

# SUMMER VILLAGE OF CASTLE ISLAND AGENDA

Thursday, June 15<sup>th</sup>, 2026  
Wildwillow Administration Office and via zoom  
2317 Township Road 545 Lac Ste. Anne County

1.	<b><u>Call to Order</u></b>		
2.	<b><u>Agenda</u></b>	a)	June 15 <sup>th</sup> , 2026 Regular Council Meeting  <i>(that Council approve as is or as amended)</i>
3.	<b><u>Minutes:</u></b> Pages 1-5	a)	Monday, April 20 <sup>th</sup> , 2026 Regular Council Minutes  <i>(approve as presented or with amendments)</i>
4.	<b><u>Public Hearings/ Appointments:</u></b>		N/A
5.	<b><u>Action Items</u></b> Bylaw 2026-04, Council Procedural Bylaw Pages 6-23	a)	Bylaw 2026-04, Council Procedural Bylaw – as part of the Municipal Accountability Program review in one of our other Summer Villages, a review of Council Procedural Bylaws as not meeting legislative requirements with regard to the Public making submissions to Regular Council meetings, Special Council Meetings and/or Public Hearings. Please refer to Clause 45 on pages 6 & 7. These additions have been vetted by Municipal Affairs and the Bylaw now meets legislative requirements. We are requesting all 3 readings of this Bylaw.  <i>(that Bylaw 2026-04 to regulate the procedures and conduct of Council and Council Committee meetings, be given first reading (as presented or amended))</i>  <i>(that Bylaw 2026-04 be given 2<sup>nd</sup> reading)</i>  <i>(give unanimous consent to Bylaw 2026-04 to consider third reading in the same meeting)</i>  <i>(that Bylaw 2026-04 be given 3<sup>rd</sup> and final reading presented and further authorize the Mayor and Chief Administrative Officer to execute same, effective this date, June 15<sup>th</sup>, 2026)</i>
	Pages 24-26		Access to Information Act (How to request and share information ATIA) and Protection of Privacy Act (Collecting and Protecting Information POPA) – please refer to the attached information. Unfortunately, the new

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<p>Bylaw 05-26 Access to Information Bylaw Pages 27-29</p>	<p>b)</p>	<p>rules will create administrative burden and will reduce the amount and types of information that we can publish on our website. Moving forward, agenda packages will no longer be publicly available, just the agenda. Under separate cover is the Privacy Management Plan that needs to be approved. This will be discussed in Closed Session.</p> <p>Bylaw 05-26, Access to Information Bylaw:</p> <p><i>(that Council gives first reading to Bylaw 05-26, being the Access to Information Bylaw, as presented)</i></p> <p><i>(that Council gives second reading to Bylaw 05-26, being the Access to Information Bylaw, as presented)</i></p> <p><i>(that Council gives unanimous consent for Bylaw 05-26, being the Access to Information Bylaw, to receive third and final reading as presented)</i></p> <p><i>(that Council gives third and final reading to Bylaw 05-26, being the Access to Information Bylaw as presented and further authorize the Mayor and Chief Administrative Officer to execute same, effective this date, June 15<sup>th</sup>, 2026)</i></p>
<p>Bylaw 06-26 Protection of Privacy Bylaw Pages 30-32</p>	<p>c)</p>	<p>Bylaw 06-26, Protection of Privacy Bylaw</p> <p><i>(that Council gives first reading to Bylaw 06-26, being the Protection of Privacy Bylaw, as presented)</i></p> <p><i>(that Council gives second reading to Bylaw 06-26, being the Protection of Privacy Bylaw, as presented)</i></p> <p><i>(that Council gives unanimous consent for Bylaw 06-26, being the Protection of Privacy Bylaw, to receive third and final reading as presented)</i></p> <p><i>(that Council gives third and final reading to Bylaw 06-26, being the Protection of Privacy Bylaw as presented and further authorize the Mayor and Chief Administrative Officer to execute same, effective this date, June 15<sup>th</sup>, 2026)</i></p>

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	Page 33	d)	<p>Capital Region Assessment Services Commission (CRASC) – as a participant in the Assessment Review Board (ARB) program, Council is required to appoint an additional member that was recently certified as an ARB member for 2026, as listed below (as per the <i>Municipal Government Act, MGA</i>) section 454.</p> <p>Certified Panelist: Braden Lanctot</p> <p><i>(authorize the appoint of Capital Region Assessment Services Commission's (CRASC's) Assessment Review Board (ARB) Certified Panelist, Braden Lanctot as a part of the Assessment Review Board program)</i></p>
	<p><b><u>DRAFT POLICY</u></b> <b><u>A-ADM-</u></b> <b><u>ASSETMGMT,</u></b> <b><u>Asset Management</u></b> <b><u>Policy</u></b> Pages 34-36</p>	e)	<p>Asset Management Levels of Service and Asset Management Policy - as you know, Castle Island agreed to participate in the proposed Matthewson &amp; Co. Asset Management Project, along with other Summer Villages in the area. Administration has been working through the steps required and have now completing the Levels of Service Worksheet.</p> <p>As we understand it, we are now required to pass an Asset Management Policy for the Summer Village. Attached is a draft copy of the Policy for Council consideration.</p> <p><i>(that Council approve Policy A-ADM-ASSETMGMT as presented)</i></p> <p>Or</p> <p><i>(some other direction as given by Council at meeting time)</i></p>
		f)	
6.	<b><u>Council Reports</u></b>	a) b) c)	<p>Mayor Deputy Mayor Councillor</p> <p><i>(that Council accept the Council Reports for information)</i></p>
7.	<b><u>Development Permits</u></b>	a)	N/A

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8.	<b><u>Inspection Group Reports</u></b>	a)	N/A
9.	<b><u>Financial</u></b> <i>Forwarded under separate cover</i>	a)	Income and Expense Statement – May 31 <sup>st</sup> , 2026 and Bank Balances as at May 31 <sup>st</sup> , 2026.  <i>(that the May 31<sup>st</sup>, 2026 Income and Expense Statement and the May 31<sup>st</sup>, 2026 Bank Balances, be accepted for information)</i>
10	<b><u>Correspondence</u></b> <i>Page 37</i>	a)	Lac Ste. Anne County – May 15 <sup>th</sup> , 2026 letter advising that County Council is removing their representation from the Ste. Anne Regional Lake Use Committee.
		b)	
		c)	
11	<b><u>CAO Report</u></b>	a) b)	To Do List, April 20 <sup>th</sup> , 2026  <i>(that the CAO report be accepted as presented)</i>
12	<b><u>Confidential Items/Closed Meeting</u></b> <i>Privacy Management Plan (Draft) – ATIA Section 28 (Local Public Body Confidences) and Section 32, (Privileged Information Pages 38-110</i>	a)	Pursuant to Access to Information (ATIA) Section 28 (Local Public Body Confidences) and Section 32, (Privileged Information) that Council go into a Closed Session at _____ to discuss the following:  Privacy Management Plan  <i>(that Council adopts the Privacy Management Plan, 2026 edition as presented this 15<sup>th</sup> day of June, 2026 and authorize Administration to begin the implementation of the same as a course of regular business as discussed)</i>  <i>(that Council appoint Chief Administrative Officer, Wendy Wildman as Head of the Public Body under the provisions of the Privacy Management Act, the appointment of Wendy Wildman as the designated Privacy Officer and Access to Information Officer for the Summer Village of Birch Cove, effective this 15<sup>th</sup> day of June, 2026)</i>  Or

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			<i>(some other direction as given by Council at meeting time)</i>
<b>14</b>	<b><u>Adjournment</u></b>		

Next Meetings: June 27<sup>th</sup>, 2026 – Summer Villages Lac Ste Anne County East – Alberta Beach Seniors – 9:00 a.m.

August 17<sup>th</sup>, 2026 – Regular Council Meeting

October 19<sup>th</sup>, 2026 – Regular Council Meeting

December 21<sup>st</sup>, 2026 – Regular Council Meeting

SUMMER VILLAGE OF CASTLE ISLAND  
REGULAR COUNCIL MEETING MINUTES  
MONDAY, APRIL 20<sup>TH</sup>, 2026  
SUMMER VILLAGE ADMINISTRATION OFFICE  
2317 TOWNSHIP ROAD 545, LAC STE. ANNE COUNTY & VIA ZOOM

	<b>PRESENT</b>	<p>Mayor Calvin Smith  Deputy Mayor: Jeff Elkow (regrets)  Councillor: Gary Guy</p> <p>Administration: Wendy Wildman, Chief Administrative Officer  Diane Wannamaker, Executive Assistant  Finance Officer, Shelley Vaughan</p> <p>Public attendance (in person): 0</p>
1.	<b>CALL TO ORDER</b>	Mayor Smith called the meeting to order at 9:06 a.m.
2.	<b>AGENDA</b> 26-23	<p><b>MOVED</b> by Mayor Smith that the April 20<sup>th</sup>, 2026 agenda be approved with the following addition:</p> <p>5.i) Emergency Management</p> <p style="text-align: right;"><b>CARRIED</b></p>
3.	<b>MINUTES</b> 26-24	<p><b>MOVED</b> by Mayor Smith that the minutes of the January 20<sup>th</sup>, 2026 Regular Council Meeting be approved as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
4.	<b>PUBLIC HEARINGS/ APPOINTMENTS</b> <i>Colton Kerswell, Seniuk &amp; Marcato</i>  26-25	<p>9:07 a.m. Colton Kerswell, Seniuk &amp; Marcato arrived for the meeting to present the Draft 2025 Financial Statements.</p> <p><b>MOVED</b> by Mayor Smith that the 2026 Draft Audited Financial Statements for the Summer Village of Castle Island presented by Colton Kerswell from Seniuk &amp; Marcato, Chartered Professional Accountants be approved as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
5.	<b>ACTION ITEMS</b> 26-26	<p><b>MOVED</b> by Mayor Smith that the 2026 Draft Operating Budget for the Summer Village of Castle Island be approved as presented, with a 1.6% increase in municipal tax dollars collected.</p> <p style="text-align: right;"><b>CARRIED</b></p> <p>Finance Officer, Shelley Vaughan left the meeting at 9:20 a.m.</p>

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26-27	<p><b>MOVED</b> by Mayor Smith that Bylaw 2026-02, being a Bylaw to set the Special Tax required for Fire Protection and Recreational Services in the Summer Village of Castle Island for the 2026 taxation year be given 1<sup>st</sup> reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-28	<p><b>MOVED</b> by Mayor Smith that 2026-02 be given second reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-29	<p><b>MOVED</b> by Mayor Smith that Unanimous Consent be given to proceed to third reading of Special Tax Bylaw 2026-02 in one sitting.</p> <p style="text-align: right;"><b>CARRIED UNANIMOUSLY</b></p>
26-30	<p><b>MOVED</b> by Mayor Smith that Special Tax Bylaw 2026-02 be given third and final reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-31	<p><b>MOVED</b> by Mayor Smith that Bylaw 2026-03, being a Bylaw to set the rates of taxation imposed for the municipal taxes payable in the Summer Village of Castle Island for the 2026 taxation year be given 1<sup>st</sup> reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-32	<p><b>MOVED</b> by Mayor Smith that 2026-03 be given second reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-33	<p><b>MOVED</b> by Mayor Smith that Unanimous Consent be given to proceed to third reading of Bylaw 2026-03, Taxation Bylaw in one sitting.</p> <p style="text-align: right;"><b>CARRIED UNANIMOUSLY</b></p>
26-34	<p><b>MOVED</b> by Mayor Smith that Taxation Bylaw 2026-03 be given third and final reading as presented.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-35	<p><b>MOVED</b> by Councillor Guy that Council approve the attendance of those members of Council that wish to attend the West Interlake District Water Commission (WILD) 2026 Annual Meeting on May 4<sup>th</sup>, 2026 at the Alberta Beach Seniors Centre at 6:00 p.m.</p> <p style="text-align: right;"><b>CARRIED</b></p>
26-36	<p><b>MOVED</b> by Mayor Smith that the 2026 Association of Summer Village of Alberta Conference and General Meeting on October 16<sup>th</sup> and 17<sup>th</sup>, 2026 in Edmonton, Alberta be accepted for information.</p>



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	<p>26-37</p> <p>26-38</p> <p>26-39</p>	<p><b>MOVED</b> by Mayor Smith that the 2026 Alberta Municipalities Convention on September 23<sup>rd</sup> – 25<sup>th</sup>, 2026 at the Edmonton Convention Center be accepted for information.</p> <p><b>MOVED</b> by Councillor Guy that those Council members that wish to participate in the Privacy Management Training for Elected Officials session scheduled on May 5<sup>th</sup>, 2026 (via in person and zoom options) be authorized to do so.</p> <p><b>MOVED</b> by Mayor Smith that the information provided by Mayor Smith regarding the Emergency Management program and discussion with Lac Ste. Anne County regarding the program be accepted as presented and further, that Administration follow up with an email to Lac Ste. Anne County Director of Emergency Management, Randy Schroeder and Deputy Director of Emergency Management, Carole Peacock regarding the Summer Village of Castle Island coming under the umbrella of the County Emergency Management program.</p>	<p><b>CARRIED</b></p> <p><b>CARRIED</b></p> <p><b>CARRIED</b></p> <p><b>CARRIED</b></p>
<p>6.</p>	<p><b>COUNCIL REPORTS</b> 26-40</p>	<p><b>MOVED</b> by Mayor Smith that the Council reports be accepted as presented.</p>	<p><b>CARRIED</b></p>
<p>7.</p>	<p><b>DEVELOPMENT PERMITS</b></p>	<p>N/A</p>	
<p>8.</p>	<p><b>INSPECTION GROUP PERMITS</b></p>	<p>N/A</p>	
<p>9.</p>	<p><b>FINANCIAL</b> 26-41</p>	<p><b>MOVED</b> by Mayor Smith that the March 31<sup>st</sup>, 2026 Income and Expense Statement as presented on the 2026 Draft Operating Budget and March 31<sup>st</sup>, 2026 Bank Statement Balance be accepted for information.</p>	<p><b>CARRIED</b></p>
<p>10.</p>	<p><b>CORRESPONDENCE</b> 26-42</p>	<p><b>MOVED</b> by Mayor Smith that the Correspondence and Information items be accepted for information as follows:</p>	

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		<ul style="list-style-type: none"> <li>➤ Fire Rescue International – letter of February 19<sup>th</sup>, 2026 advising of an increase in hourly rates</li> <li>➤ Parkland County – February 11<sup>th</sup>, 2026 letter to the Village of Alberta Beach advising that operational demands prevent Parkland County to consider entering into a Mutual Aid Agreement (MAA) to support emergency fire and rescue response outside of Parkland County's boundaries</li> <li>➤ Sturgeon County – request for Mutual Aid Agreement letter from Mayor Elwood, Village of Alberta Beach and response advising that any mutual aid involving Sturgeon County must be initiated through Lac Ste. Anne County</li> <li>➤ Alberta Municipalities – member webinars “what we heard” report on Federal Budget &amp; Funding Infrastructure for Housing, FCSS and Prevention and Police Funding Model</li> <li>➤ February 27<sup>th</sup>, 2026 ABMunis Report on the Government of Alberta’s 2026-27 Budget and News Release – Albertans’ Property Taxes will go up because of budget 2026</li> <li>➤ Lac Ste. Anne Foundation – December 5<sup>th</sup>, 2025 Board Meeting Minutes</li> <li>➤ Rates for Fire Calls – effective April 1<sup>st</sup>, 2026</li> <li>➤ Alberta Summer Village Association – collective feedback submission to Alberta Municipal Affairs on proposed changes to the Local Authorities Election Act (LAEA), recognizing the unique demographics of Summer Villages as pertaining to elections.</li> <li>➤ Asset Management Monthly Progress Report for February, 2026</li> </ul> <p style="text-align: right;"><b>CARRIED</b></p>
11.	<b>CAO REPORT</b> 26-43	<p><b>MOVED</b> by Mayor Smith that the CAO report be accepted for information.</p> <p style="text-align: right;"><b>CARRIED</b></p>
12.	<b>CLOSED SESSION</b>	N/A
13.	<b>ADJOURNMENT</b>	Mayor Smith declared the meeting adjourned at 9:50 a.m.

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2317 TOWNSHIP ROAD 545, LAC STE. ANNE COUNTY & VIA ZOOM

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Mayor, Calvin Smith

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Chief Administrative Officer, Wendy Wildman

**A BYLAW OF THE SUMMER VILLAGE OF CASTLE ISLAND IN THE  
PROVINCE OF ALBERTA TO REGULATE THE PROCEDURE AND CONDUCT  
OF COUNCIL AND COUNCIL COMMITTEE MEETINGS.**

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**WHEREAS**, the Council of the Summer Village of Castle Island considers it expedient and desirable for effective governance to regulate the procedure and conduct of Council, Councillors and others attending Council and Council committee meetings in the Summer Village of Castle Island;

**AND WHEREAS**, the Council of the Summer Village of Castle Island recognizes the need to promote effective participation in local governance by all stakeholders, including Councillors, administration, formal delegations before council and committees, and the public in general, and therefore is agreeable to accommodating electronic means of participation herein, in accordance with Section 199 of the Municipal Government Act;

**NOW THEREFORE**, the Council of the Summer Village of Castle Island hereby enacts as follows:

**Citation**

1. This Bylaw may be cited as the "The Procedural Bylaw".

**Definitions**

2. In this Bylaw:
  - a) "CAO" means the Chief Administrative Officer or their delegate, for the Summer Village of Castle Island.
  - b) "Closed Meeting" means a part of the meeting closed to the public at which no resolution or Bylaw may be passed, except a resolution to revert to a meeting held in public.
  - c) "Council" means the Mayor and Councillors of the Summer Village of Castle Island for the time being elected pursuant to the provisions of the *Local Authorities Election Act* and the *Municipal Government Act* whose term is unexpired, who have not resigned and who continue to be eligible to hold office under the terms of the related provincial legislation;
  - d) "Delegation" means any person that has permission of Council or the CAO to appear before Council or a committee of Council to provide pertinent information and views about the subject before Council or Council committee.
  - e) "Deputy Mayor" means the member selected by Council to preside at a meeting of Council in the absence of the Mayor;
  - f) "Electronic Means" shall be defined in the *Municipal Government Act*, Section 199(1)(a), specifically meaning an electronic or telephonic communication method that enables all persons attending a meeting to hear and communicate with each other during the course of the meeting.

- g) "Access to Information" refers to the *Access to Information Act, SA 2024*
- h) "Mayor" shall mean the member selected by Council at the Organizational meeting to hold that position and to preside at a meeting of Council;
- i) "Member" means a Councillor or person at large appointed by Council to a committee of Council.
- j) "Meetings" means meetings of Council and Council committees and in keeping with the interpretation of Section 199(1)(b) of the *Municipal Government Act*, shall include hearings.
- k) "Municipality" means the Municipality of the Summer Village of Castle Island, a Municipal Corporation of the Province of Alberta and includes the area contained within the boundaries of the Municipality;
- l) "Protection of Privacy Act" refers to the *Protection of Privacy Act, SA 2024*

### **Application**

- 3. This Bylaw applies to all members attending meetings of Council and committees established by Council of the Municipality;

### **Severability**

- 4. If any portion of this Bylaw is declared invalid by a court of competent jurisdiction, then the invalid portion must be severed and the remainder of the Bylaw is deemed valid;

### **General**

- 5. The General Duties of Council shall adhere to the duties and responsibilities contained within Section 153 of the MGA as set out in Appendix A and as amended from time to time.
- 6. The General Duties of the Chief Elected Official shall adhere to the duties and responsibilities contained within Section 154 of the MGA as set out in Appendix B.
- 7. No Member of Council shall direct or interfere with the performance of any work for the Municipality, and shall seek all information through the office of the Chief Administrative Officer or their designate.
- 8. A breach of the Section of the Bylaw by any Member of Council may place the Member of Council in the position of censure by Council.
- 9. Public Hearings, held with respect to Bylaws, when required or requested by Council, will be held prior to second reading. Public Hearings required

under Part 17 of the *Municipal Government Act* shall be accessible via Electronic Means and shall be conducted in accordance with the procedures set out in Appendix C.

### Meetings

10. The regular meetings of Council shall be established by resolution of Council at its annual organizational meeting.
11. Special meetings of Council shall be established as required by Council according to the provisions of the *Municipal Government Act* and the public shall be given notice.
12. Council by resolution may establish other Council meeting dates.
13. The meetings of Council committees shall be established by resolution of each committee and the public must be given notice or advertised as required by the provisions of the *Municipal Government Act*.
14. Regular meetings of Council shall begin at 9:00 a.m.
15. The times for the beginning of Council committee meetings shall be set by resolution of each committee.
16. As soon after the hour of which the meeting was called, and a quorum is present, the Mayor shall take the chair and call the meeting to order.
17. In a case where the Mayor is not in attendance within fifteen (15) minutes after the hour of which the meeting was called, and a quorum is present, the Deputy Mayor shall call the meeting to order.
18. If a quorum is not present within thirty (30) minutes after the time fixed for the meeting, the CAO shall record the names of the members present and the meeting shall stand adjourned until the next meeting;
19. No person, persons or entity other than the Summer Village of Castle Island may record in whole or in part any meeting of Council or Council Committee using audio, video or any other recording means.
20. Should the Summer Village of Castle Island deem it appropriate to record a Council or Council Committee meeting, all parties present at the meeting must be verbally notified immediately prior to the start of the recording.



**Conduct of Meetings**

22. Each member or delegate, as the case may be, shall address the Chair but shall not speak until recognized by the Chair.
23. The Presiding Officer with the approval by resolution of the members, may authorize a person in the public gallery to address members only on the topic being discussed at that time and within the time limits specified by the Presiding Officer.
24. A resolution does not require a seconder.
25. A resolution may be withdrawn at any time before voting subject to no objection from any member, as the case may be.
26. The following resolutions are not debatable by members:
  - a) adjournment
  - b) to take a recess
  - c) question of privilege
  - d) point of order
  - e) to limit debate on a matter before members
  - f) on division of a question
  - g) postpone the matter to a certain time
  - h) to table the matter
27. The Mayor or Presiding Officer may enter into any debate and make resolutions in the same manner as any member without relinquishing the chair.
28. Where an issue has been brought before Council, the same issue cannot be tabled more than three times.
29. Where a matter or issue has been brought before Council, the same matter or issue cannot be heard more than three times unless there is new information to be presented about the issue or matter.
30. Where a question under consideration contains distinct propositions, the vote upon each proposition shall be taken separately when any member so requests or when the Presiding Chair so directs.
31. Whenever the Presiding Officer is of the opinion that a motion is contrary to the rules and privileges of Council, he/she shall inform the member thereof immediately, before putting the question, and shall cite his/her reasons applicable to the case without argument or comment.
32. The Mayor or Presiding Officer shall preserve order and decorum and shall decide questions of order, subject to an appeal to the Council by resolution. Decisions of the Presiding Officer shall be final unless reversed or altered by a

majority vote of members present.

33. In all cases not provided for in the proceedings of the Council, a two-thirds majority of Council shall determine to uphold the ruling of the Presiding Officer or not as the case may be.
34. When a motion has been made and is being considered by Council no other motion may be made and accepted, except:
  - a) a motion to refer the main question to some other person or group for consideration
  - b) a motion to amend the main question
  - c) a motion to table the main question
  - d) a motion to postpone the main question to some future time
  - e) a motion to adjourn the meeting, provided that a motion to table shall not be debated except as to the time when the matter will again be considered.
35. After any question is finally put by the Mayor or other Presiding Officer no member shall speak to the question, nor shall any other motion be made until after the result of the vote has been declared. The decision of the Mayor or the Presiding Officer as to whether the question has been finally put shall be conclusive.
36. Any member of the Council can call for a recorded vote, the names of those who vote for and those who vote against the motion shall be entered in the minutes. A request for a recorded vote must precede the voting on a motion.
37. Voting on all matters shall be done by raising of the hand in such a clear manner that they may be easily counted by the Presiding Officer. In the case of a meeting by Electronic Means voting may be done verbally.
38. Council may adjourn from time to time to a fixed future date any regular or special meeting of Council that has been duly convened but not terminated. The object of adjourning is to finish the business that the meeting was called to transact in the first place, but which has not been completed;
39. As per Section 197 of the *Municipal Government Act*, a formal motion will be made to go to a "Closed Meeting" session, identifying the relevant Sections(s) of the of the *Freedom of Information and Privacy Act*. When a meeting is closed to the public, no resolution or Bylaw may be passed at the meeting, except a resolution to revert to an open meeting of a Council or Council Committee held in public. No minutes, notes, or recordings of the discussions will take place in a Closed Meeting session and any printed reports provided to Council will be retrieved by the CAO. After the closed meeting discussions are completed, any members of the public who are present outside the meeting room must be notified that the meeting is now open to the public, and a reasonable amount of time must be given for those members of the public to return to the meeting

before it continues. Where a Council or Council Committee closes all or part of a meeting to the public, the Council or Council Committee may allow one or more other persons to attend, as it considers appropriate, and the minutes of the meeting must record the names of those persons in attendance and, if applicable, the reason for their attendance.

### **Delegations**

40. A person or a representative of any delegation or group of persons who wish to bring any matter to the attention of Council, or who wish to have any matter considered by Council shall address a letter or other written communication to the Council outlining the subject to be discussed. The letter shall be signed by the correct name of the writer; the address of the writer and delivered or mailed to the CAO. The letter must arrive at least at 1:00 p.m. on a business day at least five (5) days immediately preceding the meeting at which it is to be presented. If the person wishes to appear before Council on the matter it shall be stated in the letter.
41. Delegates shall be granted a maximum of fifteen (15) minutes to present the matter outlined in the letter. Where the Presiding Officer determines that additional time shall be granted to a delegation the length of the extension shall be specified and the Presiding Officer may limit the time. The number of times that a member or delegate may speak on the same question or resolution is three (3) times, having due regard to the importance of the matter.
42. Delegations that have not submitted a letter in accordance with Section 40 may be granted a brief opportunity to outline the matter they wish to present to Council, and following that outline, the Presiding Officer and members shall determine if the delegation is to be granted time under Section 41 to present the matter outlined.
43. Members of the public who constitute the gallery in the Council Chambers during a Council meeting may not address Council without permission of the Council, shall maintain order and quiet, and shall not applaud or otherwise interrupt any speech or action of members of Council. Should the behaviour of a member or members of the gallery become unruly, they shall be required to leave the meeting immediately.
44. Council shall hear all delegations that have brought their items of business onto the agenda in the order in which they are placed on the agenda or the order as may be changed by a majority vote of members present. All rules of Council in this Bylaw shall apply to each and every member of the delegation. Delegations shall have fifteen (15) minutes for presentation;
45. When making submissions for a Regular or Special Council Meeting, or Public Hearing:

a) Regular or Special Council Meeting: members of the public may make submissions by forwarding same via email or mail to the administration office, as per the timelines outlined in this Bylaw, or to the Chair or administration at the time of the meeting if deemed acceptable as per the Chair of the meeting.

b) Public Hearing: members of the public may make submissions by forwarding same via email or mail to the administration office, or by dropping off at the administration office, prior to the Public Hearing, or by handing to the Chair or administration at the time of the Public Hearing.

**Provision for Attendance and Participation by Electronic Means**

46. In accordance with the provisions of Section 199(2) of the *Municipal Government Act*, Council herein provides that meetings of Council, including Committee meetings and Public Hearings, may be conducted by Electronic Means, when deemed necessary to do so for the effective and expedient governance of the municipality and engagement with the public, at the discretion of Council. Further, in accordance with Section 199(2.1) of the *Municipal Government Act*, all Public Hearings required under Part 17 of the Act shall be conducted via Electronic Means. Public Hearings, other than those required by Part 17 of the Act, may be conducted via Electronic Means.

a) In exercising its discretion, Council may provide for the following meetings inclusive of Electronic Means:

- A full virtual meeting, by which all parties that are, or may wish to be, participating in the meeting shall have a common point of access to the virtual meeting through approved electronic means; or,
- A hybrid virtual meeting, at which some of the participants may be authorized to participate through approved electronic means. The availability of a hybrid virtual meeting does not create an obligation, nor does it restrict the ability, to provide virtual access to the general public as in the hybrid model the council chamber remains an effective point of access for the general public.

b) In exercising its discretion, Council shall prioritize the use of hybrid, rather than full, virtual meetings such that where possible the use of electronic means is limited to use by those active parties in the meeting, including Councillors, administration and formal delegations who cannot be in physical attendance.

c) Except as required by Section 199(2.1) of the *Municipal Government Act*, Electronic Means shall be used only when and where the location of remote access is able to support its use. The ability to access remotely is not a guarantee

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that access will be assured or that business will be detained for input by those with an intermittent connection.

- d) A Councillor shall be deemed present for the meeting for the duration of the meeting, in all or in portions, for which their connection is active.
- e) The Presiding Officer shall, on the Call to Order of the meeting, declare to the meeting that there is, or may be, participation by Electronic Means, and shall ask the recording secretary to confirm any virtual attendees by seeking confirmation of:
  - Those voting members or Councillors present;
  - Those administration present;
  - Those delegations that may be present; and
  - The general count of those public present.

47. In providing for Electronic Means, the Council authorizes the following electronic means for virtual participation in meetings:

- a) Telephone participation, both traditional landline and cellular mobile participation;
- b) Personal or Work Computer or Tablet, via virtual participation applications or programs initiated by the Municipality;
- c) Other means as may become commonly accepted and deemed safe by the Municipality as technology advances.
- d) The access codes or numbers for participating electronically shall be distributed along with the agenda of the meeting in the same manner by which the agenda is circulated (email, website, and/or contained on the physical copy of the agenda).

48. In participating by Electronic Means, a Councillor shall be required to make their presence known in accordance with the following:

- a) On initially joining the meeting, shall declare their full name to the acknowledgement of the Chair of the meeting, and if possible confirm their participation by live video display.
- b) When participating making a motion, or participating in debate, the virtually attending member shall verbally request the floor from the Chair, and may be assisted in garnering the attention of the Chair by the moderator or recording secretary or other administrative officer present in the meeting.
- c) When speaking, and when voting on matters, the virtually attending member should, when feasible pending service connection, turn their live display video

on.

- d) In voting on a matter, the virtually attending party, or parties, shall be called on by the Chair to give their vote verbally, one at a time, following the call of the question and voting by those parties that may be attending the meeting physically.
  - e) If the matter being voted on is a question requiring a secret ballot, the virtually attending party, or parties, shall be permitted to either email or text message their ballot to the Chief Administrative Officer, or Designated Officer or Clerk, and have it received and counted as in the normal fashion. In exercising this option, virtually attending members shall be permitted not more than 5 minutes from the time voting is declared "open" by the Chair to submit their vote; late receipts will not be accepted and shall be deemed an absent vote.
  - f) When a Council member or other participant is included in a Closed Session meeting and participating by Electronic Means, the virtually attending member shall be asked to verbally confirm to the Chief Administrative Officer, or designate, that they are attending the Closed Session alone.
49. When making access by Electronic Means available to the general public:
- a) The access codes and numbers for the approved Electronic Means shall be contained within the meeting notice and agenda for the meeting and/or shall be posted on the Summer Village Website and distributed by the same means used to circulate the notice of meeting and agenda.
  - b) Except where public participation is expressly allowed, such as a Public Hearing, public participants shall be muted and may be disconnected from the meeting by the moderate of the meeting for disruptions due to noise, unauthorized comment or any disruptions which hampers the effective conduct of the meeting, at the discretion of the Chair.
  - c) Where public participation does involve receiving comment from the public, such as in a Public Hearing or open gallery provision, comments will be received verbally in a manner of order determined by the Chief Administrative Officer based first on requests to speak received before the meeting, concurrently during the meeting (for example in the "chat box" of the electronic means platform, and then finally any last comments arising from the floor. The conduct of these comments shall be respectful and follow the same decorum and process as if made in physical attendance.

### **Motion to Recess**

49. The Chair, without a Motion, may Recess the meeting for a specific period of no more than ten (10) minutes.

50. Any Councillor may move that Council Recess for a specific period.
51. After the Recess, business will be resumed at the point where it was interrupted.
52. A Recess will follow a motion to go into closed session and a Recess will precede a motion to come out of closed session;

### **Rules of Order**

53. Any matter of meeting conduct which is not herein provided for shall be determined in accordance with "Roberts Rules of Order Revised";

### **Agenda and Order of Business**

54. Prior to each meeting, the CAO shall prepare a statement of the order of business to be known as the "Agenda" of all matters to be brought before Council. To enable the CAO to do so, all documents and notice of delegation, intended to be submitted to the Council, shall be received by the CAO not later than 1:00 p.m. on a business day at least five (5) days before the meeting.
55. The CAO shall place at the disposal of each member a copy of the agenda and all supporting materials not later than 4:30 p.m. two (2) days before the meeting.
56. Where the deadlines in Section 54 and 55 are not met, the agenda and support materials shall be deemed to be acceptable when the agenda is adopted at the meeting.
57. The business intended to be dealt with shall be stated in the agenda in the following order where applicable:
  1. Call to Order
  2. Adoption of Agenda
  3. Adoption of Minutes
  4. Appointments
  5. Action Items
  6. Council Reports
  7. Development Permits
  8. Inspection Group Permits
  9. Financial
  10. Information & Correspondence
  11. CAO Report
  12. Closed Session
  13. Adjournment

58. The order of business established in Section 57 shall apply unless altered by the Presiding Officer with no objection from members, or otherwise determined by a majority vote of the members present, and the vote upon a matter of priority of business shall be decided without debate.
59. Standing Committees of Council shall be established and governed by policy or Bylaw approved by Council. Where appropriate authority is delegated to a Standing Committee, such committee and its mandate shall be established by Bylaw;

### **Recording of the Minutes**

60. The CAO may delegate any duties to a recording secretary but shall accept all responsibilities of the duties.
61. If a member of Council arrives late, leaves before the meeting is adjourned, or is temporarily absent from the meeting, it shall be so recorded in the minutes.
62. After each meeting, the CAO shall prepare a statement of what was done at the meeting which will be known as the "Minutes" of the meeting. The minutes will be the written record of the proceedings of the meeting and will be a record of what was done at the meeting, and not what was said at the meeting;

### **Bylaws**

63. Where a Bylaw is presented to Council for enactment, the CAO shall cause the number and the short title of the Bylaw to appear on the Agenda in the appropriate place.
64. Every Bylaw shall have three readings.
65. After a member has made the motion for the second reading of the Bylaw, Council may:
- a) debate the substance of the Bylaw; and
  - b) propose and consider amendments to the Bylaw.
66. A proposed amendment shall be put to a vote and if carried shall be considered as having been read a first time and incorporated in the Bylaw.
67. Unless the members present at a meeting unanimously agree that a Bylaw may be presented to Council for a third reading at the same meeting at which it has received two readings, the Bylaw shall not be given more than two readings at one meeting.
68. Where required by Provincial Statute, a Bylaw shall be advertised or submitted to the electorate for voting as set out in the relevant statutes.

69. Bylaws shall not be repealed, amended or suspended, except so far as the terms thereof themselves permit, unless it is repealed, amended or suspended by:
- a) Bylaw unanimously passed at a regular or special meeting of the Council at which all members thereof are present; or
  - b) Bylaw passed at a regular meeting of Council, pursuant to a notice in writing given and openly announced at the preceding meeting of the Council and setting out the terms of the substantial effect of the proposed Bylaw.

**Website**

- 70. Regular Council Meeting agenda and links to join the meeting via Electronic Means, as applicable, are to be posted within 2 days prior to the meeting on the Summer Village website prior to the Council meeting after it is prepared and distributed to Council.
- 71. Special Council meeting agendas will be posted on the Summer Villag website prior to the Special Council meeting after it is prepared and distributed to Council.
- 72. Unapproved meeting minutes are to be posted on the Summer Village website within 7 days of the meeting.
- 73. Approved minutes are to be posted within 3 business days of the meeting in which they were approved.
- 74. Other items will be posted on the Summer Village website as directed by the CAO or designate.

This Bylaw repeals Bylaw #2025-05

This Bylaw shall come into effect upon the third and final reading and signing of this Bylaw

**READ** a first time this 15<sup>th</sup> day of June, 2026

**READ** a second time this 15<sup>th</sup> day of June, 2026

**UNANIMOUS CONSENT** to proceed to third reading this 15<sup>th</sup> day of June, 2026

**READ** a third and final time this 15<sup>th</sup> day of June, 2026

**SIGNED** this 15<sup>th</sup> day of June, 2026

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Mayor, Calvin Smith

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Chief Administrative Officer, Wendy Wildman

**Municipal Government Act RSA 2000 Chapter M-26  
Division 9 Council Proceedings**

SUMMER VILLAGE OF CASTLE ISLAND  
APPENDIX A

Municipal Government Act Division 3  
Duties, Titles and Oaths of Councillors

General duties of Councillors  
153

Councillors have the following duties:

- (a) to consider the welfare and interests of the municipality as a whole and to bring to Council's attention anything that would promote the welfare or interests of the municipality;
- (a.1) to promote an integrated and strategic approach to intermunicipal land use planning and service delivery with neighbouring municipalities;
- (b) to participate generally in developing and evaluating the policies and programs of the municipality;
- (c) to participate in council meetings and council committee meetings and meetings of other bodies to which they are appointed by the council;
- (d) to obtain information about the operation or administration of the municipality from the chief administrative officer or a person designated by the chief administrative officer;
- (e) to keep in confidence matters discussed in private at a council or council committee meeting until discussed at a meeting held in public;
- (e.1) to adhere to the code of conduct established by the council under section 146.1(1);
- (f) to perform any other duty or function imposed on councillors by this or any other enactment or by the council.

RSA 2000 cM-26 s153;2015 c8 s17;2016 c24 s15

**Municipal Government Act RSA 2000 Chapter M-26  
Division 9 Council Proceedings**

SUMMER VILLAGE OF CASTLE ISLAND  
APPENDIX B

Municipal Government Act Division 3  
Duties, Titles and Oaths of Councillors

General duties of chief elected official  
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- (1)** A chief elected official, in addition to performing the duties of a Councillor, must:
- (a) preside when in attendance at a council meeting unless a Bylaw provides that another councillor or other person is to preside, and
  - (b) perform any other duty imposed on a chief elected official by this or any other enactment or Bylaw.
- (2)** Repealed 2022 c16 s9(40).
- (2)** Despite subsection (2), the chief elected official may be a member of a board, commission, subdivision authority or development authority established under Part 17 only if the chief elected official is appointed in the chief elected official's personal name.

1994 cM-26.1 s154;1995 c24 s21

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**Municipal Government Act RSA 2000 Chapter M-26  
Division 9 Council Proceedings**

SUMMER VILLAGE OF CASTLE ISLAND  
APPENDIX C

Public Hearing Procedure

Council may adopt a procedure for statutory public hearings.

Council shall abide by the underlying principles for statutory public hearings. The process will adhere as closely to the procedures outlined as possible although Council may adjust the process in order to accommodate a smooth flow of the proceedings provided that there is adherence to the underlying principles.

Council may follow this process for those non-statutory public hearings on issues that Council determines would benefit from public input.

Public Hearing Principles

These principles shall apply only to the process for Bylaws or resolutions that require a Public Hearing or that Council determines would benefit from a Public Hearing, and not to other Bylaws or resolutions.

1. Council shall hear any person, group of persons, or persons representing them, who claims to be affected by a proposed Bylaw or resolution and who has complied with the procedures outlined by Council.
2. Council, by majority vote, may decide to hear from any person other than those outlined in principle number 1.
3. The Public Hearing shall be held at a regular or special meeting of Council.
4. The Public Hearing shall be held before second reading of a Bylaw or before Council votes on a resolution.
5. After the Public Hearing, Council may pass the Bylaw or resolution, or make any amendments that it considers necessary.
6. If Council determines that the amendments to a Bylaw or resolution that requires a statutory Public Hearing have changed the intent of the Bylaw, Council shall re-advertise the Public Hearing, and commence with first reading of the Bylaw again.

Municipal Government Act RSA 2000 Chapter M-26  
Division 9 Council Proceedings

**PUBLIC HEARING PROCEDURES**

Definitions

1. "Chair" refers to the Presiding Officer officiating the Public Hearing
2. "Secretary" refers to the CAO or his/her designate Introduction & Procedures

SUMMER VILLAGE OF CASTLE ISLAND PUBLIC HEARING

Date Time

Bylaw #\*\*

INTRODUCTION & PROCEDURES

- 1 (Chair) "The following Public Hearing is held pursuant to the Municipal Government Act"
- 2 (Chair) "The following rules of conduct will be followed during the Public Hearing:"

Presentation should be brief and to the point  
The order of presentation shall be:

- a. Entry of written submission(s)
- b. Comments from ~~the \*\*\*~~ those physically in attendance in support of the Bylaw
- c. Comments from those attending virtually in support of the Bylaw
- d. Comments from those physically in attendance opposing the Bylaw,
- e. Comments for those attending virtually opposing the Bylaw

The Public Hearing purpose is "to receive comments from any interested parties on the proposed Bylaws"

"I hereby declare the Public Hearing relating to Bylaw \*\*\*\* open"

(Secretary) "The purpose of Bylaw \*\*\*\* is to amend \*\*\*.

First Reading was given to Bylaw \*\*\*\* on (insert date)

Notice of this Public Hearing was advertised on the website, on the (insert various method of advertising) in the week of (insert date)

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Municipal Government Act RSA 2000 Chapter M-26  
Division 9 Council Proceedings

The following written comments have been received to (insert date)

(Chair) "Are there any late written submissions relating to the Bylaw?"

(Note: If there are any, the secretary to read letter into record)  
"Comments from the \*\*\*\* Department"

"Is there anyone who supports the Bylaw and wishes to speak?" "Is there anyone who opposes the Bylaw and wishes to speak?"

"Is there anyone deemed to be affected by the Bylaw and wishes to speak?"

(Chair) "Are there any further comments from the \*\*\*\* Dept."

(Chair) "Do the Councilors have any further questions"

(Chair) "If not, I hereby declare this Public Hearing relating to Bylaw \*\*\*\* be closed and will accept a motion to adjourn this Public Hearing."

**SUMMER VILLAGE OF CASTLE ISLAND**

P.O. Box 8 Alberta Beach, AB

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**Summer Village of Castle Island - Information  
and Request For Decision**

<b>Meeting:</b>	<b>Castle Island Council</b>
<b>Meeting Date:</b>	<b>June 15<sup>th</sup>, 2026</b>
<b>Originated By:</b>	<b>Administration</b>
<b>Title:</b>	<b>New Privacy Management Framework</b>
<b>Agenda Item #:</b>	<b>7(b) – Bylaws and Policies</b>

**BACKGROUND/PROPOSAL:**

As we are all well aware, the passing of new privacy legislation (the Protection of Privacy Act and the Access to Information Act) in 2025 set a one-year timeline for local authorities to adopt the new frameworks/requirements established within. This deadline for adoption was June 10, 2026.

Our Administrative team has been working with legal counsel to meet the challenge of this new privacy framework in a way that is both compliant and also practical for adoption within a multi-client organizational framework. The Privacy Management Plan is the comprehensive technical manual we are looking to adopt as the procedural basis for this new system. We have now also completed the Bylaws to formalize the adoption of the new framework. Administration has workshopped the manual inhouse and are ready to implement the framework as drafted, pending Council approval.

As we are slightly behind on the implementation date, we are asking for your consideration to adopt this framework, including the two Bylaws and the Plan. For ease of presentation, we will address the Bylaws under the Business section, **however we ask that the PMP be kept as privileged information until further notice (this will be discussed in Closed Session).**

**DISCUSSION/OPTIONS/BENEFITS/DISADVANTAGES:**

The Privacy Management Framework consists of four major elements, which the Board should consider concurrently and address as a collective exercise in this originating adoption:

- a) The Protection of Privacy Bylaw (Bylaw 2026-06, attached)
- b) The Access to Information Bylaw (Bylaw 2026-05, attached)
- c) The Privacy Management Program (which includes a 'Plan,' and is a policy manual)
- d) The Designation of Any Privacy Authorities (like a mini organizational meeting)

The two Bylaws are requirements resulting from the new legislation. These Bylaws establish the legislative framework resulting from each respective Act, and are designed to transfer certain authorities and obligations through the Council to Administration to implement and maintain the new framework. The Bylaws are simple, but important. The Bylaws create the skeleton that is fleshed out by the details in the PMP, and establish the process for passing and revising the PMP.

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## **SUMMER VILLAGE OF CASTLE ISLAND**

P.O. Box 8 Alberta Beach, AB  
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The Privacy Management Program has been the principal undertaking in meeting the compliance requirements of the framework. Patriot Law provided – and continues to provide – excellent support in developing this program. The program contains the required Privacy Management Plan, but also gives best practices, practical processes to follow, template language and forms, and response protocols, easy to follow and consistent classification and implementation strategies and general guidance to all levels of staff in knowing their roles, responsibilities, and authorities in the process.

The designation of authorities is a formal assignment of roles within the new framework, as the PMP promotes. Some of these roles can technically be filled by Administration following the flow of authority in the Bylaws, but, much like the regular organizational meeting, we do like to get the Council's endorsement of these designations to keep everyone on the same page.

### **STAKEHOLDER ENGAGEMENT/COMMUNICATION:**

Not necessarily "active engagement," but we will take steps to add a privacy tab to the website and start adding material there as the program develops. We will also begin adopting the recommended verbiage on correspondence, forms, and documents for privacy disclaimers and classification protocols – so expect to see those references going forward.

Wildwillow Enterprises Inc. hosted an elected officials POPA/AITA PMP overview for their partner municipalities on May 5, 2026 (10am and 6:30pm) for a more in-depth working assessment of the PMP, so the concept may be generally familiar to some Council members by virtue of this presentation.

### **FUNDING AND COST CONSIDERATIONS:**

The cost to complete the PMP, not including administrative time to-date, has been ~\$17,000. The majority of the cost has been covered, however some costs will be recovered through partnership with various partnering municipalities and the balance was covered by the WILD Water Commission by reserves.

### **RECOMMENDED ACTION:**

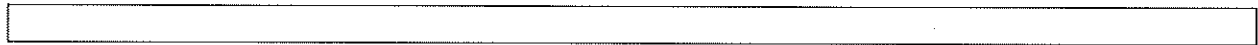
- a) That Council discuss the Privacy Management Program in Closed Session to review the final version of the Privacy Management Program, as drafted, for final review before adoption.
- b) That Council give all required readings to Bylaw 2026-06, the Protection of Privacy Bylaw, and authorize Administration to execute same effective this date, June 15<sup>th</sup>, 2026.
- c) That Council give all required readings to Bylaw 2026-05, the Access to Information Bylaw, and authorize Administration to execute same effective this date, June 15<sup>th</sup>, 2026.

**SUMMER VILLAGE OF CASTLE ISLAND**

P.O. Box 8 Alberta Beach, AB

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- d) That Council adopts the Privacy Management Program, including the prescribed Privacy Management Plan, 2026 edition as presented this day, June 15<sup>th</sup> 2026, and authorizes Administration to begin the implementation of the same as a course of regular business, as discussed.
  
- e) That Council appoint Chief Administrative Officer, Wendy Wildman as Head of the Public Body under the provisions of the Privacy Management Act, the appointment of Wendy Wildman as the designated Privacy Officer and Access to Information Officer for the Summer Village of Birch Cove, effective this 15<sup>th</sup> day of June, 2026.



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**A BYLAW OF THE SUMMER VILLAGE OF CASTLE ISLAND IN THE PROVINCE OF  
ALBERTA FOR THE PURPOSES OF  
THE ACCESS TO INFORMATION ACT AND TO SET FEES THEREUNDER**

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**WHEREAS** pursuant to Section 98(a) of the *Access to Information Act, SA 2024, c A-1.4*, the Summer Village of Castle Island (hereinafter called the "Municipality" must designate a person or group of persons as the head of the Municipality for the purpose of the Act;

**AND WHEREAS** pursuant to Section 98(b) of the *Access to Information Act, SA 2024, c A-1.4*, the Municipality may set any fees the Municipality requires to be paid under section 96, which must not exceed the fees provided for in the Regulations;

**NOW THEREFORE** under the authority of the *Municipal Government Act, RSA 2000, c M-26*, the Council of the Summer Village of Castle Island enacts as a Bylaw as follows:

**PART 1 TITLE**

1.1 This Bylaw shall be known as the "Access to Information Bylaw."

**PART 2 DEFINITIONS**

1.2 "Act" means the *Access to Information Act SA 2024, c A-1.4*, as amended;

1.3 "Applicant" means a person who makes a request for access to information under the Act;

1.4 "Chief Administrative Officer" means the Chief Administrative Officer of the Summer Village of Castle Island

1.5 "Municipality" means the Summer Village of Castle Island;

1.6 "Regulations" means the Access to Information Act Regulation, Alta Reg 133/2025.

**PART 3 INTERPRETATION**

1.1 The headings in this Bylaw are for reference purposes only.



**PART 4 DESIGNATED HEAD**

- 4.1 For the purposes of the Act, the Chief Administrative Officer is designated as the head of the Municipality.
- 4.2 The head of the Municipality, or designate, will recommend policy guidelines in accordance with the Act and they may be implemented or amended from time to time by Council resolution.

**PART 5 FEES**

- 5.1 Where an Applicant is required to pay a fee for services, the fee payable shall be in accordance with the Act and the regulations, as amended from time to time, or any successor regulation that sets fees for requests to access information.

**PART 6 SEVERABILITY**

- 6.1 Should any provision of this Bylaw be invalid, then such provision shall be severed, and the remainder of the Bylaw shall remain in force.

**PART 7 TRANSITION AND COMING INTO FORCE**

- 7.1 This Bylaw takes effect on the final passing and signing thereof.

READ A FIRST TIME THIS 15<sup>th</sup> DAY OF JUNE, 2026

READ A SECOND TIME THIS 15<sup>th</sup> DAY OF JUNE, 2026

UNANIMOUS CONSENT to proceeding to third reading this 15<sup>th</sup> DAY OF JUNE, 2026

READ A THIRD TIME THIS 15<sup>TH</sup> DAY OF JUNE, 2026



**SUMMER VILLAGE OF CASTLE ISLAND**

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Mayor, Calvin Smith

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Chief Administrative Officer, Wendy Wildman



**PROTECTION OF PRIVACY BYLAW**

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**BEING A BYLAW OF THE SUMMER VILLAGE OF CASTLE ISLAND , IN THE PROVINCE OF ALBERTA, FOR THE PURPOSES OF THE PROTECTION OF PRIVACY ACT, TO ESTABLISH A DIRECTORY OF PERSONAL INFORMATION BANKS, AND TO ESTABLISH A PRIVACY MANAGEMENT PROGRAM**

**BYLAW NO. 2026-06**

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**WHEREAS** pursuant to Section 55(1) of the *Protection of Privacy Act, SA 2024, c P-28.5*, the Summer Village of Castle Island (hereinafter called the "Municipality" may delegate to any person any power, duty, or function of the head under the Act, except the power to delegate;

**AND WHEREAS** pursuant to Section 55(2) of the *Protection of Privacy Act, SA 2024, c P-28.5*, a delegation must be in writing and may contain any conditions or restrictions the head of the public body considers appropriate;

**AND WHEREAS** pursuant to Section 57(2) of the *Protection of Privacy Act, SA 2024, c P-28.5* the head of the Municipality must publish a directory, in printed or electronic form, that lists the Municipality's Personal Information Banks;

**AND WHEREAS** pursuant to section 6(1) of the *Protection of Privacy Act (Ministerial) Regulation, Alta Reg 143/2025*, the Municipality must establish a Privacy Management Plan;

**NOW THEREFORE** under the authority of the *Municipal Government Act, RSA 2000, c M-26*, the Board of the Council of the Summer Village of Castle Island enacts as a Bylaw as follows:

**PART 1 TITLE**

1.1 This Bylaw shall be known as the "Protection of Privacy Bylaw."

**PART 2 DEFINITIONS**

1.2 "Act" means the *Protection of Privacy Act, SA 2024, c P-28.5*, as amended;

1.3 "Chief Administrative Officer" means the Chief Administrative Officer of the Summer Village of Castle Island;

1.4 "Municipality" means the Summer Village of Castle Island

1.5 "Regulations" means the *Protection of Privacy Act (Ministerial) Regulation, Alta Reg 143/2025*.

**PART 3 INTERPRETATION**

3.1 The headings in this Bylaw are for reference purposes only.

**PART 4 DESIGNATED HEAD**

4.1 For the purposes of the Act, the Chief Administrative Officer is designated as the head of the Municipality.

**PART 5 PRIVACY OFFICER**

5.1 For the purposes of the Act, the Chief Administrative Officer shall designate a member of the Municipal staff as the Privacy Officer.

**PART 6 PERSONAL INFORMATION BANKS DIRECTORY**

6.1 For the purposes of the Act, the head of the Municipality is empowered to publish a directory, in printed or electronic form, that lists the Municipality's personal information banks.

**PART 7 PRIVACY MANAGEMENT PROGRAM**

7.1 The Municipality's privacy management program may be approved by the Council by resolution.

**PART 8 SEVERABILITY**

8.1 Should any provision of this Bylaw be invalid, then such provision shall be severed, and the remainder of the Bylaw shall remain in force.

**PART 9 TRANSITION AND COMING INTO FORCE**

9.1 This Bylaw takes effect on the final passing and signing thereof.

READ A FIRST TIME THIS 15TH DAY OF JUNE, 2026

READ A SECOND TIME THIS 15TH DAY OF JUNE, 2026

UNANIMOUS CONSENT to proceeding to third reading this 15<sup>TH</sup> DAY OF JUNE, 2026

READ A THIRD TIME THIS 15<sup>TH</sup> DAY OF JUNE, 2026

**SUMMER VILLAGE OF CASTLE ISLAND**

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Mayor, Calvin Smith

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Chief Administrative Officer, Wendy Wildman

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**Additional ARB Member - RE: Appointment of ARB Officials 2026 & Parcel Count as at Jan 1/2026 - response required**

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From Geryl Amarin <geryl@amorinaccounting.com>

Date Tue 2026-05-19 11:15 AM

Good morning All:

Please note we have an additional Member that was recently certified as an ARB Member eligible to adjudicate on LARB and CARB panels:

**Please have your councils appoint:**

**Braden Lanctot as an additional ARB Official: Certified Panelist**

For clarity this is in addition to the 7 Members below, and there are no other changes.

Thank-you

**Geryl Amarin, CPA | ARB Clerk**

Capital Region Assessment Services Commission (CRASC)  
11810 Kingsway Avenue  
Edm AB T5G 0X5  
Direct: 780 297 8185



**Confidentiality Warning:** This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

**From:** Geryl Amarin

**Sent:** February 2, 2026 3:05 PM

**Subject:** Appointment of ARB Officials 2026 & Parcel Count as at Jan 1/2026 - response required

**Importance:** High

Hello All,

As per 4. a. of the CRASC Participant Agreement – please provide your municipality's total parcel count as of Jan. 1, 2026 – no later than Feb. 15, 2026. (Do not include DIP, Linear, Exempt, Municipal Owned and similar parcels)  
*This will be used to calculate the total parcel fees due in accordance with Schedule "A" of the Agreement*

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# Summer Village of Castle Island

## Administration Policy

**PURPOSE:**

Number	Title		
A-ADM-ASSETMGMT	Asset Management Policy		
Approval	Approved		Last Revised
(CAO Initials)	Resolution No:		Resolution No:
	Date:	June 15 <sup>th</sup> , 2026	Date:

The purpose of this Policy is to establish a consistent and transparent framework for managing municipal assets in accordance with the *Municipal Government Act* and other applicable Provincial legislation. The Policy makes sure that the Summer Village’s assets are managed responsibly to provide safe, reliable and affordable services to both permanent residents and the significant seasonal population that visits the Summer Village of Castle Island.

**SCOPE:**

This Policy applies to all municipal assets owned, operated or managed by the Summer Village of Castle Island including but not limited to:

- Land
- Land Improvements
- Buildings
- Machinery & Equipment
- Vehicles
- Engineered Structures

Given the Summer Village’s limited staffing and financial capacity, Asset Management activities will be scaled appropriately to available resources.

**GUIDING PRINCIPLES:**

- **Service Delivery:** Assets exist to support essential municipal services. Decisions will focus on maintaining realistic, affordable service levels aligned with community needs.
- **Lifecycle Approach:** Assets are managed from acquisition through operation, maintenance, renewal and eventual disposal, to maximize useful life and minimize unexpected failures.
- **Financial Stability:** Asset decisions will balance affordability with risk and performance. Long-term planning will consider the Summer Village’s limited tax base, seasonal population fluctuations and constrained operating budget.

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# Summer Village of Castle Island

## Administration Policy

- **Risk Management:** The Summer Village prioritizes critical assets – such as wastewater infrastructure, roads and drainage systems – to reduce risks to public safety, environmental protection and service continuity.
- **Transparency & Accountability:** Council and Administration make asset decisions openly, supported by clear documentation, reporting and communication with residents.
- **Integration:** Asset management will be integrated with the Summer Village's strategic planning, budgeting, emergency planning and regulatory obligations.

### **ROLES AND RESPONSIBILITIES:**

#### **Council:**

- Approves the Policy and sets strategic direction.
- Defines acceptable service levels in consultation with administration.
- Approves budgets, capital plans and long-term financial strategies.

#### **Administration:**

- Implements this Policy and maintains the asset registry.
- Provides annual reporting on asset conditions, replacement values, risks and service levels.
- Advises Council on priorities, funding needs and regulatory requirements.
- Ensures asset management practices are scaled to the Summer Village's staffing and financial capacity.

#### **Staff:**

- Operate and maintain assets in accordance with defined service levels.
- Report on asset condition, failures and operational issues.
- Support data collection for the asset registry.

#### **Service Levels:**

- Service levels are defined by Council, based on community expectations, affordability and regulatory requirement.
- Service levels reflect the Summer Village's small size, limited staffing and seasonal fluctuations in demand.
- Service levels are reviewed regularly and adjusted as needed.

#### **Lifecycle & Financial Management:**

- Asset decisions consider total lifecycle costs, not just initial purchase price.
- Renewal and replacement planning are proactive to reduce service disruptions and emergency repairs.



# Summer Village of Castle Island

## Administration Policy

- Financial planning includes reserves, grant opportunities and long-term strategies to support asset renewal within the Summer Village's limited fiscal capacity.
- The Summer Village will pursue partnerships and regional collaboration where beneficial and necessary.

### Risk Management:

- Risks to service delivery are identified, assessed and managed.
- Critical assets – such as wastewater systems, drainage infrastructure and key transportation routes – receive priority in renewal planning.
- The Summer Village maintains compliance with all applicable provincial and federal regulations.
- Limited staff capacity is considered when assessing operational risks.

### Monitoring & Reporting:

Administration provides annual reports to Council on:

- Asset condition and performance
- Replacement values and funding needs
- Progress on asset management implementation
- Reports are used to inform budget and capital planning decisions

### Review Cycle

This Policy will be reviewed every four years, or sooner if required by legislative changes or significant shifts in municipal Council and/or priorities.

### Legal References:

### Revisions:

Resolution Number	MM/DD/YY



LAC STE. ANNE COUNTY

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May 15, 2026

Village of Alberta Beach  
P.O. Box 278  
Alberta Beach, Alberta  
T0E 0A0

[aboffice@albertabeach.com](mailto:aboffice@albertabeach.com)

Dear Ste. Anne Regional Lake Use Committee (SARLUC) Members,

**Re: Overall Council Committee Review**

Good afternoon, as new members of County Council we have undertaken a review of all committees of council. This was presented at the May 14, regular County Council meeting. Council is removing their representation from the Ste. Anne Regional Lake Use Committee. Any future lake or water development can be addressed through the Intermunicipal Collaboration Framework (ICF).

If you have any questions, please reach out to me at [jpreugschas@lsac.ca](mailto:jpreugschas@lsac.ca).

Thank you.

A handwritten signature in black ink, appearing to be 'J. Preugschas', written in a cursive style.

Jurgen Preugschas  
Reeve, Lac Ste. Anne County

Cc: Summer Villages of Lac Ste. Anne County East (SVLSACE)  
County Council  
Ann Mitchell, CAO

# SUMMER VILLAGE OF CASTLE ISLAND

## POLICY AND PROCEDURE MANUAL FOR COMPLIANCE WITH THE ACCESS TO INFORMATION ACT AND PROTECTION OF PRIVACY ACT



Effective Date: June 15<sup>th</sup>, 2026

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## INTRODUCTION

### DEFINITIONS

**1. In this Policy Manual, including its appendices, the following words or phrases have the following meanings:**

- (1) "Access Request" means a formal request for access to records under the Access to Information Act;
- (2) "Access to Information Coordinator" or "ATIC" means the person within the Municipality who is responsible to manage requests for information under the ATIA, and who may be the same person as the Privacy Officer;
- (3) "Artificial Intelligence System" means a machine-based system that, for explicit or implicit objectives, infers from the input that it receives how to generate output such as content, predictions, recommendations or decisions, that can influence physical or virtual environments;
- (4) "ATIA" means the *Access to Information Act, SA 2024, c A-1.4*, as amended;
- (5) "Automated System" means any system, software, or process that uses computation as the whole or part of a system to determine outcomes, make or assist decisions, inform policy implementation, collect data or observations, or otherwise interact with individuals or other stakeholders, and may include, but are not limited to, systems derived from machine learning, statistics, other data processing, or artificial intelligence, but does not include passive computing infrastructure;
- (6) "CAO" means the Chief Administrative Officer of the Municipality;
- (7) "Commissioner" has the meaning given to it in POPA;
- (8) "Data Matching" has the meaning given to it in POPA;
- (9) "Head of the Public Body" has the meaning given to it in ATIA;
- (10) "High Sensitivity Information" has the meaning given to it in the Protection of Privacy (Ministerial) Regulation (Alta Reg 143/2025);
- (11) "IT" means Information Technology;
- (12) "Municipality" means the Summer Village of Birch Cove;
- (13) "Non-Personal Data" has the meaning given to it in POPA;
- (14) "Personal Information" has the meaning given to it in POPA;
- (15) "Personal Information Bank" means a collection of Personal Information that is organized or retrievable by the name of an individual or by an

identifying number, symbol, or other particular that is assigned to an individual;

- (16) "POPA" means the *Protection of Privacy Act, SA 2024, c P-28.5*, as amended;
- (17) "Privacy Breach" means an incident involving the loss of, unauthorized access to, or unauthorized disclosure of Personal Information in the custody or control of the Municipality where a reasonable person would consider that there exists a real risk of significant harm to an individual;
- (18) "Privacy Impact Assessment" has the meaning given to it in POPA;
- (19) "Privacy Management Plan" has the meaning given to it in POPA;
- (20) "Privacy Officer" means the person within the Municipality who is responsible for ensuring the Municipality's compliance with POPA; and
- (21) "Security Classification Levels" means the levels of security classification that the Municipality applies to data and information as outlined in this Policy and Procedure Manual.

## **PART I - ACCESS TO INFORMATION ACT**

### **2. Access to Information Statement – General**

- (22) ATIA allows individuals to request records or personal information that are held by municipalities or other public bodies. Any record that is in the possession of a public body may be subject to an access to information request.
- (23) The Municipality aims to be as transparent as possible regarding the information it holds and, as such, routinely discloses information deemed to be of public interest through various means, including:
  - (a) Publishing information on the Municipality's website;
  - (b) Publishing information in local newspapers;
  - (c) Publishing information through the Municipality's social media accounts; and
  - (d) Processing informal information requests received in-person, by telephone, through mail, or by email.
- (24) The Municipality encourages information access requests to be processed as outlined above when possible and will make every effort to ensure pro-active release and dissemination of information, minimizing the need to request information through the formal ATIA request process.



(25) Municipal administration is responsible for managing access requests made under ATIA.

(26) Every reasonable effort shall be made to assist applicants. This means responding openly, accurately, and completely to requests for access to information.

### **3. Access to Information Statement – Website**

(27) A statement respecting the Municipality's Access to Information Policy shall be included on the Municipality's website. The current text for such statement is outlined at **Appendix 1.1**.

### **4. Head of the Municipality**

(28) The Head of the Municipality will be designated by Council by Bylaw or resolution and will ordinarily be the CAO.

(29) The CAO shall designate the ATIC.

### **5. Delegation of Authority**

(30) Delegation of specific authorities under ATIA is outlined in the Delegation Table at **Appendix 1.2**.

(31) Notwithstanding the delegation of authorities at **Appendix 1.2**, the Head of the Municipality retains full authority to exercise any duty, power, or function, under ATIA at any time.

### **6. Access to Records Available without an Access Request**

(32) The following documents shall be available to the public without an Access Request:

(a) Any manual, handbook, guideline, or policy used by employees of the Commission in decision making processes that affect the public under ATIA;

(b) Bylaws;

(c) Assessment Roll;

(d) Personal Information Bank Directory;

(e) Statutory plans

(f) Redacted development permits;

(g) Board / Council Meeting Minutes;

(h) Meeting Agendas;

(i) Approved budgets, financial plans, and audited financial statements;

- (j) Anything designated as Public;
- (k) Other (other items that may be applicable)

## 7. How to Make an Access Request

### (33) Personal Information Access Requests

- (a) Personal access requests are requests for access to records that contain Personal Information about the applicant, or about an individual that the applicant is authorized to represent (such as their lawyer, their Trustee, or an attorney under a power of attorney).
- (b) The Municipality employs a formal and documented process to authenticate the identity of individuals for the release of information. Specifically, this authentication process requires the Municipality to collect identifying information about the applicant to match with the information the Municipality holds on file. This will enable the Municipal staff to confirm that the applicant is who they say they are, and that they have the right to access the Personal Information requested.
- (c) There is some discretion in determining what identifying information is required to authenticate identity. The preferred method is with government issued photo identification being provided. However, where that is not possible other methods may be used including, without limitation, government issued documents that do not contain a photo, other personal records or documents, or the provision of a statutory declaration.

### (34) General Access Requests.

- (a) A general access request is a request for access to records that are not the Personal Information of the applicant.

### (35) Forms for Access Requests

- (a) Requests for access are to be submitted on the standard request form.

### (36) Fees for Access Requests

- (a) There is no fee for making a personal access request unless the cost of producing copies exceeds \$10.00.
- (b) For general access requests:
  - (i) The request requires a \$25.00 applicant fee, and the processing of the request will not begin until that fee has been received.

- (ii) Additional fees may also be required if the total fee for completing the request is estimated to be greater than \$150.00, in which case the applicant shall be notified and will be asked to pay a 50% deposit prior to processing.
- (iii) When the request is completed, the applicant shall be notified of the total costs for processing and will be required to pay any balance due before the requested records are disclosed.

(37) Requests for Fee Waivers:

- (a) Requests for fee waivers must be made in writing with substantiation for the based waiver being provided by the applicant. The request will be reviewed and considered based on whether/if<sup>1</sup>:
  - (i) The applicant cannot afford the payment or for any other reason it is fair to excuse payment; or
  - (ii) The record relates to a matter of public interest, including the environment, or public health or safety.
- (b) A written response will be provided to the applicant for a fee waiver within 30 business days after the receipt of the request for a fee waiver. That response will confirm the decision to grant or deny the request, the reasons for the decision, and that the applicant may request a review.

**8. Access Request Processing Procedures**

(38) The procedure for processing access requests is as follows:

- (a) Generally, the Municipality is required to respond within 30 business days of receiving the request. However, the Municipality will endeavor to respond to the request as soon as possible.
- (b) The 30-day deadline may be approved for extension if, for example, a large volume of information is required, or if third party consultation is required prior to processing the request.
- (c) The Municipality will ensure that the requested application is complete and the initial application fee has been provided, if required.
- (d) The Municipality will assess the request to determine the following:
  - (i) Whether the request is a personal access request or a general access request;
  - (ii) Whether the request is a continuing request;

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<sup>1</sup> See section 96 of ATIA.

- (iii) Whether the required fee (if applicable) has been received from the applicant (further processing is not completed until the required fee is received);
  - (iv) Whether the requested information is in the custody or control of the Municipality (or whether the request needs to be transferred to another public body);
  - (v) Whether the request will result in total fees estimated to be greater than \$150.00, in which case a fee estimate will be completed, and the applicant will be asked to pay the 50% deposit;
  - (vi) Whether the request will require third party consultation (in which case the deadline for a response may be extended) (this step will be evaluated again once the applicable records have been located);
  - (vii) Whether the requested information is sufficiently clearly described by the applicant to determine the scope of the request (and if it is not sufficiently clearly described, clarification will be sought from the applicant);
  - (viii) Whether the request may be disregarded for any of the specified reasons in ATIA (such as unreasonable interference with operations, abuse of process, threatening, abusive or vexatious, lack of clarity despite efforts, overly broad or incomprehensible)<sup>2</sup>; and/or
  - (ix) Whether the request is for Data Derived from Personal Information or Non-Personal Data (which are **not** accessible through an access request).<sup>3</sup>
- (e) Once the application is complete, the necessary fee has been received, the Municipality will locate the documents or other records that are responsive to the request;
- (f) Once all the responsive documents or records have been located, the documents/records will be evaluated for the following:
- (i) Whether any mandatory or discretionary exemptions apply to any of the information contained in the records;
  - (ii) Whether the request will require third party consultation (in which case the deadline for a response may be extended); and/or
  - (iii) Any other considerations applicable under ATIA or POPA.

<sup>2</sup> See section (9) (a) – (e) of ATIA.

<sup>3</sup> See paramountcy provisions in section 19(4) and 23(4) of POPA.



- (g) Any questions arising from the evaluation of the records for exemptions should be directed to the Privacy Officer who may, if required, seek legal advice.
- (h) Once all documents /records have been evaluated for exemptions, and any third-party consultation has been completed, the documents will be prepared for release to the applicant. This means identifying any necessary redactions, and applying the necessary redactions.
- (i) Documents / records will be released to the applicant with a cover letter that includes a notice that if the applicant disagrees with a response received from the Municipality, or if they have a complaint about the Municipality's information management practices, they can request a review or file a complaint with the Office of the Information and Privacy Commissioner of Alberta (OIPC). It will also note that if the applicant is requesting a review, the request must be submitted to the OIPC within 60 days of a decision being made by the Municipality.

## 9. Document Management Procedures for Access Requests

- (39) The Municipality will maintain a separate file management system for requests under ATIA. This will include the following:
  - (a) Distinct physical and/or electronic records files for all requests, organized by ATIA request file number. These records will contain copies of all documents relating to the requests including all correspondence, a request process tracking sheet, and copies of all documents released to the applicant; and
  - (b) A master ledger confirming the status of all ATIA requests, by file number.
- (40) The request tracking sheet template for each ATIA access request is attached at **Appendix 1.3**.

## APPENDIX 1.1 – ATIA WEBSITE NOTICE

### Access to Information Policy

#### General

The *Access to Information Act (ATIA)* allows applicants the right to access non-personal records held by the Municipality and personal records about an applicant, subject to certain exceptions.

Disclosure of all information in the Municipality's possession is subject to the *Access to Information Act (ATIA)* and the *Protection of Privacy Act (POPA)*.

The Municipality is committed to responding to access for information requests in an open, accurate, and complete fashion. The Municipality is also committed to providing every reasonable effort to assist applicants.

#### Making Requests for Information

To request information, applicants must submit requests in writing using the access to information request form.

The Municipality has 30 business days to respond to initial ATIA requests. ATIA and/or the Office of the Information and Privacy Commissioner (OIPC) may permit additional time in some circumstances (for example, where third parties must be contacted or where a large volume of records have been requested).

All fees and response times follow the ATIA and its regulations.

#### Requesting General Information

If your request is for general information (i.e. not personal information about yourself):

- Ensure that you describe the information you are requesting in sufficient detail;
- Include file numbers and dates wherever possible;
- Sign the form;
- Provide the required \$25.00 application fee;
- Mail, email, or deliver in person to the Municipality's Access to Information Coordinator (ATIC); and
- Contact the Municipal office for payment options if you plan to email your request.

Processing of your request will begin when the application fee is received. If the total fee for completing your request is estimated to be greater than \$150.00, the

Municipality will contact you and you will be asked to pay a 50% deposit. If a deposit is required in these circumstances, the processing of your request will be suspended until the deposit is received.

### **Requesting Personal Information**

If your request is for personal information about you:

- Ensure that you describe the information about yourself that you wish disclosed in sufficient detail;
- Includes any relevant dates, names, file number or other relevant information that will assist with your request;
- Sign the form;
- Mail, email, or deliver in person to the Municipality's Access to Information Coordinator (ATIC); and
- There is no fee for personal information unless the photocopying charges exceed \$10.00.

Note that you will be required to provide proof of your identity to the Municipality before records containing your personal information are provided to you.

### **Contacting the Office of the Information and Privacy Commissioner (OIPC)**

If you are not satisfied with the Municipality's response to your request for information, you may contact the OIPC. Their website is: <https://oipc.ab.ca/information-access-review/>

### **Contacting Us**

If you have any questions or comments about the administration of the *Access to Information Act* or *Protection of Privacy Act*, please contact the Municipality's Access to Information Coordinator whose contact details are:

Name: Wendy Wildman, Chief Administrative Officer

Phone: (780)967-0271

Email: [wendy@wildwillowenterprises.com](mailto:wendy@wildwillowenterprises.com)

**APPENDIX 1.2 – ATIA DELEGATION OF AUTHORITY TABLE**

Duty, power or function of Head	Section reference	Retained by Head of Public Body	Delegated to ATI Coordinator	Delegated to other person(s) (provide title(s) – specific or generic)
<b>Right of Access</b>				
Authority to declare request abandoned	10(1)		X	
Authority to grant continuing request	11(2)		X	
Duty to assist applicants	12(1)		X	
Duty to document decisions and actions respecting an access request	Regulation 5(4)		X	
Duty to provide access to a record	12(2)		X	
Authority to decide on content of response/ grant or refuse access	13, 14(1)	X		
Authority to refuse to confirm or deny the existence of a record	14(2)	X		
Authority to decide how access will be given	15 Regulation 6		X	
Authority to extend time limit	16(1), (2), (3), (9)	X		
Authority to transfer a request for access	17		X	
Authority to disregard requests	9	X		

Duty, power or function of Head	Section reference	Retained by Head of Public Body	Delegated to ATI Coordinator	Delegated to other person(s) (provide title(s) - specific or generic)
<b>Exceptions</b>				
Authority to withhold information harmful to business interests of a third party	19	X		
Authority to withhold information harmful to personal privacy	20	X		
Authority to withhold information harmful to individual or public health or safety	21 Regulation 8(1), (3), (5)	X		
Authority to withhold confidential evaluations	22	X		
Authority to withhold information harmful to law enforcement	23	X		
Authority to withhold information harmful to a workplace investigation	24	X		
Authority to withhold information that reveals the identity of a person who has requested advice or made a disclosure/ complaint pursuant to the <i>Public Interest Disclosure Act</i>	25	X		

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<b>Duty, power or function of Head</b>	<b>Section reference</b>	<b>Retained by Head of Public Body</b>	<b>Delegated to ATI Coordinator</b>	<b>Delegated to other person(s) (provide title(s) - specific or generic)</b>
Authority to withhold information harmful to inter-governmental relations	26	X		
Authority to withhold Cabinet and Treasury Board confidences	27	X		
Authority to withhold local public body confidence	28	X		
Authority to withhold advice from officials	29	X		
Authority to withhold information/ records about audit by Chief Internal Auditor	29(3)	X		
Authority to withhold information harmful to economic interests of a public body	30	X		
Authority to withhold testing procedures, tests and audits	31	X		
Authority to withhold privileged information	32(1), (2)	X		



Duty, power or function of Head	Section reference	Retained by Head of Public Body	Delegated to ATI Coordinator	Delegated to other person(s) (provide title(s) - specific or generic)
Authority to withhold information harmful to conservation of heritage sites or endangered species	33	X		
Authority to withhold information that is or will be available to public	34		X	
<b>Third Party Intervention</b>				
Duty to give third party notice	35		X	
Authority to decide whether to give access to third party information	36(1)	X		
Duty to give notice of decision	36(4)-(6)		X	
<b>Public Interest</b>				
Authority to disclose information in the public interest	37(1)	X		
Duty to give notice to third party, Commissioner	37(3), (4)	X		
<b>Reviews and Complaints</b>				
Authority to ask the Commissioner for advice	49(1)	X		

Duty, power or function of Head	Section reference	Retained by Head of Public Body	Delegated to ATI Coordinator	Delegated to other person(s) (provide title(s) - specific or generic)
Authority to require Commissioner to examine original record on site	50(4)	X		
Authority to receive requests for review	59(1)		X	
Right to make representations to the Commissioner	71(3), (5)	X		
Duty to discharge burden of proof	63	X		
Duty to comply with Commissioner's Order	66	X		
<b>General Provisions</b>				
Allowing a guardian to exercise the rights or powers of a minor	86(1)(e)		X	
Authority to specify categories of records available without formal request and require a fee	90	X		
Duty to make manuals available	91		X	
<b>Fees</b>				
Authority to assess and collect fees	96		X	
Authority to waive fees	96(5)		X	

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Duty, power or function of Head	Section reference	Retained by Head of Public Body	Delegated to ATI Coordinator	Delegated to other person(s) (provide title(s) - specific or generic)
Duty to give notice of decision to grant or refuse waiver request	96(6)	X		
<b>Right of Access</b>				
Establishing process for receiving access requests	2(a), (b)	X		
Assuring process for access is made public	Regulation 3(1)		X	

UNAPPROVED

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**APPENDIX 1.3 – ACCESS TO INFORMATION ACT REQUEST TRACKING  
FORM**

**Access to Information Act  
Request Tracking Form**

[Municipality]

ATIA File No:	
Date Request Received:	
Date Application Fee Received (if general request):	

**PART 1 - TYPE OF APPLICATION (select applicable):**

Personal Access Request  General Access Request  Continuing Request (select if applicable)

**PART 2 – APPLICANT DETAILS**

Applicant Name:	
Complete address:	
Telephone Number:	
Email:	

**PART 3 – APPLICATION DETAILS**

Description of Request:	
Is the request sufficiently clear?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No: Details re: clarification requested from Applicant (applicant to respond within 30 business days):

Method requested for review of documents?	<input type="checkbox"/> View only <input type="checkbox"/> Electronic copies <input type="checkbox"/> Printed Copies
Continuing Request Timeline (for up to 2 years)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: Confirmation of end date:
Acknowledgment of receipt to applicant:	
Confirmation of Deadline to Provide Response (routine request – 30 business days)	

**PART 4 – INITIAL APPLICATION REVIEW**

Within custody or control of the Municipality?	<input type="checkbox"/> Yes <input type="checkbox"/> No If No: Details re: referral to other public body or correspondence to applicant (including dates) (note transfer request to be completed within 15 business days of receipt):
Cost to provide is estimated to be more than \$150.00?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: <input type="checkbox"/> Fees estimate sent to Applicant      Date: <input type="checkbox"/> 50% Deposit received from Applicant      Date:
Request for Fee Waiver? Fee may be waived, on request from applicant, if satisfied that: <ul style="list-style-type: none"> <li>• Applicant cannot afford the payment or for another reason it is fair to excuse payment; or</li> <li>• The record relates to a matter of public interest, including the environment, or public health or safety</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: <input type="checkbox"/> Assessment of Request      Date: Fee waiver granted: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Applicant advised of decision and reasons and that applicant may ask for review (required within 30 business days after receiving the request)      Date:



<p>Is the request of the type that may be disregarded for any of the following reasons:</p> <p>Unreasonable interference with operations, abuse of process, abusive, threatening, vexatious, already provided, lack of clarity despite efforts, overly broad or incomprehensible</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p><input type="checkbox"/> Applicant advised of decision with reasons and that may ask for review (within 30 business days after request received or within 30 days after receiving the applicant's response to a request for clarification)</p> <p>Date:</p>
<p>Is the request for data derived from personal information or non-personal data?</p> <ul style="list-style-type: none"> <li>• These are not accessible through an access request.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p><input type="checkbox"/> Applicant advised that information is not accessible through an access request applicant and that applicant may ask for review</p> <p>Date:</p>
<p>Abandoned Request for:</p> <ul style="list-style-type: none"> <li>• Response to request for clarification not received within 30 business days; or</li> <li>• Applicant fails to provide the fee.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p><input type="checkbox"/> Applicant advised request abandoned and that applicant may ask for review</p> <p>Date:</p>
<p>Time Limit for Response Extended for up to 30 additional business days because of:</p> <ul style="list-style-type: none"> <li>• Agreement of applicant;</li> <li>• Large number of records;</li> <li>• Time required to consult with a third party, another public body, or other entity; or</li> <li>• Multiple concurrent requests by same or related applicants.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p><input type="checkbox"/> Applicant advised of time extension, the reasons, when a request can be expected, and that applicant may ask for review</p> <p>Date:</p>
<p>Time Limit for Response Extended for the necessary time because of:</p> <ul style="list-style-type: none"> <li>• Considering giving access to specified records (s 19(1) or (2), or s. 20).</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes:</p> <p><input type="checkbox"/> Applicant advised of time extension and reasons and that applicant may ask for review</p>

	Date:
Time Limit for Response Extended for Emergency, Disaster or Unforeseen event that impacts operations?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: <input type="checkbox"/> Commissioner advised of the emergency, disaster, or unforeseen event Date: <input type="checkbox"/> Commissioner advised when emergency, disaster, or unforeseen event has ended and normal operations have returned Date: <input type="checkbox"/> Applicant advised when normal operations have resumed, when a response may be expected, and that applicant may request a review Date:

**PART 5 – RECORDS SEARCH**

Search for Records Complete:	Date:	Time Required to Locate Records
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**PART 6 – REVIEW OF RECORDS / ANALYSIS**

Third Party Consultation Required?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: Details re: referral to third party or correspondence to applicant (including dates) and response(s) received:
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Assessment for Mandatory Exemptions to Disclosure (select all applicable)	<input type="checkbox"/> Third Party Business Interests <input type="checkbox"/> Harmful to Personal Privacy <input type="checkbox"/> Cabinet / Treasury Board Confidences <input type="checkbox"/> Data Derived from Personal Information
Assessment for Discretionary Exemptions to Disclosure (select all applicable)	<input type="checkbox"/> Individual or Public Safety <input type="checkbox"/> Confidential Evaluations <input type="checkbox"/> Law Enforcement <input type="checkbox"/> Workplace Investigations <input type="checkbox"/> Disclosure /Complaints <input type="checkbox"/> Inter-Governmental Relations <input type="checkbox"/> Local public body confidences <input type="checkbox"/> Advice from Officials <input type="checkbox"/> Economic or other interests <input type="checkbox"/> Testing procedures, tests and audits <input type="checkbox"/> Legal Privilege <input type="checkbox"/> Heritage Sites <input type="checkbox"/> Is or Will be available to Public

**PART 7 – PREPARATION OF RECORDS FOR DISCLOSURE**

<b>IDENTIFICATION OF REDACTIONS:</b>		
Preparation of records for redaction completed:	Date:	Time Required:
Creation of Table outlining planned redactions and authorities completed (Index of Records):	Date:	Time Required:
<b>REVIEW OF DOCUMENTS BY AUTHORITY AND APPROVAL OF PLANNED DOCUMENT SEVERANCE:</b>		
Authority / Delegated Authority review and approval of planned records / redactions completed:	Date:	Time Required:
Application of redactions completed:	Date:	Time Required:
Preparation of Paper copies (if applicable) completed:	Date:	Time Required: Printing / other costs:
Preparation of final disclosure package, including covering correspondence, to applicant, and final fees for provision of records for review by authority:	Date:	Time Required: Printing / other costs:
<b>APPROVAL OF DISCLOSURE PACKAGE:</b>		
Authority / Delegated Authority approves disclosure package and fees:	Date:	

**PART 8 – COLLECTION OF ADDITIONAL FEES (IF APPLICABLE)**

Finalizing fees for provision of records and provision of invoice to applicant:	Date:
Receipt of payment from applicant:	Date:

**PART 9 – RELEASE OF DISCLOSURE PACKAGE TO APPLICANT**

Provision of records (or access to records) to applicant:	Date:
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**PART 10 – POST-DISCLOSURE FILE MONITORING**

<b>TRACKING ANY REQUEST FOR REVIEW:</b>	
Confirmation of date for receipt of any request for review by OIPC:	Deadline Date:
Request for review Received by deadline:	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: Details re: follow up correspondence with applicant and OIPC.
<b>MONITORING A CONTINUING REQUEST:</b>	
Notes re: periodic review for the requirement for response to a continuing request:  (complete the necessary sections above to this form as required for documents relating to a continuing request)	
Correspondence to applicant confirming end of time for continuing request:	Date:
Request for review Received by deadline (end of continuing request):	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes: Details re: follow up correspondence with applicant and OIPC.

**PART 11 – FILE CLOSING**

Review of file for closing:	Date: Notes (if any):
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Signature of Authorized Representative:	
Date file Closed:	Date:

UNAPPROVED

**PART II - PROTECTION OF PRIVACY ACT AND  
PRIVACY MANAGEMENT PLAN (PMP)**

**10. Privacy Policy Statement – General**

(41) The Municipality recognizes the importance of protecting the privacy and confidentiality of Personal Information. The collection, use, and disclosure of Personal Information by the Municipality is governed by POPA.

**11. Purpose of the Privacy Management Plan**

(42) The purpose of this PMP is to ensure that the Municipality complies with POPA, and demonstrates accountability for the protection of the personal information in its custody or control. This plan establishes the structured framework for the collection, use, disclosure, retention, safeguarding, and disposal of Personal Information. It also addresses how the Municipality responds to requests to correct Personal Information, and to respond to Privacy Breaches and complaints. Lastly, this plan outlines the methods used to manage associated risk.

**12. Authority**

(43) This PMP is developed in accordance with:

- (a) POPA and its regulations;
- (b) Applicable directives and guidelines issued by the OIPC; and
- (c) Other relevant legislation or regulations governing municipal operations.

**13. Scope**

(44) This PMP applies to:

- (a) All Personal Information collected, used, disclosed, retained, or disposed of by the Municipality;
- (b) All municipal departments, boards, committees subject to POPA; and
- (c) All municipal employees, elected officials, contractors, service providers and others acting on behalf of the Municipality.

**14. Governance and Accountability**

(45) Council is responsible for:

- (a) Providing overall guidance and oversight for privacy compliance;
- (b) Approving privacy-related policies, including this PMP;
- (c) Designating the Head of the Public Body under POPA and ATIA by bylaw or resolution; and

- (d) Designating the Privacy Officer by bylaw or resolution.
- (46) The CAO is responsible for:
- (a) Overall municipal compliance with POPA; and
  - (b) Ensuring that adequate resources are allocated to privacy management.
- (47) The Privacy Officer is responsible for:
- (a) Being the designated Municipal employee responsible for the Municipality's compliance with POPA.
  - (b) To ensure compliance with POPA, the Privacy Officer will, without limitation:
    - (i) Be responsible for the development, implementation, and maintenance of the PMP;
    - (ii) Ensure that the tasks and responsibilities set out in the PMP are incorporated into organizational structure;
    - (iii) Establish and implement program controls;
    - (iv) Coordinate with other appropriate persons responsible for related disciplines and functions within the Municipality;
    - (v) Be responsible for the ongoing assessment and revision of program controls to ensure their effectiveness;
    - (vi) Oversee day to day operations of POPA;
    - (vii) Design and monitor training for staff;
    - (viii) Lead, or otherwise supervise, investigations into privacy incidents and assessments of the associated harm;
    - (ix) Report to senior leadership on compliance with POPA and any privacy risks and mitigation strategies;
    - (x) Represent the Municipality in the event of a complaint investigation by the OIPC;
    - (xi) Advocate privacy within the Municipality; and
    - (xii) Maintain comprehensive documentation of all privacy incidents, including documentation of the Municipality's investigations and actions further to the Municipality's Privacy Incident Assessment and Response Procedure.
- (48) All municipal employees, officials, and agents are responsible for:
- (a) Complying with POPA, municipal privacy policies, and this PMP;

- (b) Protecting Personal Information, data derived from Personal Information, and non-personal data accessed in the course of their duties;
  - (c) Completing any required training;
  - (d) Reporting suspected or actual Privacy Breaches immediately; and
  - (e) Cooperating with any investigation process respecting a suspected or actual Privacy Breach.
- (49) Delegation of specific authorities under POPA is outlined in the Delegation Table at **Appendix 2.1**.
- (50) Notwithstanding the delegation of authorities at **Appendix 2.1**, the Head of the Municipality retains full authority to exercise any duty, power, or function, under POPA at any time.

## 15. Collection and Use of Personal Information

- (51) Collection.
- (a) The Municipality collects Personal Information only when it is directly related to and necessary for the administration of municipal programs, services or activities.
  - (b) Wherever possible, and unless otherwise permitted under POPA, the Municipality will collect Personal Information directly from the individual to whom it relates and will provide notice of the purpose for which the information is being collected.
  - (c) The Municipality will provide a collection notice at the time of collecting Personal Information. This will ordinarily be in writing on the form that is used to collect the information. However, it may be provided verbally such as during a telephone call or during an in-person conversation.
  - (d) The default collection notice is as follows, but this may be adapted to account for the specifics of any particular form or circumstance:

***The personal information collected in this form is collected under the authority of the Protection of Privacy Act and the Municipal Government Act, and is used for the purposes of administering municipal programs and services. If you have questions about the collection of this information, contact the Municipality's Privacy Officer, Wendy Wildman, at 780-967-0271, or wendy@wildwillowenterprises.com.***

- (e) If, at the time of collection, the Municipality intends to input Personal Information into an Automated System to generate content or make decisions, recommendations, or predictions, this needs to be specified

in the collection notice. The template collection notice where automated systems will be used is as follows, but may be adapted to account for the specifics of the particular form or circumstance:

***The personal information collected in this form is collected under the authority of the Protection of Privacy Act and the Municipal Government Act and is used for the purposes of administering municipal programs and services. It will be entered into an automated system to [describe use such as to generate content or to make decisions, recommendations or predictions]. If you have questions about the collection of this information, contact the Municipality's Privacy Officer, Wendy Wildman, at (780)967-0271, or wendy@wildwillowenterprises.com.***

- (52) Consent to the Collection, Use and Disclosure of Personal Information.
- (a) General. The Municipality may obtain consent to the collection, use, or disclosure of Personal Information from individuals by written, oral, and electronic means.
  - (b) Written Consent. Written consent may be obtained through forms, applications, agreements, or other documents or correspondence signed by the individual giving the consent.
  - (c) Oral Consent.
    - (i) Oral consent may be obtained in person or by telephone in accordance with this policy provided that the individual providing the consent communicates agreement to providing oral consent.
    - (ii) Oral consent may be obtained where the information being collected, used or disclosed, is of a non-sensitive nature. For the purposes of this policy, non-sensitive Personal Information means personal information about an individual that, if disclosed without authorization would not normally result in significant harm, distress, or risk to the individual. This type of information is typically required for routine municipal services, communication and administrative functions.
    - (iii) Examples of non-sensitive Personal Information in the normal course of operations includes basic contact information, service-related information (such as garbage requests), participation and engagement information, or routine communication such as relating to requests for information or services.

(iv) Where oral consent is obtained, the person receiving the consent must either make a written record such consent including the date, method, and substance of the oral consent, or have an audio recording created to document the consent.

(d) Electronic Consent. Electronic consent may be obtained through email, online forms, or other electronic systems where the individual's consent is clearly expressed through an affirmative action (such as selecting an "I agree" option or submitting information electronically), or by the use of an electronic signature consistent with the requirements of the *Electronic Transactions Act*, in all cases where an audit trail can be maintained or obtained of the electronic system used.

(53) Use. Personal Information will be used only for the purposes for which it was collected, or for a use consistent with those purposes.

(54) Disclosure. Disclosure of Personal Information to third parties will occur only where permitted or required by law.

(55) Safeguarding. The Municipality is committed to maintaining appropriate physical, technical, and administrative safeguards to protect Personal Information against loss, unauthorized access, collection, use, disclosure or modification. Access to Personal Information is limited to authorized municipal employees, officials, or agents who require such access to carry out their duties.

(56) Accountability. The Municipality remains accountable for compliance with applicable privacy laws. However, privacy should be seen as more than that. Privacy should be seen in terms of improving processes, stakeholder relationship management, and reputation.

## **16. Data Matching and Data Derived from Personal Information**

(57) Data Matching. This means linking Personal Information between two or more databases or other electronic sources of information.

(58) Data Derived from Personal Information. This means data from Personal Information created by Data Matching and which identifies any individual whose Personal Information was used in the Data Matching. Here, the Personal Information in the data must still be identifiable.

(59) The following applies to Data Matching and Data Derived from Personal Information:

(a) Collection. Under POPA<sup>4</sup>, the Municipality may not collect Personal Information directly from an individual for the purposes of Data

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<sup>4</sup> See section 17(3) of POPA.



Matching. The Municipality may only carry out Data Matching activities with Personal Information it collects from another public body, or information that it already has under its custody or control.

(b) Use. Since the authority to conduct Data Matching is prescribed by POPA<sup>5</sup>, the Municipality may only conduct Data Matching for permitted purposes. The permitted purposes are:

(i) Research and Analysis. Here, research means systemic investigation and analysis or study of materials or sources to establish facts or to verify theories. Analysis means the process of examining and interpreting collected information to identify patterns, relationships and trends and may include breaking data down into smaller parts, assessing findings, and drawing conclusions;

(ii) Service Delivery. This means planning, administering, delivering, managing, monitoring, or evaluating a Municipal program or service; and

(iii) Other prescribed purposes allowed by regulation<sup>6</sup>.

(c) Disclosure. Unless an exemption exists under POPA<sup>7</sup>, Data Derived from Personal Information may not be disclosed. This includes in response to a formal access for information request under ATIA. The exemptions under POPA for disclosure are the following:

(i) Disclosure back to another public body that originally provided Personal Information if that public body requires it for the purpose it was created;

(ii) Disclosure to the Office of Statistics and Information under the *Office of Statistics and Information Act*.

(d) Retention and Destruction. It is important that this data be destroyed or changed into data that no longer identifies an individual as soon as is practical to protect it from unauthorized access, use or disclosure. Given this, the Municipality will destroy Data Derived from Personal Information, or will transform such data into Non-Personal Data, once the original purpose has been fulfilled<sup>8</sup>.

(e) Protection. The Municipality will carry out any Data Matching activities in accordance with the security protocols outlined in this policy and procedure manual.

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<sup>5</sup> See section 17(1) of POPA.

<sup>6</sup> There are currently no other prescribed purposes.

<sup>7</sup> See section 19(1) of POPA.

<sup>8</sup> See section 18(2) of POPA.

## 17. Non-Personal Data

(60) Non-Personal Data means data, including Data Derived from Personal Information, that has been generated, modified, or anonymized so that it does not identify any individual, and includes synthetic data and any other type of non-personal data that is identified in the regulations under POPA<sup>9</sup>.

(61) Creation.

(a) The Municipality may only create Non-Personal Data for purposes prescribed in POPA<sup>10</sup>, as follows:

- (i) For research and analysis;
- (ii) For planning, administering, delivering, managing, or evaluating a program or service; or
- (iii) For one or more purposes prescribed by regulation<sup>11</sup>.

(b) The Municipality may only use Personal Information or Data Derived from Personal Information if it is already in the custody or control of the Municipality. For certainty, this means that the Municipality cannot collect Personal Information from another public body to create Non-Personal Data unless it is an authorized collection.

(c) Non-Personal Data must be created in accordance with<sup>12</sup>:

- (i) Generally accepted best practices; and
- (ii) Requirements prescribed by regulation<sup>13</sup> including the establishment of a data quality assurance process that verifies and reviews the effectiveness of the methods used, ensures methods used can be replicated for auditing purposes, identifies and accounts for potential bias in the data, and ensures the accuracy and completeness of the data if it is to be used to inform decisions.

(62) Non-Personal Data Record. The Municipality will use appropriate measures to ensure that the Personal Information and/or data that is used to create the Non-Personal Data is protected and will maintain a record which confirms:

- (a) The description of the Personal Information and/or data to be used;
- (b) The purpose of the creation of the data;

<sup>9</sup> See section 1(n) of POPA.

<sup>10</sup> See section 21(1) of POPA.

<sup>11</sup> There are currently no other prescribed reasons.

<sup>12</sup> See section 21(3) of POPA.

<sup>13</sup> See section 5(1) of the Protection of Privacy (Ministerial) Regulation.

- (c) The method(s) used to de-identify the Personal Information or data;
  - (d) The steps taken to ensure that the identify of any individuals who are the subject of the Non-Personal Data cannot be re-identified from the data; and
  - (e) Any requirements prescribed by regulation.
- (63) Conditions Precedent to the Use or Disclosure of Non-Personal Data. Before use or disclosure of Non-Personal Data, the Municipality will conduct an assessment that<sup>14</sup>:
- (a) Ensures, to the extent possible, that the identity of any individual who is the subject of the Non-Personal Data cannot be identified or re-identified;
  - (b) Identifies the Security Classification Level of the created Non-Personal Data; and
  - (c) Identifies the level of risk of re-identification and the security measures in place to reduce that risk.
- (64) Use. The Municipality may use Non-Personal Data for any purpose.
- (65) Disclosure of Non-Personal Data. The Municipality will only disclose Non-Personal Data as follows:
- (a) The Municipality may disclose Non-Personal Data to another public body<sup>15</sup>;
  - (b) The Municipality may disclose a report, summary, or other publication that contains Non-Personal Data that is in aggregate or statistical form<sup>16</sup>; and
  - (c) The Municipality may disclose Non-Personal Data to a person other than another public body if all the following requirements are met<sup>17</sup>:
    - (i) The data is disclosed for the purpose of research and analysis (as defined above), for the purpose of planning, administering, delivering, managing, monitoring, or evaluating a municipal program or service, or for another purpose prescribed by the regulations;
    - (ii) The Head of the Public Body has approved conditions related to the security and confidentiality, limitations on re-identifications, and subsequent use or disclosure;

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<sup>14</sup> See section 5(2) of the Protection of Privacy (Ministerial) Regulation.

<sup>15</sup> See section 23(1)(a) of POPA.

<sup>16</sup> See section 23(3) of POPA.

<sup>17</sup> See section 23(1)(b) of POPA.

- (iii) The Head of the Public Body has approved conditions related to the destruction of the data; and
  - (iv) The approved conditions are documented in any agreement in writing.
- (d) Conditions for Security and Confidentiality. Approved conditions relating to the security and confidentiality of the Non-Personal Data to be incorporated into a written agreement should be specific to the particular project and include any policies or procedures that the Municipality considers relevant. However, the conditions should include the following:
- (i) The names of the individuals who will be given access to the data;
  - (ii) The requirement to adhere to the conditions contained in the agreement;
  - (iii) The data will be kept in a secure location;
  - (iv) The security classification(s) applicable to the data;
  - (v) The administrative, technical, and physical safeguards that must be used to protect the data;
  - (vi) Any audit procedures required to be performed in respect of the security and confidentiality measures, and how these will be made available to the Municipality for review;
  - (vii) Prohibition on actual or attempted re-identification of the Non-Personal Data;
  - (viii) Prohibition on the use or disclosure of the data without the express written consent of the Municipality;
  - (ix) That the failure to comply with the required conditions may result in the cancellation of the agreement and could result in liability for charges under section 60(1) of POPA; and
  - (x) Any other requirements unique to the particular project.

## **18. Security Classification System**

(66) The Municipality employs a security classification system. This is a structured framework used to categorize documents or data based on the sensitivity of the information contained and the level of protection required. By applying consistent classification rules, the Municipality can reduce the risk of unauthorized access or disclosure. It also assists employees in understanding their responsibilities when handling information.

## 19. Security Classification Levels

(67) The Municipality uses the following security classification levels:

Classification Level	Description	Example of Risk Impacts
<b>Public</b>	Applies to information assets that will not result in injury to individuals, governments, public bodies, or private sector institutions or entities and where financial loss will be insignificant	<ul style="list-style-type: none"> <li>No or minimal impact</li> <li>No or minimal inconvenience if not available</li> <li>No or minimal impact if lost or altered</li> </ul>
<b>Protected A</b>	Applies to information assets that, if compromised, could cause injury to an individual, organization, government, or public body.	<ul style="list-style-type: none"> <li>Unfair competitive advantage</li> <li>Disruption to business if not available or accessible</li> </ul>
<b>Protected B</b>	Applies to information assets that, if compromised, could cause serious injury to an individual, organization, government, or public body. **Data Derived from Personal Information shall be classified as <b>Protected B</b> unless the specific data warrants a higher classification, in which case <b>Protected C</b> will apply.	<ul style="list-style-type: none"> <li>Reputational impacts</li> <li>Loss of competitive advantage</li> <li>Loss of confidence in a municipal or official program</li> <li>Loss of privacy</li> <li>Loss of trade secrets or intellectual property</li> <li>Loss of opportunity</li> <li>Financial Loss</li> </ul>
<b>Protected C</b>	Applies to information assets that, if compromised, could cause grave injury to an individual, organization, government, or public body.	<ul style="list-style-type: none"> <li>Loss of life</li> <li>Loss of public safety</li> <li>Significant financial loss</li> <li>Compromise of legal system</li> <li>Compromise of protected confidences</li> <li>Destruction of partnerships and relationships</li> <li>Significant damage</li> </ul>

## 20. Storage and Access to Information

(68) The Municipality employs the following storage and access protocols based on the security classification level, as follows:

Classification Level	Storing Print / hard Media	Storing Digital Files	Access Restrictions
<b>Public</b>	<ul style="list-style-type: none"> <li>No special storage requirements</li> </ul>	<ul style="list-style-type: none"> <li>No special storage requirements</li> <li>Regular back-ups to ensure availability and integrity</li> </ul>	<ul style="list-style-type: none"> <li>Can be made open to the public, and all employees, contractors, and agents</li> <li>Can be published but not have to</li> </ul>

Classification Level	Storing Print / hard Media	Storing Digital Files	Access Restrictions
		<ul style="list-style-type: none"> <li>Cloud storage in Canada</li> </ul>	<ul style="list-style-type: none"> <li>be if it is of no value to the public</li> <li>Determination to publish material is made by the CAO</li> </ul>
<b>Protected A</b>	<ul style="list-style-type: none"> <li>Secure location (e.g. locked office, locked file room)</li> </ul>	<ul style="list-style-type: none"> <li>All media under physical and/or logical access based on authorization</li> <li>Cloud storage in Canada</li> <li>Server or network managed or monitored internally or with a third-party IT provider with an appropriate contract in place</li> <li>Encryption</li> </ul>	<ul style="list-style-type: none"> <li>Authorized access on a "need to know" based for business or duties related purpose</li> <li>Password authentication required</li> <li>Multi-factor authentication</li> </ul>
<b>Protected B</b>	<ul style="list-style-type: none"> <li>Secure location with restricted access</li> <li>Clean desk policy (desks are to be kept tidy and free of sensitive information when not in use and at the end of the day)</li> </ul>	<ul style="list-style-type: none"> <li>All media under physical and/or logical access based on authorization</li> <li>Secure electronic device policy (securing electronic devices when not in use, logging out or turning off at the end of the day)</li> <li>Cloud storage in Canada</li> <li>Server or network managed or monitored internally or with a third-party IT provider with an appropriate contract in place</li> <li>Encryption</li> </ul>	<ul style="list-style-type: none"> <li>Limited to individuals in a specific function, group or role</li> <li>Password authentication required</li> <li>Multi-factor authentication</li> </ul>
<b>Protected C</b>	<ul style="list-style-type: none"> <li>Stored in a highly secure zone with access tracking</li> </ul>	<ul style="list-style-type: none"> <li>All media under physical and/or logical access</li> </ul>	<ul style="list-style-type: none"> <li>Limited to named individuals / positions</li> </ul>

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Classification Level	Storing Print / hard Media	Storing Digital Files	Access Restrictions
	<ul style="list-style-type: none"> <li>• Clean desk policy</li> <li>• Audit trail for access points</li> </ul>	<ul style="list-style-type: none"> <li>• control of restricted zone</li> <li>• Secure electronic device policy</li> <li>• Cloud storage in Canada</li> <li>• Server or network managed or monitored internally or with a third-party IT provider with an appropriate contract in place</li> <li>• Encryption</li> </ul>	<ul style="list-style-type: none"> <li>• Password authentication required</li> <li>• Multi-factor authentication</li> </ul>

## 21. Accuracy and Retention

(69) Accuracy. Where an individual's Personal Information will be used by the Municipality to make a decision that directly affects the individual, including a decision made using an automated system, the Municipality will make every reasonable effort to ensure that the information is accurate and complete<sup>18</sup>.

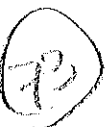
(70) Retention. The Municipality shall manage its records in a consistent, secure and legally compliant manner to ensure that municipal records are retained for appropriate periods in accordance with operational needs, legislative requirements, and best practices.

(71) This retention policy applies to all records created, received, or maintained by the Municipality regardless of format including, without limitation, paper records, electronic records, emails and other digital information.

(72) Records shall be retained and disposed of in a manner that:

- (a) Supports efficient municipal operations;
- (b) Protects the legal and financial interests of the Municipality;
- (c) Preserves records of historical or archival value; and
- (d) Complies with applicable Alberta legislation.

<sup>18</sup> See section 6(a) of POPIA.



- (73) If the Municipality has passed a bylaw regarding the destruction of records and documents in the Municipality<sup>19</sup>, the bylaw and the retention schedule outlined in that bylaw govern. For certainty, the following applies with respect to the destruction of records where such a bylaw authorizing destruction of records exists:
- (a) No record shall be destroyed unless it meets the requirements of the bylaw-approved retention schedule, an assessment has been completed to ascertain the value of retaining the record for any of the criteria above, and the record has been authorized for destruction.
  - (b) Records that have reached the end of the applicable retention period shall be reviewed for destruction. All records that are approved for destruction shall be destroyed in such a manner as to ensure confidentiality and prevent reconstruction.
  - (c) Destruction shall be completed in the presence of a witness. A record of destruction shall be maintained identifying the type of records destroyed, the date of destruction, the method used, and the names and signatures of the official completing the destruction and the witness.
- (74) Where Personal Information has been provided by an individual that is used to make a decision that directly affects the individual, the Municipality must retain that Personal Information for at least one year after using it to permit the individual an opportunity to obtain access to it.

## **22. Privacy Breaches**

- (75) Privacy incidents may result in significant harm to individuals, organizations and public bodies. The Municipality shall take appropriate steps to respond to privacy incidents.
- (76) Generally, the Municipality's response to a privacy incident will involve six steps, as follows:
- (a) Containment;
  - (b) Initial Reporting;
  - (c) Investigation and evaluation of risk;
  - (d) Notification;
  - (e) Additional measures; and
  - (f) Prevention.

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<sup>19</sup> See section. 214 of the MGA.

(77) The detailed procedure for responding to a privacy incident is outlined at **Appendix 3.2.**

### **23. Privacy Impact Assessment (PIA) Policy**

(78) A PIA is required when there is a new, or a substantial change to an existing, administrative practice, program project, or service that will involve the collection, use, or disclosure of Personal Information where one of the circumstances under the Protection of Privacy Ministerial Regulation 143/2025 applies.

(79) The current circumstances under the regulations are as follows:

- (a) The loss of, unauthorized access to, or unauthorized disclosure of, the Personal Information could result in significant harm;
- (b) One or more of the factors requiring the submission of a PIA to the OIPC apply, being:
  - (i) A practice, program, project or service will collect, use or disclose Personal information deemed to be of high sensitivity;
  - (ii) A practice, program, project or service will involve Personal Information of a significant percentage of the population the Municipality serves;
  - (iii) A practice, program, project or service will involve data matching between 2 or more public bodies;
  - (iv) A practice, program, project or service is part of a common or integrated program or service;
  - (v) A practice, program, project or service involves the development or use of innovative technology; and
  - (vi) The OIPC requests a copy of a privacy impact assessment.

(80) Given the above, the Municipality will consider whether a PIA is required when a practice program, project, or service:

- (a) Involves new or significantly changed collection, use, or disclosure of Personal Information;
- (b) Introduces new information systems or technologies;
- (c) Shares personal information with external organizations and/or service providers;
- (d) Involves surveillance, monitoring, or tracking technologies;

- (e) Involves sensitive Personal Information; or
  - (f) Poses a potential risk of privacy harm.
- (81) If any one or more of the above apply, the Privacy Officer must be consulted to determine whether a PIA is required.
- (82) If a PIA is required, the PIA shall be completed using the template at **Appendix 2.3** unless a different format is mandated by the OIPC.
- (83) If the Municipality is making a substantial change to an existing administrative practice, program, project, or service, and the Municipality has previously completed a PIA relating to that practice, program, project, or service, the existing PIA may be amended to account for the changes to the practice, program, project, or service.
- (84) The Municipality will submit the PIA to the OIPC if required (as outlined above). If the PIA relates to an agreement relating to the practice, program, project, or service, the portions of the applicable agreement relating to the protection of privacy must be submitted with the PIA. The Privacy Officer is the point of contact for submitting a PIA to the OIPC.

#### **24. Requests to Correct Personal Information**

- (85) Section 7 of POPIA outlines the rights and limitations of an individual to request a correction of their Personal Information held by the Municipality.
- (86) For certainty, the right is to **ASK** for a correction, not the right to have the correction made.
- (87) The Municipality will accept requests to correct personal information informally if the request relates to a simple matter that can be easily verified and addressed expeditiously. Examples of common requests of this type include change of phone number or change of address.
- (88) Where the request is not simple or it is not practical or expeditious to address a request informally, the Municipality will require that the request is made in writing using the Correction of Personal Information Form.
- (89) On receipt of a completed Correction of Personal Information Form, the following process applies:
- (a) The request will be reviewed to determine if the request relates to correction of Personal Information (which can be corrected) or an opinion (which there is no entitlement to correct).
  - (b) The request will be reviewed to determine if the request relates to the correction of information in the custody of, or originating from, another public body. In this case, the Municipality may transfer that request to

the originating public body and inform the requesting individual accordingly.

- (c) The request will be reviewed to assess whether appropriate and sufficient proof of the error has been provided, which must be of the same nature and quality as when the original collection took place.
  - (d) The request will be reviewed for whether there is a dispute respecting the facts in question, in which case the information will not be corrected.
  - (e) The request will be reviewed to assess whether making a correction is both pertinent to the subject matter and significant in its content.
  - (f) The request will be reviewed to assess whether it is necessary to inform other public bodies, groups of persons, persons, or organizations that have received the individual's Personal Information. Notification is required if the Personal Information has been shared in the year prior to the request for correction.
  - (g) The request will be reviewed to assess whether it relates to an opinion, which will not be corrected (although an individual can request that their views about that opinion be added to the record for other readers to consider).
- (90) If sufficient documentation has been provided to substantiate the requested correction, the request did not need to be transferred to another public body, there are no facts in dispute, the correction is pertinent and significant in content, third party notification is not required, and the matter does not relate to an opinion, the correction will ordinarily be made. Making such a correction means the following:
- (a) All records containing the Personal Information must be corrected with an annotation of the date of the correction, with such annotation to extend to records in information systems.
  - (b) The annotation should be dated and signed, or otherwise recorded electronically for electronic records.
  - (c) If necessary, a linking mechanism may be employed when Personal Information is stored on a medium that is difficult to update.
- (91) If the Municipality is not satisfied with the proof presented to substantiate the correction, the Municipality will not make the correction but will annotate or link the information presented to the original information.

- (92) If the Municipality determines that the request relates to opinion and not facts, the Municipality will not make the requested correction but will annotate or link the requesting individual's views to the record.
- (93) If third party notification is required, such notification should be completed within 30 business days unless the correction is not material, or the individual making the request agrees in writing.
- (94) If the Municipality receives notification of a correction to the Personal Information of an individual from another public body, the Municipality will update its records accordingly.
- (95) The Municipality will give written notice to the requesting individual of whether the correction has been made or not, and whether an annotation or linkage has been made, within 30 business days of receiving the request. If the request has been refused, the notice to the requesting individual will include notice that the OIPC has the power to review the decision.

## **25. Complaints**

- (96) The Municipality is committed to ensuring that all privacy complaints received are handled promptly, fairly, and in compliance with POPA.
- (97) The process for handling complaints outlined in this section relate both to complaints about how a complainant's personal information was collected, used or disclosed and to complaints about the Municipality's general practices and/or compliance with POPA.
- (98) Privacy-related complaints may be received verbally or in writing and shall be forwarded to the Privacy Officer. Every effort will be made to obtain a mail or email address for the complainant so that an acknowledgment of the complaint and response to the complaint can be provided in writing.
- (99) The Municipality will acknowledge receipt of the complaint in writing as soon as reasonably practicable.
- (100) The Privacy Officer will conduct a timely investigation into the complaint, which may include reviewing relevant records, interviewing staff, and assessing compliance with POPA and municipal policies. Employees shall cooperate fully with the investigation.
- (101) Upon completion of the investigation, the Municipality will:
  - (a) Inform the complainant of the outcome, subject to any confidentiality requirements, within 30 business days of receipt of the complaint. The response to the complainant shall also provide the information necessary to seek a review of the response to the complaint by the OIPC;

- (b) Take appropriate corrective action where a privacy breach or non-compliance has been identified (see the section in this PMP regarding response to privacy incidents); and
  - (c) Implement measures to prevent similar incidents in the future, including training or procedural changes.
- (102) All privacy complaints and related investigation records will be documented and retained in accordance with the Municipality's records retention policy.
- (103) The Municipality will not tolerate retaliation against an individual who, in good faith, raises a privacy concern or participates in a privacy investigation.

## **26. Automated Systems and Artificial Intelligence**

- (104) General. The Municipality is committed to being transparent, responsible, and ethical with respect to any use of Automated Systems and Artificial Intelligence Systems.
- (105) In addition to all legislated requirements, the Municipality will consider the following principles with respect to Automated Systems and Artificial Intelligence:
- (a) Ethics and Mitigation of Bias. The Municipality will actively consider ethical issues applicable to these systems and will assess and take steps to mitigate the effects of bias wherever possible.
  - (b) Trust. The Municipality will communicate about its use of these systems, and the methodology behind them, in a fully transparent manner.
  - (c) Human Responsibility. The Municipality will ensure personal accountability for all outputs, outcomes, and solutions from these systems.
- (106) Security and Technical Safeguards. The Municipality will employ the Security and Technical Safeguards associated with the Security Classification Systems identified in this PMP.

## **27. Training Requirements for Employees**

- (107) All new employees shall be provided with training respecting privacy and data security appropriate to their role and responsibilities. This shall be a mandatory portion of new employee orientation.
- (108) All employees shall participate in at least one session of privacy and data security training annually.

(109) The Privacy Officer shall curate, coordinate, and implement all training for employees.

(110) Completion of the required orientation and annual training shall be documented on employee personnel files.

**28. Training Requirements for Contractors, Volunteers or other Individuals providing services to the Municipality**

(111) Contractors, volunteers, or other individuals providing services to the Municipality may be required to participate in privacy training where appropriate.

(112) The Privacy Officer shall curate, coordinate, and implement all training for contractors, volunteers or other individuals providing services to the Municipality.

(113) The Privacy Officer shall keep records of all such training.

**29. Contract Requirements for Contractors and Third-Party Service Providers**

(114) All contractors and service providers engaged by the Municipality are required to protect Personal Information and maintain records in accordance with POPA and with the Municipality's document and records management policies.

(115) All municipal contracts must include provisions requiring contractors to:

- (a) Comply with all applicable privacy legislation and regulations;
- (b) Protect Personal Information and confidential municipal records from unauthorized access, use, disclosure, or loss;
- (c) Implement administrative, technical and physical safeguards consistent with municipal policies and recognized best practices;
- (d) Restrict access to municipal information to authorized personnel only;
- (e) Participate in any privacy training required by the Municipality; and
- (f) Immediately report any actual or suspected privacy breach or security incident to the Municipality's Privacy Officer.

(116) Template language for inclusion in municipal contracts is attached at **Appendix 2.4.**

(117) The Municipality will monitor contractor compliance and may take appropriate action, including contract termination, where a contractor fails to meet privacy requirements.

### **30. Personal Information Banks**

- (118) The Municipality must publish a directory, in printed or electronic form, that lists the Municipality's Personal Information Banks<sup>20</sup>.
- (119) The Municipality's directory shall include the following information in respect of all such Personal Information Banks:
  - (a) The title and location of the Personal Information Bank;
  - (b) A description of the kind of Personal Information and the categories of individuals whose personal information is included;
  - (c) The authority for collecting the Personal Information; and
  - (d) The purposes for which the Personal Information was collected or compiled and the purposes for which it is used or disclosed.
- (120) The template for the format of such directory is at **Appendix 2.5**.

### **31. Periodic Review of the Privacy Management Program**

- (121) This PMP shall be reviewed every three years.
- (122) The Privacy Officer shall lead the periodic review and shall provide a written report respecting the effectiveness of the program, any newly identified risks or trends affecting privacy, and recommending any changes to the program for Council approval.
- (123) The Privacy Officer may conduct or supervise reviews or portions of the PMP more regularly to evaluate its effectiveness. Such reviews may include, but are not limited to:
  - (a) Review of security measures such as passwords, multi-factor authentication processes, encryption measures, access controls or similar measures;
  - (b) Performing internal and external security assessments; and
  - (c) Penetration testing or other vulnerability assessments.

### **32. Access to the Privacy Management Program by the Public**

- (124) The Municipality will make the Municipality's PMP available to the public on request. The Municipality may withhold any technical information (such as security-related information) contained in the PMP that could compromise the security of Personal Information within the Municipality's custody or control.

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<sup>20</sup> See section 57(2) of POPA.

(125) The Municipality will provide a copy of the PMP or provide instructions as to where to access a copy (such as, if applicable, on the Municipality's website) within 30 business days of the request.

**33. Privacy Policy Statement – Website**

(126) A statement respecting the Municipality's Privacy Policy, including specific policies respecting the website itself shall be included on the Municipality's website. The current text for such statement is outlined at **Appendix 2.6.**

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**APPENDIX 2.1 – POPA DELEGATION OF AUTHORITY TABLE**

<b>Duty, power or function of Head</b>	<b>Section reference</b>	<b>Retained by Head</b>	<b>Delegated to Privacy Officer</b>	<b>Delegated to other person(s) (provide title(s) – specific or generic)</b>
<b>Collection, Correction, Protection of Personal Information</b>				
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		



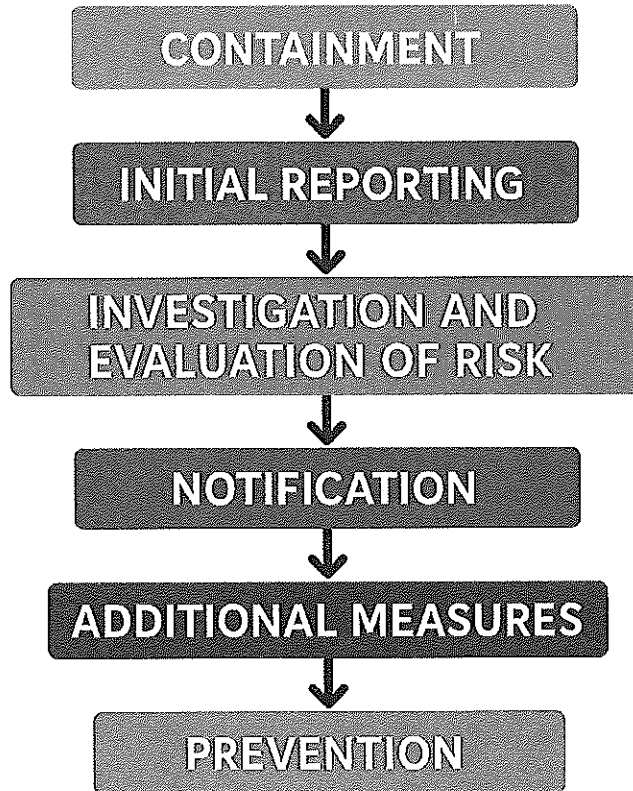
Duty, power or function of Head	Section reference	Retained by Head	Delegated to Privacy Officer	Delegated to other person(s) (provide title(s) - specific or generic)
<b>Use and Disclosure of Personal Information</b>				
Establishing rules for electronic consent	Regulation 2(4)(a)		X	
Establishing rules 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	
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		
<b>Reviews and Complaints</b>				
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	44	X		

Duty, power or function of Head	Section reference	Retained by Head	Delegated to Privacy Officer	Delegated to other person(s) (provide title(s) - specific or generic)
Order				
<b>General Provisions</b>				
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	
<b>Collection, Accuracy and Retention of Personal Information</b>				
Establishing controls over the collection, use and disclosure of personal information	2(a)	X		
Authorizing routine correction of personal information	2(b)			X (name positions - reception, administrative assistant, tax clerk, etc.)
Ensuring authorized purpose of collection	4	X		
Assuring proper collection and notification	5		X	
Assuring accuracy of personal information	6(a)		X	

Duty, power or function of Head	Section reference	Retained by Head	Delegated to Privacy Officer	Delegated to other person(s) (provide title(s) – specific or generic)
Applying retention standards	6(b)	X		
<b>Use and Disclosure of Personal Information</b>				
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 Regulation (MIN) 5(1)	X		
Assuring appropriate use and disclosure of non-personal data	22, 23 Regulation (MIN) 5(2)	X		

**APPENDIX 2.2 - PRIVACY INCIDENT ASSESSMENT AND RESPONSE  
PROCEDURE**

The Municipality's Privacy Incident Assessment and Response Procedure is based on the following framework:



**34. Step 1 – Containment. As soon as an incident is identified, limiting the extent and impact of the incident is a priority.**

(127) Municipal employees shall notify their supervisor immediately and take necessary actions to immediately contain and document the details of the incident.

(128) Common types of incidents and containment practices are outlined below:

Potential Incident	Potential Containment Actions
Misdirected email to wrong person / unintended recipient	<ul style="list-style-type: none"> <li>Request an email recall (if function is available)</li> <li>Where a group email includes an unintended recipient, remove the recipient, resend email</li> </ul>

Potential Incident	Potential Containment Actions
	<p>to staff with request to delete and not respond to the original email</p> <ul style="list-style-type: none"> <li>• Contact unintended recipient, advising information was sent in error and requesting them to delete the email (double delete, to include deleting from trash). Confirm information was not read and no copies were made</li> </ul>
Documents mailed or otherwise sent to the wrong party	<ul style="list-style-type: none"> <li>• Contact unintended recipient and request records be returned or destroyed</li> </ul>
Municipal employee uploads documents for one client or party into the wrong file	<ul style="list-style-type: none"> <li>• Restrict access or delete the information from the uploaded information</li> <li>• Review to confirm the correct personal information is placed on the correct file</li> <li>• Contact the unintended recipient and request them to delete it at their end (if possible)</li> <li>• Confirm no copies of the information were made or retained</li> </ul>
A Municipal employee's laptop or cell phone is lost or stolen	<ul style="list-style-type: none"> <li>• Contact the appropriate team (IT, for example) to request device be remotely wiped and request confirmation that if any attempts at log-in were made after last known use</li> <li>• Contact law enforcement to report theft</li> </ul>
A Municipal employee accesses third party personal information (such as family members, friends, neighbours, etc.) on a municipal database or file system	<ul style="list-style-type: none"> <li>• Restrict access to the files</li> <li>• Restrict access for the employee to any information</li> </ul>
Potential inadvertent destruction of personal information records	<ul style="list-style-type: none"> <li>• Confirm and investigate missing records</li> <li>• Determine if missing records were inadvertently destroyed</li> <li>• Assess any potential back-up files</li> </ul>

(129) Other municipal areas or departments that need to be involved to assist with containment should be identified and contacted. This could include system administrators, IT service providers, etc.

**35. Step 2 – Initial Reporting. Timely reporting of a privacy incident is critical to ensure prompt containment and a thorough investigation. The following is required:**

(130) Report the incident to the Municipality's Privacy Officer, with all relevant details. If it is not clear whether the situation actually reflects a privacy incident, it still must be reported so that this determination can be made.

(131) Contact the appropriate team or department if the incident involves an IT system (for example, the IT service provider or system administrator).

(132) If the privacy incident involves suspected theft or other criminal activity, contact the appropriate police agency.



(133) If there is uncertainty as to the parties to be contacted, contact the Privacy Officer.

(134) If the privacy incident could result in a claim against the Municipality for which an insurance claim might be made, or the Municipality has insurance which provides services related to privacy breaches, consider notifying the Municipality's insurer after consultation with legal counsel.

**36. Step 3 – Investigation and Evaluation of Risk. It is critical that the incident be thoroughly investigated to assess the risk involved in the incident.**

(135) The Privacy Officer is the lead unless determined otherwise.

(136) The Privacy Officer must consider whether legal counsel should be consulted.

(137) The Privacy Officer (and/or legal counsel) should:

(a) Gather all relevant information to determine the nature and extent of the incident.

(b) Evaluate whether the incident meets the threshold for a real risk of significant harm to an individual (in accordance with section 10(2) of POPIA) and prepare an analysis of the harm assessment. This involves the factors outlined in section 4(1) and 4(2) of the Protection of Privacy (Ministerial Regulation). Generally, these include:

(i) Actual or potential misuse of the Personal Information;

(ii) Whether the loss of or unauthorized access or disclosure of Personal Information occurred because of a malicious intent;

(iii) The sensitivity of the Personal Information; and

(iv) The mitigation measures taken or other factors that reduce the risk of significant harm, with "significant harm" including bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, identity theft, negative effects on insurability or credit record, damages to or loss of property, or other legal harm or financial loss.

(c) If other relevant factors exist that are not outlined in the regulations, they should also be considered in the assessment. These may include such factors as:

(i) The number and type of individuals impacted;

(ii) The safeguards in place when the incident occurred; and

- (iii) The type of unauthorized recipient and the relationship between the recipient and the impacted individual(s).
- (d) Refer to current OIPC guidance or fact sheets to assist with the risk assessment (<https://oipc.ab.ca/breach-notification/#public-bodies-popa> )
- (e) Assess whether to contact the OIPC office for assistance with determining risk, which they may do on a case-by-case basis.
- (f) Provide the Municipality with recommendations for the next steps including:
  - (i) Notification requirements;
  - (ii) Additional mitigation measures; and
  - (iii) Preventative measures to prevent recurrence or future incidents.

**37. Step 4 – Notification. The results of the investigation and harm assessment completed in Step 3 will determine whether notification is mandatory under POPA.**

(138) If it is determined that the privacy incident **MEETS** the threshold of “real risk of significant harm”, including where the incident involves data derived from Personal Information, then the following applies:

- (a) The Municipality is required to give notice to:
  - (i) The impacted individual(s);
  - (ii) The Commissioner; and
  - (iii) The Minister responsible for POPA.<sup>21</sup>
- (b) Advice from the Privacy Officer and/or Municipal Legal Counsel should be obtained prior to giving the notices outlined further in this section.
- (c) Written notice shall be given without unreasonable delay by one of the authorized methods listed in section 53 of POPA, being:
  - (i) By sending it to that person by prepaid mail to their last known address;
  - (ii) By personal service;
  - (iii) By substitutional service if so authorized by the Commissioner;
  - (iv) By fax; or

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<sup>21</sup> Currently the Minister of Technology and Information

(v) By electronic form other than fax if that person's contact information for that electronic form is publicly available or has been provided by that person.

(d) The Written notice to an individual must contain all the following information:

- (i) The Municipality's name;
- (ii) A description of the circumstances of the loss of, unauthorized access to, or unauthorized disclosure of the Personal Information;
- (iii) The date on which or period during which the loss or unauthorized access or disclosure occurred, or is thought to have occurred;
- (iv) The date on which the loss or the unauthorized access or disclosure was discovered;
- (v) A general description of the type of Personal Information that was lost or that was the subject of the unauthorized access or disclosure;
- (vi) A description of the steps the Municipality has taken to reduce the risk of harm to individuals as a result of the loss, unauthorized access to, or unauthorized disclosure of Personal Information;
- (vii) The contact information for the Municipal representative who can respond, on behalf of the Municipality, to questions, who will normally be the Privacy Officer;
- (viii) Notice of the individual's right to request a review by the Commissioner under section 37 of POPA; and
- (ix) Any other information the Municipality considers relevant.

(e) The written notice to the Commissioner must contain all the following information (see their forms for notice purposes at: <https://oipc.ab.ca/breach-notification/#public-bodies-popa>):

- (i) The Municipality's name;
- (ii) A description of the circumstances of the loss of, unauthorized access to, or unauthorized disclosure of the Personal Information;
- (iii) The date on which or period during which the loss or unauthorized access or disclosure occurred, or is thought to have occurred;
- (iv) The date on which the loss or unauthorized access or disclosure was discovered;
- (v) The manner in which the loss or the unauthorized access or disclosure was discovered and, if applicable, the physical location of the loss or the unauthorized access or disclosure;

- (vi) The date on which or period during which the loss or the unauthorized access or disclosure ended or is thought to have ended;
  - (vii) A general description of the type of Personal Information that was lost or that was the subject of the unauthorized access or disclosure;
  - (viii) A general description of the Municipality's assessment of the risk of harm to individuals resulting from the loss of, unauthorized access to, or unauthorized disclosure of Personal Information;
  - (ix) The number of, or an estimate of the number of, individuals for whom there is a real risk of significant harm as a result of the loss of, unauthorized access to, or unauthorized disclosure of Personal Information;
  - (x) A description of the steps the Municipality has taken to reduce the risk of harm to individuals as a result of the loss, unauthorized access to, or unauthorized disclosure of Personal Information;
  - (xi) A description of measures the Municipality has taken to prevent a similar loss of, unauthorized access to, or unauthorized disclosure of Personal Information;
  - (xii) An example of the notice provided by the Municipality to the individual(s) for whom there exists a real risk of significant harm;
  - (xiii) Contact Information for the Municipal representative who can respond on behalf of the Municipality to questions from the Commissioner; and
  - (xiv) Any other information the Municipality considers relevant.
- (f) The written notice to the Minister must contain all the following information:
- (i) The Municipality's name;
  - (ii) A description of the circumstances of the loss of, unauthorized access to, or unauthorized disclosure of the Personal Information;
  - (iii) The date on which or period during which the loss or unauthorized access or disclosure occurred, or is thought to have occurred;
  - (iv) The date on which the loss or unauthorized access or disclosure was discovered;
  - (v) A general description of the type of Personal Information that was lost or that was the subject of the unauthorized access or disclosure;

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(vi) The number of, or an estimate of the number of, individuals for whom there is a real risk of significant harm as a result of the loss of, unauthorized access to, or unauthorized disclosure of Personal Information;

(vii) Any other information the Municipality considers relevant.

(139) If it is determined that the privacy incident **DOES NOT MEET** the threshold of "real risk of significant harm" then the following applies:

(a) The Municipality is not required to notify the impacted individual(s) but may still choose to notify the impacted individual(s) as a best practice which promotes transparency, accountability, and further minimization of harm that an incident may cause.

(b) The Municipality is not required to notify the Commissioner or the Minister. However, the Municipality may voluntarily report to the Commissioner.

(c) In determining whether or not to notify, advice from the Privacy Officer and Municipal legal counsel should be sought.

(d) If notice is given voluntarily, the content of the notice should align with the content required for mandatory notice.

### **38. Step 5 – Additional Measures**

(140) Additional measures may be appropriate depending on the nature of the incident. The advice of the Privacy Officer and/or Municipal legal counsel should be sought in this respect.

(141) Examples of additional measures that the Municipality could consider include, without limitation, the following:

(a) Providing credit monitoring services;

(b) Providing identity theft protection services;

(c) Providing guidance on protective actions that could be taken; and

(d) Providing ongoing updates.

### **39. Step 6 – Prevention**

(142) After the investigation into an incident has occurred, the Municipality will evaluate and take measures to minimize the risk of similar privacy incidents from occurring.

(143) Without limitation, the following will be considered after any incident:

(a) Whether policies or procedures need to be revised;

(b) Whether security safeguards should be improved;

- (c) Whether additional training is required for staff or others; and
- (d) Whether the incident reflects any kind of trend or change in privacy risk assessment.

(144) The Municipality will keep records of all privacy incidents. The Privacy Officer shall maintain these records.

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**APPENDIX 2.3 - PRIVACY IMPACT ASSESSMENT**

**PART 1: GENERAL INFORMATION**

PIA file number: \_\_\_\_\_

<b>Initiative title:</b>	
<b>Municipality:</b>	
<b>Department or Group:</b>	
<b>Your name and title:</b>	
<b>Your work phone:</b>	
<b>Your email:</b>	
<b>Initiative Lead name and title:</b>	
<b>Initiative Lead phone:</b>	
<b>Initiative Lead email:</b>	
<b>Privacy Officer:</b>	
<b>Privacy Officer phone:</b>	
<b>Privacy Officer email:</b>	

General information about the PIA:

<p><b>If this PIA is required to be completed under <u>section 7(5) of the Protection of Privacy (Ministerial) Regulation (Alberta Regulation 143/2005)</u>, you must submit this PIA to the <u>Office of the Information and Privacy Commissioner</u>. If the PIA relates to an agreement relating to the practice, program, project or service, the portions of the agreement must be submitted with the PIA.</b></p>
<b>Related PIAs, if any:</b>

**40. What is the initiative (the practice, program, project, or service)?**

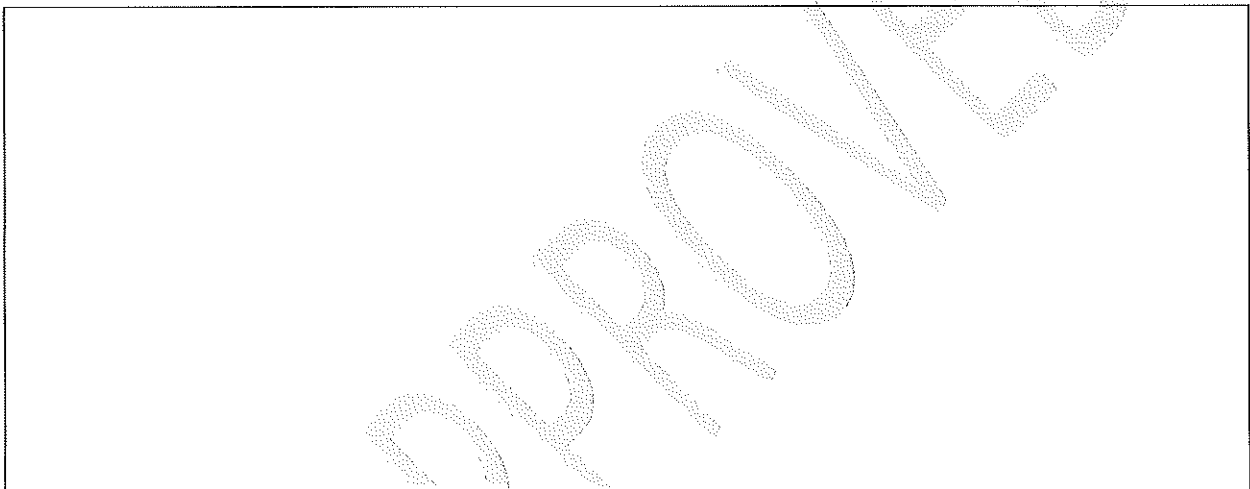
**Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you're doing, how it works, who is involved and when or how long your initiative runs. Confirm the purpose of the collection, use, or disclosure of personal information (or the change to the existing practice, program, project, or service)**

**41. What is the scope of the PIA?**

**Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?**

42. What are the types of information that will be collected, used or disclosed in this initiative?

Please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in a table below or in an appendix.



3.1 Did you list personal information in question 3?

**Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference.**

Type "yes" or "no" to indicate your response.

- If yes, go to Part 2
- If no, answer question 4 and submit questions 1 to 4 to your Privacy Officer.
- You do not need to complete the rest of the PIA template.

43. How will you reduce the risk of unintentionally collecting personal information?

**Some initiatives that do not require personal information are at risk of collecting personal information inadvertently, which could result in an information incident.**

**PART 2: COLLECTION, USE AND DISCLOSURE**

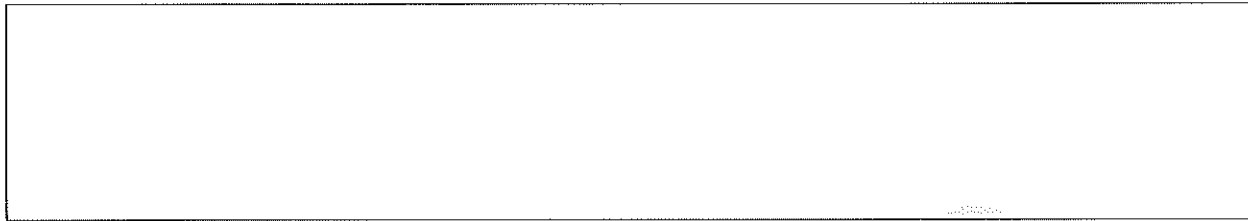
This section will help you identify the legal authority for collecting, using and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

**44. Collection, use and disclosure**

Use column 2 to identify whether the action in column 1 is a collection, use or disclosure of personal information. Use columns 3 and 4 to identify the legal authority you have for the collection, use or disclosure.

Use this column to describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	Collection, use or disclosure	POPA, MGA, or other authority	Other legal authority
Step 1:			
Step 2:			
Step 3:			
Step 4:			

**Optional:** Insert a drawing or flow diagram here or in an appendix if you think it will help to explain how each different part is connected.



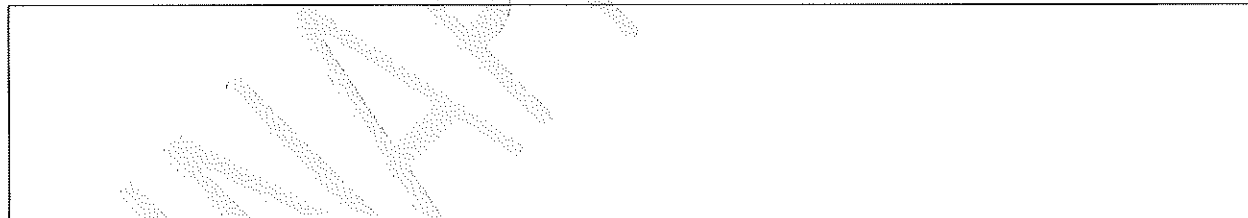
**45. Collection Notice**

**If you are collecting personal information directly from an individual the information is about, you must provide a collection notice (except in limited circumstances).**

A sample collection notice follows:

***Personal information is collected under the authority of the Protection of Privacy Act and the Municipal Government Act, and is used for the purposes of administering municipal programs and services. If you have questions about the collection of this information, contact the Municipality's Privacy Officer, [Name], at [Telephone], or [Email].***

Write your collection notice below. You can also attach the notice as an appendix.



**PART 3: ASSESSMENT OF PRIVACY RISKS AND MITIGATION STRATEGIES**

The purpose of this section is to assess the privacy risks associated with the initiative and to outline the mitigation strategies that will be used to address those risks.

**46. Outline the privacy risks associated with this initiative and their mitigation strategies in the table below**

Use this column to describe the identified privacy risks for Personal Information	Mitigation Strategies
Risk 1:	
Risk 2:	
Risk 3:	
Risk 4:	

**PART 4: SAFEGUARDS IN PLACE TO PROTECT PERSONAL INFORMATION**

The purpose of this section is to outline the administrative, physical or technical safeguards that will be in place to protect the personal information, including how the personal information will be securely transmitted, matched or linked by the Municipality.

**Administrative safeguards** are a policy, procedure or practice to manage the Municipality's conduct that protects the privacy of personal information, data derived from personal information, and non-personal data. **Physical safeguards** are a measure to protect the Municipality's physical assets, including electronic information systems from natural and environmental hazards and unauthorized intrusion. **Technical safeguards** are measures to protect the Municipality's electronic information and access to it.

**47. Does your initiative involve digital tools, databases or information systems?**

Type "yes" or "no" to indicate your response.



- If yes, work with your Privacy Officer to determine whether you need a security assessment to ensure the initiative meets the reasonable security requirements of section 10(1) of POPA.

If you have had a security assessment completed that relates to the initiative, you may wish to attach that assessment to this PIA as an appendix.

**48. Outline safeguards in the chart below**

Type of Safeguard	Description
<b>Administrative Safeguards</b> (Ex: policies, training, role-based access, internal controls, etc.)	
<b>Physical Safeguards</b> (Ex: restricted access offices, visitor procedures, alarm systems, access logs, privacy screens, locked rooms or cabinets, etc.)	
<b>Technical Safeguards</b> (Ex. User IDs, multi-factor authentication, firewalls, encryption, system access logs, VPNs, password standards, etc.)	
<b>Transmission, Matching and Linking.</b> (Special Notes on how personal information will be securely transmitted, matched or linked by the Municipality (if applicable)).	

Type of Safeguard	Description
Other	

**PART 5: ACCURACY, CORRECTION AND RETENTION PROCEDURES**

The purpose of this part is to describe the accuracy, correction, and retention procedures that will be implemented to ensure the personal information is accurate and complete.

**49. Describe the accuracy, correction, and retention procedures in the table below?**

Issue	Procedures to be implemented
Accuracy	
Correction	
Retention	

**PART 6: GOVERNANCE STRUCTURE WHERE 2 OR MORE PUBLIC BODIES ARE ENGAGING IN A COMMON OR INTEGRATED PROGRAM**

Complete this part if 2 or more public bodies are engaging in a common or integrated program or service or if the Municipality is collecting personal information from another public body for the purpose of carrying out data matching. "Data matching"

means linking personal information between 2 or more databases or other electronic sources of information.

**50. Provide a description of the governance structure that confirms the responsibilities and accountability of each public body?**

Item	Description
<b>Governance Structure</b>	
<b>Responsibilities and Accountability for Public Body 1</b>	
<b>Responsibilities and Accountability for Public Body 2</b>	
<b>Other Details</b>	

**PART 6: OTHER RELEVANT DETAILS**

**51. Provide any other relevant details respecting the Initiative not covered in the sections above.**

Issue	Comments / Details

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Issue	Comments / Details

**PART 7: SIGNATURES**

You have completed a PIA. Submit the PIA to your Privacy Officer for review and comment, and then have the PIA signed by those responsible for the initiative.

**Privacy Officer Comments**

Issue	Comments

**Privacy Officer Signatures**

This PIA is based on a review of the material provided to the Privacy Officer as of the date below.

Role	Name	Electronic signature	Date signed
<b>Privacy Officer / Privacy Office Representative</b>			

**Initiative Lead Signatures**

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Officer and if necessary, complete a PIA update.

Initiative Lead Comments:

Issue	Comments

Role	Name	Electronic signature	Date signed
<b>Initiative lead</b>			
<b>Program/Department Manager</b>			
<b>Contact Responsible for Systems Maintenance and/or Security</b> Only required if they have been involved in the PIA			
<b>Head of public body, or designate</b> (if required)			

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## APPENDIX 2.4 - TEMPLATE CONTRACT TERMS FOR MUNICIPAL CONTRACTS

### **Privacy, Confidentiality, and Records Protection**

The Contractor shall comply with all applicable privacy and access legislation, including the Protection of Privacy Act.

The Contractor shall protect all personal information and all records of the Municipality from unauthorized access, use, disclosure, modification, loss, or destruction and shall implement administrative, technical, and physical safeguards consisted with the Municipality's policies and procedures and industry best practices.

The Contractor shall ensure that access to municipal information and records is limited to only those employees or agents of the Contractor who require such access for the performance of the services and who are bound by confidentiality obligations.

The Contractor shall participate in any privacy training required by the Municipality.

The Contractor shall immediately notify the Municipality, through the Municipality's Privacy Officer, of any actual or suspected privacy breach, security incident, or unauthorized access involving municipal information or records, and shall cooperate fully in any investigation.

Upon completion or termination of this Agreement, the Contractor shall promptly return all municipal records and information.

The obligations set out in this section shall survive the termination or expiry of this Agreement.

**APPENDIX 2.5 – PERSONAL INFORMATION BANK DIRECTORY TEMPLATE**

Personal Information Bank	Location	Information Maintained	Individuals	Use	Legal Authority
Example: Employee Files	Human Resources	May include name, contact information, social insurance number, date of birth, dependent information, supervisory checklists, work records, benefits administration, performance appraisals, security clearance information, banking information, disciplinary information training records, certifications, certificates	Employees	To pay, manage, provide benefits to, train and develop employees and prepare human resource reports.	POPA s. 4(c), MGA

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## APPENDIX 2.6 – POPA WEBSITE NOTICE

### Privacy Policy

By using the Municipality's website, you accept the practices outlined in this Privacy Policy. If you do not agree with the Privacy Policy, do not use this website.

The Municipality recognizes the importance of protecting the privacy and confidentiality of Personal Information. The collection, use, and disclosure of Personal Information by the Municipality is governed by the *Protection of Privacy Act* (POPA).

The Municipality collects Personal Information only when it is directly related to and necessary for the administration of municipal programs, services or activities. Wherever possible, the Municipality will collect Personal Information directly from the individual to whom it relates and will provide notice of the purpose for which the information is being collected.

Personal Information will be used only for the purposes for which it was collected, or for a use consistent with those purposes.

Disclosure of Personal Information to third parties will occur only where permitted or required by law.

The Municipality is committed to maintaining appropriate physical, technical, and administrative safeguards to protect Personal Information against loss, unauthorized access, collection, use, disclosure or modification. Access to Personal Information is limited to authorized municipal employees, officials, or agents who require such access in order to carry out their duties.

The Municipality remains accountable for compliance with applicable privacy laws. However, privacy should be seen as more than that. Privacy should be seen in terms of improving processes, stakeholder relationship management, and reputation.

### Website

The Municipality is committed to providing visitors to its website with a site that respects their privacy. This page provides a summary of the Municipality's website privacy practices.

We do not automatically gather any personal information from you such as your name, email address, residential address, or phone number. Such personal information is only obtained if you provide it voluntarily by contacting us through email or by accessing a secure portion of the website. Any personal information that you do provide to the Municipality is protected under POPA.

Personal information that is collected from you will be used only for the purposes for which it was collected, or for a purpose consistent with those purposes. The Municipality may disclose such personal information as required or permitted by law.

The Municipality endeavours to protect personal information. However, communication over the internet can be intercepted. You are not required to communicate with the Municipality over the internet. You can contact the Municipality by phone, in person, or by mail.

We may use software that receives and records the Internet Protocol (IP) address of the computer that has contacted our website. We do not attempt to link these addresses to the identity of persons visiting the website. However, we may do so if the Municipality has reason to believe that doing so is necessary to investigate, contact, or pursue legal action against someone who may be causing harm to, or interfering with, the Municipality's rights, property, other users, or anyone else.

This website may use cookies and tracking technology which is useful for gathering information about such matters as browser type or operating system, and the number of visitors to the website. Personal information is not collected via cookie or tracking technology. You may have the option to accept or refuse cookies related to your use. If you choose to refuse cookies related to this website, you may not be able to use portions of the website.

By using the Municipality's website, you consent to the Municipality collecting, using, and disclosing your personal information as described above.

### **Disclaimer Respecting Links to Other Sites and Other Matters**

This website may have links to other sites. The Municipality is not responsible for the content and the privacy practices of other websites.

### **Changes to the Privacy Policy**

The Municipality reserves the right to amend this Privacy Policy from time to time. Any changes are effective immediately after they are posted on this website. By using the Municipality's website, you consent to the contents of the Policy in force at that time, and your continued access to or use of the website after any changes are made is deemed agreement to those changes.

### **Contact Us**

If you have any questions or comments respecting the Municipality's Privacy Policies, or for additional information about the administration of the *Access to Information Act* or *Protection of Privacy Act*, please contact the Municipality's Privacy Officer, whose contact details are:

Name: Wendy Wildman  
Phone: (780)967-0271  
Email: wendy@wildwillowenterprises.com

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