

## POLICY 25-16

## PRIVACY

DATE OF ADOPTION:	August 12, 2025	MOTION NUMBER:	25/08/109
DATE OF AMENDMENT:		DEPARTMENT:	Administration

## PURPOSE

To protect the privacy and confidentiality of Personal Information that is in the custody or under the control of the Town of Vermilion in accordance with the Access to Information and Protection of Privacy Acts, as amended from time to time.

## DEFINITIONS

**CAO** is the Chief Administrative Officer for the Town of Vermilion.

**Collection** means to gather, acquire, receive or obtain Personal Information. It includes activities where individuals respond through interviews, questionnaires, surveys, polling or by completing forms. The Collection may be in writing, audio, or videotaping, electronic data entry or other such means.

**Councillor** is an elected official for the Town of Vermilion.

**Disclosure** means to release, transmit, reveal, expose, show, provide copies of, tell the contents of, or give Personal Information by any means to an individual. It includes oral transmission of information by phone, in person, on paper, electronic transmission, data transfer, on the internet or any other format.

**Employee** is an employee of the Town of Vermilion.

**Employer** is the Town of Vermilion.

**Member of Council** is an individual elected to office pursuant to the Municipal Government Act (MGA) who serves as an elected official for the Town of Vermilion.

**Personal Information** is any information about an individual. This includes, without limitation, names, telephone numbers and addresses, age, sex, sexual orientation, marital status, family status, race, nationality, ancestry, or place of origin, colour, religious or political beliefs, fingerprints, other biometric information, information about health and health care history, education, financial activities, employment or criminal history, personal opinions or views of the individual, views or opinions of another person about the individual, and tax information.

**Record** is information in any form and includes notes, images, audiovisual recordings, letters, papers and any other information that is written, in print and/or photographed.

**Town** is the Town of Vermilion in the Province of Alberta.

## SCOPE

This policy applies to All Members of Council and/or all Employees of the Town of Vermilion.

TASK	TITLE OR DEPARTMENT OF PERSON RESPONSIBLE
APPROVAL OF POLICY & AMENDMENTS	Council
HANDLING INQUIRIES & COMMUNICATING POLICY	Chief Administrative Officer
MONITORING REVIEWS & IMPLEMENTATION	Chief Administrative Officer

## GUIDING PRINCIPLES

- The Town recognizes that the privacy and confidentiality of Personal Information is imperative. The Town pledges to treat the Personal Information of all persons with respect and privacy and in accordance with the Access to Information and Protection of Privacy Acts.
- Administration shall ensure that Employees receive appropriate privacy training as it relates to each position that comes in contact with Personal Information.
- Employees and Members of Council shall respect the confidentiality of Personal Information and comply with their department's information control and security systems.
- The Town of Vermilion shall make all reasonable efforts to ensure that the Employees and Members of Council understand the purpose for which personal information is being collected, used and/or disclosed and the need for this collection, use and/or disclosure.
- The Town collects and maintains different types of personal information concerning Employees, including but not limited to the following:
  - Resumes and job applications;
  - References and other checks including, but not limited to driver's abstract checks and criminal record checks; screening and interview notes;

- Photographs and video;
  - Letters offering and accepting employment;
  - Payroll information including, but not limited to social insurance number, pay cheque deposit information, and RRSP/Pension information;
  - Wage and benefit information;
  - Forms relating to the application for, or in respect of changes to, employee health and welfare benefits including short and long-term disability, medical and dental care, modified work offers or employee leave, and;
  - Beneficiary and emergency contact information.
- The Town shall not, as a condition of the supply of a program, product or service, require an individual to consent to the collection, use and/or disclosure of Personal Information beyond that required to fulfill the explicitly specified and legitimate purpose.
  - The Town shall use and disclose an individual's Personal Information only:
    - For the purpose for which it was collected or for a use consistent with that purpose;
    - For other purposes for which the Town has written consent from the individual; and
    - For other purposes where the Town is required or permitted to do so by law.
  - The Town of Vermilion may use or disclose information without consent of the individual when:
    - Contacting a next of kin in the event of an emergency;
    - An emergency exists that threatens an individual's life, health or security;
    - The information is publicly available;
    - Complying with valid legal processes such as search warrants, subpoenas or court orders;
    - The organization has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial, or foreign law and information is used for that investigation;
    - The information is for statistical or research;
    - Necessary to protect the mental or physical health or safety of any individual;
    - Providing a routine release of information when the information is a statutory requirement, information that is requested on a regular basis, and/or LAFOIP expectations apply to the Record of information.
  - Any written or verbal requests for access to information that is not part of a routine release shall be directed to the Chief Administrative Officer.
  - The Town shall make every effort to allow a person access to their own Personal Information to verify, update and correct it.

## **Protection and Retention of Personal Information**

- The Town shall protect Personal Information by making reasonable security arrangements. Personal Information shall be protected from unauthorized access, use, Disclosure or destruction through a system of administrative, physical, and technical controls including, but not limited to:
  - Restricting access to Personal Information that is stored in an electronic format to authorized persons by requiring login credentials;
  - Storing Personal Information in locations which are not generally accessible to members of the general public;
  - Securing the rooms and filing cabinets that contain Personal Information during those times in which an authorized person is not present.
- Collection of Personal Information shall be done in a confidential manner to minimize the risk of disclosing sensitive Personal Information to third parties.
- Any loss of Personal Information or inadvertent Disclosure of Personal Information shall, whenever possible be reported to the individual(s) whose information has been lost or disclosed.

## **ROLES & RESPONSIBILITIES**

- Employees must:
  - Report any breaches of privacy to their immediate supervisor in accordance with their applicable departmental procedures. Once reported, supervisors will confirm that a breach of privacy has occurred and will contact the Chief Administrative Officer to report the breach. Supervisors are responsible for preventing further breaches of Personal Information upon notification, including retrieval of records from an unauthorized recipient. In the event of a high-level breach, the Chief Administrative Officer will lead an official investigation.