

Title:	Personal Information Collection, Use, and Disclosure	
Policy No:	1049	
Effective Date:	August 25, 2026	
Motion Number:	26.387	
Responsible Department:	Legislative & Administrative Services	
Review Date:	August 25, 2029	
Legal References:	Cross References:	
Municipal Government Act, R.S.A., 2000, c.M-26.	Policy 1042 Access to Information & Protection of Privacy	
Protection of Privacy Act, S.A., 2024, c.P-28.5.	Policy 1047 Privacy Management Program	
Access to Information Act, S.A., 2024, c.A-1.4.		
Purpose:	The purpose of this Policy is to ensure the Municipal District of Greenview No. 16 collects, uses, discloses, and manages personal information in a lawful, secure, and accountable manner while protecting individual privacy, supporting responsible information sharing, and maintaining public trust in Greenview's programs, services, and operations.	

1. DEFINITIONS

1.1. **ATIA** means the Access to Information Act, S.A., 2024, c.A-1.4.

1.2. **Authorized Representative** means any person who can exercise the rights or powers of an individual. This includes the right of access to an individual's personal information and the power to provide consent for disclosure of such information. This may include:

- 1.2.1. An executor or administrator of the estate of an individual who is deceased, for purposes of administering the estate;
- 1.2.2. A guardian or trustee of a dependent adult, according to appointment under law;
- 1.2.3. An agent under a personal directive, in accordance with the directive;
- 1.2.4. An individual who is acting under specific provisions of a power of attorney;
- 1.2.5. A guardian of a minor under 18 years of age, excluding mature minors, if the exercise of the rights or powers of the guardian would not be an unreasonable invasion of the personal privacy of the minor; and
- 1.2.6. An individual acting with the written authorization of an individual.

1.3. **CAO** means the Chief Administrative Officer, or their designate.

1.4. **Collection** means to gather, acquire or obtain personal information about an individual, from any source, including third parties.

1.5. **Common or Integrated Program or Service** means a program or service planned, administered, delivered, managed, monitored or evaluated by Greenview working

collaboratively with one or more other public bodies or another public body working on behalf of Greenview or Greenview and one or more other public bodies.

- 1.6. **Consent** means informed agreement by an individual to the use or disclosure of their own personal information held by a public body, which can be revoked by the individual at any time.
- 1.7. **Custody or Control** means the possession of, authority over, or responsibility for records or information, regardless of format or storage location, held by or on behalf of Greenview.
- 1.8. **Data Derived from Personal Information** means data created or derived from data matching that identifies individuals whose personal information was used in the data matching process. May include AI Inferences.
- 1.9. **Data Matching** means linking of personal information between 2 or more databases or other electronic sources of information.
- 1.10. **Disclosure** means giving access to or making the personal information in Greenview's custody or control available to a person or organization external to Greenview.
- 1.11. **Employee** means the persons employed by Greenview in any capacity.
- 1.12. **Greenview** means the Municipal District of Greenview No.16.
- 1.13. **Non-Personal Data** means data, including data derived from personal information and synthetic data, that has been generated modified or anonymized so that it does not identify any individual.
- 1.14. **OIPC** means the Office of the Privacy Commissioner of Alberta who oversees compliance with Alberta's access to information and privacy laws and investigates complaints.
- 1.15. **Personal Information** means information about an identifiable individual, including the individual's name; home address, telephone number, email address, or other personal contact information; race, national or ethnic origin, colour, or religious or political beliefs, or associations; age, sex, marital or family status; identifying numbers or other unique identifiers; fingerprints, blood type, or other biological information; educational, financial, employment, or criminal history; the individual's personal views or opinions; and the views or opinions of another individual about that individual, but does not include contact information of an individual acting in a business professional, or official capacity where it is provided on behalf of an employer or organization.
- 1.16. **Research Purposes** means academic, applied, or scientific research, excluding internal program or quality improvement assessments, that necessitates the use of individually identifying personal information.
- 1.17. **Security Safeguards** means administrative, technical, and physical measures implemented to protect information from unauthorized access, use, disclosure, alteration, or destruction.
- 1.18. **Use** means the handling, processing, accessing, or application of personal information within Greenview for an authorized purpose.

2. POLICY STATEMENT

- 2.1. Greenview is committed to protecting privacy, strengthening public trust, and ensuring responsible stewardship of information in support of transparent and accountable municipal operations. Greenview recognizes that the effective delivery of programs and services depends on the careful balance between respecting individual privacy rights and enabling the appropriate use of information for legitimate operational purposes.
- 2.2. This Policy provides the governance framework for how information is managed across Greenview, ensuring consistent expectations for accountability, security, and responsible decision-making in all information-related activities.
- 2.3. This Policy applies to all individuals who collect, access, use, disclose, manage, or store personal information or related data on behalf of Greenview, including employees, elected officials, contractors, consultants, volunteers, and service providers. It applies to all Greenview programs, services, systems, records, and technologies, regardless of format or location.
- 2.4. This Policy does not apply to information that is lawfully outside Greenview's custody or control, or to data that has been irreversibly de-identified such that individuals can no longer be reasonably identified.

3. COLLECTION OF PERSONAL INFORMATION

- 3.1. Greenview collects personal information only when:
 - 3.1.1. The collection is expressly authorized by legislation;
 - 3.1.2. The information is collected for the purposes of law enforcement; or
 - 3.1.3. The information relates directly to and is necessary for an operating program or activity of the public body, including a common or integrated program.
- 3.2. Greenview collects personal information directly from the individual, or their authorized representative. Greenview only collects personal information indirectly from another source in the following circumstances:
 - 3.2.1. The indirect collection is authorized by the individual, other legislation, or the Alberta information and privacy commissioner;
 - 3.2.2. The personal information may be disclosed to Greenview under the disclosure provisions outlined below;
 - i. The personal information is collected in a health and safety emergency, and the individual is unable to provide the information;
 - ii. Direct collection could reasonably be expected to endanger the mental or physical health or safety of the individual or of any other person;
 - iii. The personal information is about a designated emergency contact;

- iv. The personal information is required to determine suitability for an honour or award;
- v. The personal information is required to verify the individuals' eligibility for participation in a program or to receive a benefit, product, or service from Greenview;
- vi. The personal information is collected from public sources for fund-raising;
- vii. The personal information is required for a law enforcement purpose;
- viii. The personal information is required to collect a fine or debt owed to the public body, or for use in the provision of legal services to Greenview;
- ix. The personal information concerns the history, release, or supervision of an individual under the supervision of a correctional authority;
- x. The personal information is required to inform the public trustee or public guardian about clients or potential clients;
- xi. The personal information is required for enforcing an order under the maintenance enforcement act;
- xii. The personal information is required to manage or administer Greenview personnel;
- xiii. The personal information is required to support researching or validating claims, disputes, or grievances of aboriginal people;
- xiv. The personal information is required to plan, manage, deliver, monitor and evaluate a common or integrated program or service.

3.3. When collecting personal information directly from an individual, Greenview informs the individual of the purpose for which the information is collected, the legal authority for the collection, any intention to input the information into an ai service, and contact information of the individual who can answer questions about the collection.

3.4. Notifications are included on the medium or at the location of collection (websites, forms, pamphlets, posters). Notice is not required in circumstances when personal information is collected indirectly, for authorized purposes.

3.5. Greenview employees collect only the amount and types of personal information as required to complete the stated function or purpose.

4. CONSISTENT PURPOSES

4.1. Greenview will primarily use and disclose personal information for the purpose for which it was originally collected or for a consistent purpose.

4.2. For a use or disclosure to be for a consistent purpose, Greenview must determine that the proposed use or disclosure is:

4.2.1. Directly connected to the original purpose for collection; and

4.2.2. Necessary for operating a program or common or integrated program or service of Greenview.

4.3. In assessing the consistent purpose, Greenview must consider:

4.3.1. The nature of the original purpose documented at the time of collection;

4.3.2. Whether the new use or disclosure is a logical extension of that purpose;

4.3.3. The expected impact on the individual's privacy.

5. USE OF PERSONAL INFORMATION

5.1. Greenview may use personal information under the following circumstances:

5.1.1. For the purposes for which it was originally collected or for a use consistent with that purpose;

5.1.2. With the consent of the individual, when obtained in accordance with consent standards; or

5.1.3. For a purpose for which the information is disclosed to Greenview by another public body, under the allowable disclosure provisions.

5.2. Greenview employees use only the amount and types of personal information as required to complete the stated function or purpose.

6. DISCLOSURE OF PERSONAL INFORMATION

6.1. Greenview may disclose personal information for the purpose for which the information was collected or compiled or for a purpose consistent with that purpose;

6.2. Greenview may disclose personal information for an inconsistent purpose only in the following circumstances:

Individual Or Public Interests

6.2.1. With the consent of the individual, when obtained in accordance with consent standards;

6.2.2. To avert or minimize a risk of imminent harm and danger to the health and safety of any person;

6.2.3. So that the spouse or adult interdependent partner, relative or friend of an injured or deceased individual may be contacted, or to a relative of a deceased individual;

6.2.4. Personal information of a minor or parent or guardian of a minor, to a law enforcement agency or to another organization or public body providing services to the minor, if it is clearly in the best interest of the minor;

6.2.5. To an MLA to assist the individual;

6.2.6. If disclosure is not an unreasonable invasion of privacy;

Legal Or Enforcement Requirements

- 6.2.7. To comply with, or in accordance with, an enactment of Alberta or Canada;
- 6.2.8. In response to a subpoena, warrant or court order;
- 6.2.9. For law enforcement purposes;
- 6.2.10. For the supervision of an individual by a correctional authority, or to a lawyer or student-at-law acting for an inmate;
- 6.2.11. To comply with the maintenance enforcement act, or to the administrator of
- 6.2.12. The motor vehicle accident claims act;
- 6.2.13. To an officer of the legislature if required for their duties;

Operational Requirements

- 6.2.14. To an officer or employee of Greenview if necessary for their duties;
- 6.2.15. To an officer or employee another public body if necessary for planning, managing, delivering, monitoring or evaluating a common or integrated program or service;
- 6.2.16. To enforce a legal right, or to collect a fine or to make a payment, or for court and quasi-judicial proceedings;
- 6.2.17. To verify an individual's suitability or eligibility for a program or benefit;
- 6.2.18. To comply with the public interest disclosure provisions;
- 6.2.19. To the auditor general or any other prescribed person for audit purposes;
- 6.2.20. To another public body for the authorized purposes of data matching

Human Resources

- 6.2.21. To a union representative, with the consent of the individual;
- 6.2.22. For the management of personnel;

Public Dissemination and Research

- 6.2.23. To the provincial archives of Alberta or to Greenview archives or another public body archives for archival preservation purposes;
 - 6.2.24. For research or statistical purposes, under agreement; and
 - 6.2.25. When the information is available to the public.
- 6.3. Greenview employees disclose only the amount and types of personal information as required to perform their assigned duties.
 - 6.4. If there is no authority for the disclosure, the information cannot be disclosed. If the individual making the request for information wishes, they may make a formal ATIA request.
 - 6.5. Greenview will not sell personal information under its custody or control in any circumstance or for any purpose.

7. RESEARCH DISCLOSURE

7.1. Personal information may be disclosed for statistical or research purposes, only if:

- 7.1.1. Research cannot reasonably be accomplished in a non-identifiable form or is approved by the OIPC;
- 7.1.2. Data matching resulting from the disclosure is not harmful to the individuals the information is about and the benefits are clearly in the public interest;
- 7.1.3. Greenview has approved conditions relating to security and confidentiality, removal or destruction of individual identifiers, and prohibition of any subsequent use or disclosure without authorization; and
- 7.1.4. All of the conditions are set out in a written research proposal and agreement.
- 7.1.5. Research proposals and agreements shall be reviewed and approved by Greenview's Records and Information Coordinator.

8. DATA MATCHING AND NON-PERSONAL DATA

8.1. Greenview may conduct data matching activities involving personal information and may create data derived from personal information or non-personal data where the activity is necessary to:

- 8.1.1. Conduct research, analysis, forecasting, reporting, or statistical activities;
- 8.1.2. Plan, administer, deliver, monitor, evaluate, or improve programs, services, operations, projects, or initiatives;
- 8.1.3. Support strategic planning, asset management, infrastructure planning, financial planning, service level reviews, or operational decision-making;
- 8.1.4. Assess program effectiveness, organizational performance, service delivery outcomes, or resource allocation requirements; or
- 8.1.5. Satisfy legislative, regulatory, reporting, auditing, accountability, or funding requirements.

8.2. Data matching activities may involve:

- 8.2.1. Personal information under Greenview's custody or control;
- 8.2.2. Personal information lawfully collected from another public body; or
- 8.2.3. The comparison, linkage, integration, or analysis of information from two or more information sources.

8.3. Prior to undertaking a data matching activity, Greenview shall identify and document:

- 8.3.1. The purpose of the activity;
- 8.3.2. The personal information required to support the activity;
- 8.3.3. Any privacy, confidentiality, security, or information management risks associated with the activity; and

8.3.4. The safeguards implemented to protect personal information and mitigate identified risks.

8.4. Greenview shall implement appropriate administrative, technical, and operational safeguards, including human oversight, validation, monitoring, auditing, and quality assurance measures, to support the accuracy, reliability, integrity, security, and appropriate use of data derived from personal information and non-personal data.

8.5. Data derived from personal information shall be retained, used, and disclosed only for the purpose for which it was created and only for as long as reasonably necessary to fulfill that purpose.

8.6. Greenview may disclose data derived from personal information:

8.6.1. To a public body that provided information used in data matching activity where the disclosure supports the purpose for which the data was created; or

8.6.2. Where the disclosure is otherwise authorized by legislation.

8.7. Non-personal data may be used for research, analysis, reporting, strategic planning, service delivery improvement, operational decision-making, performance measurement, asset management, financial planning, and organizational performance evaluation.

8.8. Non-personal data shall only be disclosed to a third party pursuant to a written agreement that establishes requirements respecting confidentiality, security, permitted use, retention, disposal, access restrictions, and the prohibition of re-identifying individuals.

8.9. Nothing in this Policy restricts Greenview from publishing reports, summaries, statistics, research findings, performance measures, or other information containing non-personal data in aggregate or statistical form where an individual cannot reasonably be identified.

9. COUNCIL RESPONSIBILITIES

9.1. Approves this Policy and provides governance oversight for privacy and information management practices.

10. ADMINISTRATION RESPONSIBILITIES

10.1. The CAO ensures organizational compliance with applicable privacy legislation and supports implementation of this Policy.

10.2. The Records and Information Coordinator oversees privacy and information management practices, privacy impact assessments, compliance monitoring, privacy incident management, training, awareness, and organizational privacy governance activities.

10.3. Managers and Supervisors ensure employees follow this Policy and implement appropriate safeguards within their departments and operations.

10.4. Employees, Contractors, and Authorized Users protect personal information, access information only as required for authorized duties, and comply with this Policy and all related procedures.



- 10.5. Information Technology Services implements and maintains technical safeguards to protect personal information and supports secure information systems and access controls.
- 10.6. Third-Party Service Providers must comply with privacy, confidentiality, security, and information management requirements established by Greenview and applicable agreements.