	
Effective Date:	June 9, 2026	
Motion Number:	26.180	
Responsible Department:	Legislative & Administrative Services	
Review Date:	June 9, 2029	
Legal References:	Cross References:	
Municipal Government Act, R.S.A., 2000, c.M-26.	Bylaw 22-929 Records Retention & Disposition	
Protection of Privacy Act, S.A., 2024, c.P-28.5.	Policy 1042 Access to Information & Protection of Privacy	
Access to Information Act, S.A., 2024, c.A-1.4.		
Purpose:	<p>The purpose of this Policy is to establish a comprehensive and consistent framework for the management of personal information under the custody or control of the Municipal District of Greenview No. 16. This Policy supports compliance with applicable access to information and privacy legislation and ensures that personal information is collected, used, disclosed, retained, and protected in a manner that is lawful, accountable, and transparent.</p> <p>This Policy further establishes the principles, roles, and governance structures that guide the responsible stewardship of personal information, promotes public trust in municipal operations, and supports the effective delivery of programs and services.</p>	

1. DEFINITIONS

- 1.1. **Administration** means the Chief Administrative Officer or any employee of Greenview who is accountable to the CAO.
- 1.2. **Authorized Representative** means a person legally authorized to act on behalf of an individual in respect of their personal information, including but not limited to a guardian, trustee, or individual acting under a valid legal authority.
- 1.3. **CAO** means the Chief Administrative Officer, or their designate.
- 1.4. **Custody or Control** means the physical possession of, or authority over, information, regardless of its location, and includes information created or received in the course of municipal operations.
- 1.5. **Greenview** means the Municipal District of Greenview No. 16.
- 1.6. **Personal Information** means recorded information about an identifiable individual as defined by applicable legislation, including any information that can reasonably be used to identify an individual.

- 1.7. **Personal Information Bank (PIB)** means a collection of personal information that is organized or capable of being retrieved by an individual's name or other identifying particular.
- 1.8. **Privacy Impact Assessment (PIA)** means a structured assessment process used to identify, evaluate, and mitigate privacy risks associated with programs, services, systems, or initiatives involving personal information.

2. POLICY STATEMENT

- 2.1. Greenview is committed to the protection of personal information and will ensure that all personal information in its custody or control is managed in accordance with applicable legislation and sound information governance practices.
- 2.2. Personal information shall be collected only where necessary for authorized municipal purposes, and individuals shall be informed of the purpose of collection and the intended use or disclosure of their information.
- 2.3. The collection, use, and disclosure of personal information shall be limited to that which is necessary to fulfill identified purposes, and shall not occur except where authorized by legislation or with the consent of the individual.
- 2.4. Greenview shall take reasonable steps to ensure that personal information is accurate, complete, and protected through appropriate administrative, technical, and physical safeguards.
- 2.5. Individuals have the right to access and request correction of their personal information in accordance with applicable legislation.
- 2.6. Greenview shall maintain a Privacy Management Program to support compliance, promote consistent practices across the organization, and ensure effective oversight of privacy risks.

3. PROGRAM ADMINISTRATION

- 3.1. The Legislative & Administrative Services Department, through the designated Records & Information Coordinator, is responsible for overseeing the implementation, coordination, and ongoing administration of the Privacy Management Program.
- 3.2. The Privacy Management Program will include policies, procedures, standards, and supporting tools that collectively guide the collection, use, disclosure, retention, and protection of personal information.
- 3.3. Greenview will regularly review and update its privacy governance framework to ensure continued alignment with legislative requirements, organizational priorities, and evolving risks.
- 3.4. The Records & Information Coordinator shall provide guidance, interpretation, and direction to departments regarding the application of privacy legislation and this Policy, including matters related to the collection, use, disclosure, retention, and protection of personal information.

- 3.5. The Records & Information Coordinator shall support departments in identifying and addressing privacy risks and in ensuring consistent and compliant practices across Administration.
- 3.6. Greenview shall monitor, evaluate, and assess its privacy, access to information, and information security practices to ensure ongoing compliance with applicable legislation and to proactively identify and address emerging risks.

4. PERSONAL INFORMATION MANAGEMENT

- 4.1. Personal information shall be collected, used, disclosed, retained, and disposed of only in accordance with authorized purposes and applicable legislation.
- 4.2. Administration shall ensure that personal information within its custody or control is limited to what is necessary, handled in accordance with this Policy, and maintained with appropriate safeguards based on its sensitivity.
- 4.3. Access to personal information shall be restricted to authorized individuals where such access is required to perform assigned duties.
- 4.4. Any unauthorized access, use, or disclosure of personal information shall be reported and addressed in accordance with established privacy breach procedures.

5. PERSONAL INFORMATION BANKS

- 5.1. Greenview shall establish, maintain, and keep current a directory of Personal Information Banks that identifies personal information under its custody or control, in accordance with applicable legislation.
- 5.2. Each Personal Information Bank shall be documented with sufficient detail to clearly identify the type of personal information collected, the purpose and legal authority for its collection, and the circumstances under which the information may be used or disclosed.
- 5.3. The Personal Information Bank directory shall be made available to the public in accordance with legislative requirements to support transparency and accountability in the management of personal information.
- 5.4. Administration shall notify the Records & Information Coordinator of any new, modified, or discontinued collections of personal information to ensure that Personal Information Banks are accurately established, reviewed, and updated in a timely manner.

6. PRIVACY IMPACT ASSESSMENT

- 6.1. Privacy Impact Assessments shall be conducted for any new or significantly modified program, system, service, or initiative that involves the collection, use, disclosure, or processing of personal information.

- 6.2. Privacy Impact Assessments shall identify privacy risks, assess legislative compliance, and establish measures to mitigate identified risks prior to implementation.
- 6.3. Administration shall not implement any initiative requiring a Privacy Impact Assessment until the assessment has been completed and identified risks have been appropriately addressed.

7. TRAINING AND AWARENESS

- 7.1. Greenview shall provide training, communication, and resources to ensure Administration is aware of and understands its obligations under this Policy and applicable privacy legislation.
- 7.2. Administration shall comply with all applicable privacy requirements and shall seek guidance from the Records & Information Coordinator where responsibilities or obligations are unclear.
- 7.3. Training and awareness initiatives shall support the consistent application of this Policy and reinforce accountability in the management of personal information.

8. COUNCIL RESPONSIBILITIES

- 8.1. Council shall approve and periodically review this Policy to ensure alignment with applicable legislation and governance objectives.
- 8.2. Council shall provide governance oversight by ensuring that appropriate privacy management practices are established and maintained.
- 8.3. In carrying out its governance role, Council shall consider privacy implications in decisions involving the collection, use, or disclosure of personal information at a policy or strategic level.

9. ADMINISTRATION RESPONSIBILITIES

- 9.1. The CAO shall act as the Head under applicable access to information and privacy legislation and is responsible for ensuring organizational compliance.
- 9.2. The Records & Information Coordinator, as designated by the CAO, is responsible for Greenview's access to information and privacy obligations in accordance with applicable legislation and delegated authority.
- 9.3. Department Managers shall ensure that personal information within their areas is managed in accordance with this Policy and applicable legislation, including ensuring awareness, compliance, and timely reporting of privacy risks or incidents within Administration.



9.4. Administration shall protect personal information in its custody or control, use it only for authorized purposes, and report any suspected privacy breaches in accordance with established procedures.