



# Privacy Management Plan (PMP)

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Village of Glenwood

Protection of Privacy Act (PPA) – Alberta

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## **1. Purpose**

The purpose of this Privacy Management Plan (PMP) is to establish how the Village of Glenwood manages personal information in compliance with Alberta's Protection of Privacy Act (PPA).

This PMP demonstrates that the Village:

- Collects, uses, and discloses personal information lawfully
- Protects personal information from unauthorized access, use, or disclosure
- Respects the privacy rights of individuals
- Maintains documented and accountable privacy practices

This PMP is a mandatory compliance document under the PPA and applies to all Village operations.

## **2. Scope**

This PMP applies to:

- Mayor and Council of the Village of Glenwood
- Chief Administrative Officer (CAO)
- All employees (permanent, temporary, seasonal)
- Contractors, service providers, and volunteers acting on behalf of the Village

This PMP applies to all forms of personal information, including:

- Paper records
- Electronic records and databases
- Email and messaging systems
- Audio, video, and photographic records

## **3. Legislative Authority**

The Village of Glenwood collects, uses, and discloses personal information under the authority of:

- Alberta's Protection of Privacy Act (PPA)
- The Municipal Government Act
- Other applicable provincial legislation

## **4. Governance and Accountability**

### **4.1 Council**

Council:

- Approves the Privacy Management Plan and related privacy policies
- Receives personal information only when necessary to make informed decisions
- Ensures personal information is handled appropriately during council meetings

- Completes privacy training as required

Council members do not have unrestricted access to personal information.

#### 4.2 Chief Administrative Officer (CAO)

The CAO:

- Acts as the Head under the Protection of Privacy Act
- Has overall accountability for privacy compliance
- Authorizes disclosures of personal information
- Approves Privacy Impact Assessments (PIAs)
- Oversees privacy breach responses
- Ensures staff training and compliance

#### 4.3 FOIP / Privacy Coordinator

The FOIP / Privacy Coordinator:

- Administers access to information and correction requests
- Provides privacy advice to staff and council
- Maintains privacy documentation, logs, and records
- Coordinates Privacy Impact Assessments
- Manages privacy breach documentation and reporting

#### 4.4 Employees and Authorized Users

All employees and authorized users:

- Access personal information only on a need-to-know basis
- Follow all privacy policies and procedures
- Safeguard personal information in their care
- Report suspected privacy breaches immediately

Failure to comply may result in disciplinary action.

## 5. Personal Information Inventory

The Village of Glenwood maintains a documented inventory of personal information, including:

- Type of information collected
- Legal authority for collection
- Purpose of collection
- Storage location and format
- Access controls
- Retention period
- Disposal method

Examples include:

- Utility billing and tax records
- Bylaw enforcement and complaint files
- Resident correspondence
- Employment and payroll records

The inventory is reviewed and updated regularly.

## **6. Collection of Personal Information**

The Village collects personal information only when:

- It is necessary to carry out a lawful municipal function
- Collection is authorized by the PPA or another enactment

Where practicable, personal information is collected directly from the individual.

At the time of collection, individuals are informed of:

- The purpose of collection
- The legal authority
- A Village contact for questions or concerns

The Village follows a data minimization approach.

## **7. Use of Personal Information**

Personal information is used only:

- For the purpose for which it was collected
- For a purpose directly related and reasonable
- Where authorized by law or consent

Secondary or unrelated use is prohibited.

## **8. Disclosure of Personal Information**

The Village discloses personal information only when:

- The individual has provided consent
- Disclosure is required or authorized by law
- Disclosure is necessary to carry out a municipal function

All disclosures:

- Are limited to the minimum information necessary
- Are purpose-specific
- Are documented where appropriate

Casual or informal disclosures are prohibited.

## **9. Privacy Impact Assessments (PIAs)**

### 9.1 When a PIA is Required

A Privacy Impact Assessment must be completed before:

- Implementing new programs or services
- Introducing new technology or software systems
- Sharing personal information in new or expanded ways
- Collecting sensitive or high-risk personal information
- Outsourcing services involving personal information

### 9.2 PIA Process

Each PIA will:

1. Describe the initiative
2. Identify personal information involved
3. Assess privacy risks
4. Identify mitigation measures
5. Be reviewed and approved by the CAO
6. Be retained as a compliance record

No initiative may proceed without CAO approval of the PIA.

## **10. Safeguards and Security**

The Village applies reasonable safeguards appropriate to the sensitivity of the personal information.

### 10.1 Physical Safeguards

- Locked filing cabinets
- Restricted office access
- Secure disposal of records

### 10.2 Administrative Safeguards

- Role-based access controls
- Written policies and procedures
- Confidentiality agreements
- Mandatory privacy training

### 10.3 Technical Safeguards

- Password-protected systems

- Approved software and systems only
- Secure backups
- Controlled user access

## **11. Access to Information and Correction Requests**

Individuals have the right to:

- Request access to their personal information
- Request correction of inaccurate information

The Village:

- Responds within legislated timelines
- Documents all decisions
- Applies exemptions narrowly and lawfully

Requests do not need formal or legal language to be valid.

## **12. Privacy Breach Management**

### 12.1 Definition of a Privacy Breach

A privacy breach includes:

- Unauthorized access to personal information
- Unauthorized disclosure of personal information
- Loss of personal information

### 12.2 Breach Response Procedure

- Immediate containment of the breach
- Notification to the CAO and Privacy Coordinator
- Risk and impact assessment
- Notification to affected individuals where required
- Notification to the Office of the Information and Privacy Commissioner (OIPC) where required
- Documentation of the incident and corrective actions

All breaches are logged and reviewed.

## **13. Service Providers and Contractors**

The Village remains accountable for personal information handled by third parties.

All contracts involving personal information must include:

- Limits on use and disclosure
- Safeguard requirements

- Breach reporting obligations
- Data return or secure destruction requirements
- Audit or compliance rights

## **14. Records Management and Retention**

Personal information is:

- Retained only as long as necessary
- Managed in accordance with approved retention schedules
- Securely destroyed when retention periods expire

Over-retention is treated as a privacy risk.

## **15. Training and Awareness**

The Village provides:

- Privacy training for new council members and staff
- Ongoing refresher training
- Role-specific guidance as required

Training completion is documented.

## **16. Monitoring, Review, and Continuous Improvement**

The PMP is:

- Reviewed regularly
- Updated following privacy incidents or legislative changes
- Audited for effectiveness
- Reported to Council as appropriate

## **17. Approval and Authority**

This Privacy Management Plan is approved by Council resolution of the Village of Glenwood.

Resolution Number: \_\_\_\_\_

Effective Date: \_\_\_\_\_

Review Cycle: Every two to three years or sooner if required

### **Final Statement**

The Village of Glenwood is committed to protecting personal information and maintaining public trust. Privacy protection is a core responsibility of municipal governance and administration under Alberta's Protection of Privacy Act.