PROTECTION OF PRIVACY

This document is the parent policy for any College procedures. Questions regarding this policy are to be directed to the identified Policy Owner.

Category:	B. Administration
Policy Number:	B15
Approval Date:	May 21, 2026
Effective Date:	May 21, 2026
Policy Owner:	Chief of Staff Access & Privacy Coordinator

Objective:

This policy governs the development, implementation and review of Olds College of Agriculture & Technology (the "College") legislative obligations under the *Protection of Privacy Act (POPA)* for all personal information in its custody and control. The College is legislatively required to adhere to POPA and all employees (as defined in the Act) of the College community must comply with the College's responsibilities under the Act.

This policy applies to all personal information collected, used or disclosed by the College to fulfill its purpose to support the purposes of POPA. Thus, the College will:

1. Control the collection, use and disclosure of personal information in its custody and control;
2. Allow individuals a right to request corrections to personal information about themselves. This right does not extend to the correction of an opinion, including that of a professional expert;
3. Control the creation, use and disclosure of data derived from personal information and non-personal data;
4. Make reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction of personal information.

Policy:

1.	**Accountability**	
	1.1	Responsibility for ensuring compliance with the Act rests with the President & CEO.
	1.2	The President & CEO may delegate responsibility for managing activities relating to the collection, accuracy, protection, use, disclosure and retention of Personal Information. This delegation will be detailed in the Delegation of Authority, attached as an Appendix to this policy.

		1.2.1	This authority will be delegated to an Access & Privacy Coordinator to: a) Coordinate the development and implementation of policies and procedures to manage the College's compliance with the Act; b) Provide support services to College officials on matters pertaining to the protection of Personal Information.
2.	**Collection of Personal Information**		
	2.1	The College will collect Personal Information only for the following purposes: a) The information relates directly to, and is necessary for, an operating program or activity of the College; b) The Collection of Information is expressly authorized by an enactment of Alberta or Canada; or c) The information is collected for the purposes of law enforcement.	
	2.2	The College will collect Personal Information directly from the individual the information is about unless there is a reasonable requirement to collect from another source and the indirect Collection is permitted under POPA.	
	2.3	Details relating to the purpose(s) for the Collection of Personal Information will be provided to the individual when the Personal Information is collected directly from the individual.	
3.	**Use of Personal Information**		
	3.1	Personal Information collected by the College will be captured in the Directory of Personal Information Bank which will be publicly posted on the website.	
		3.1.1	Departmental data stewards are responsible to ensure that the Personal Information Bank articulating personal information under their custody and control is updated on at least an annual basis.
	3.2	Personal Information will not be used for a purpose other than the purpose for which it was collected or for a use consistent with that purpose except with the Consent of the individual or as permitted under POPA.	
4.	**Disclosure of Personal Information**		
	4.1	Personal Information will only be made public or disclosed to a Third Party under the following circumstances: a) The Disclosure is for the purpose identified at the time of collection or for a purpose consistent with the original purpose; b) The individual the Personal Information is about has consented to the Disclosure; c) The Disclosure is not considered to be an unreasonable invasion of privacy; or d) The Disclosure is required, permitted or authorized under POPA.	

	4.2	It is not considered to be an unreasonable invasion of a student's privacy to release the following information to a Third Party: a) Dates of registration at the College; b) Program of registration at the College; c) certificate(s), diploma(s) or degree(s) awarded from the College; d) Convocation dates; e) Attendance at, or participation in, a public event or activity related to the institution (e.g., convocation sporting or cultural events); or f) Personal Information already in the public domain.
	4.3	It is not considered to be an unreasonable invasion of an employee's privacy to release the following information to a Third Party: a) Employment status; b) Business address, telephone number, e-mail actress; c) Job title; d) Job profile; e) Rank, job department; f) Salary range; g) Discretionary benefits; h) Relevant educational qualifications; i) Attendance at or participation in a public event or activity related to the institution (e.g., sporting or cultural event); or j) Personal Information already in the public domain.
	4.4	Teaching materials and research information of employees may be disclosed to College Officials for administrative purposes.
5.	**Accuracy**	
	5.1	The College will take reasonable steps to ensure that Personal Information in its custody or under its control is as accurate and complete as is necessary for the purposes for which it is to be used.
	5.2	Individuals will normally be able to correct or update certain categories of Personal Information, such as contact information, on their own. To request a correction of other types of Personal Information, individuals may contact the departmental data steward.
	5.3	If the departmental data steward is unable to make the correction for any reason, the individual may file a request, in writing, for correction with the Access & Privacy Coordinator.
	5.4	If the College is satisfied that the individual's request for correction is reasonable, the correction will be made as soon as possible.
	5.5	The College will also send the corrected Personal Information to any organization to which it was disclosed during the year before the correction was made if the information could have been used to make a decision about the individual.
6.	**Retention**	
	6.1	The College will retain Personal Information only as long as necessary for the fulfillment of its purposes as defined in its retention rules.

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OF AGRICULTURE & TECHNOLOGY

7.	**Security**	
	7.1	The College will take reasonable steps to protect information from unauthorized access, collection, use, disclosure or destruction.
	7.2	When the College retains an external organization to undertake work on its behalf that involves the disclosure of Personal Information, the College will enter into an information sharing agreement with that organization. The information sharing agreement will set out conditions that ensure that the College's responsibility for the protection of Personal Information will be fulfilled by the external organization on its behalf.
8.	**Privacy Impact Assessments**	
	8.1	A Privacy Impact Assessment must be completed prior to implementing 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 if: a) The loss of, unauthorized access to or unauthorized disclosure of the personal information could result in significant harm; b) The practice, program, project or service will collect, use or disclose highly sensitive personal information; c) Any other circumstance identified in Section 5 of the *Protection of Privacy Regulations*.
9.	**Access**	
	9.1	Access to Personal Information in the custody and control of the College shall be managed as stipulated in Policy B04 Access to Information.
10.	**Questions / Complaints**	
	10.1	The Access & Privacy Coordinator will respond to questions or concerts about the College's management of treatment of personal information.
11.	**Questions / Complaints**	
	11.1	Violators of this policy may be subject to penalties under the College regulations, collective agreements and under provincial and federal law.

Definitions:

Collection:
means the act of gathering, acquiring, recording, or obtaining Personal Information from any source and by any means.

Consent:
means a voluntary agreement to a Collection, use and/or Disclosure of Personal Information for defined purposes.

Data Derived from Personal Information:
means data created by data matching and that identifies any individual whose personal information was used in the data matching.

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Data Matching:
means linking personal information between two or more databases or other electronic sources of information

Departmental Data Steward:
are managers (or designate) within a department responsible for ensuring legislative compliance with the *Access to Information Act* and the *Protection of Privacy Act.*

Disclosure:
means making Personal Information available to a Third Party.

Employee:
includes a person who performs a service for the public body as an appointee, volunteer or student or under a contract or agency relationship with the public body.

Formal Access Request:
refers to a request for access to information which cannot be answered through existing or established processes. A Formal Access Request is processed under terms and conditions set out in the *Access to Information Act* (ATIA).

Highly Sensitive Personal Information
means biometric information about an individual, financial information about an individual, personal information respecting a minor, senior or vulnerable individual

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

Personal Information:
means information about an identifiable individual including, but not limited to:'

- Name, home or business address, home or business telephone number home or business email address, or other contact information*
- Race, national or ethnic origin, color or religious or political beliefs or associations
- Age, gender, identity, sex, sexual orientation, marital status or family status
- An identifying number, symbol or other particular assigned to an individual
- Fingerprints, other biometric information, blood type, genetic information or inheritable characteristics
- Health and health care history, including information about physical or mental health
- Educational, financial, employment or criminal history
- Anyone else's opinion about the individual
- An individual's personal views or opinions, except if they are about someone else

*NOTE: Business contact information is a type of personal information that is routinely disclosed in a business or professional context. The disclosure of business contact information, in and of itself, is not usually an unreasonable invasion of privacy

Personal Information Bank:
means a publicly-accessible directory of personal information in the custody and control of the College. This list of personal information banks for the College lists: the name and location of the information bank; the type of personal information it contains; why the information was collected and how it is used or disclosed; and the legal authority for the collection of the information. A personal information bank does not provide direct access to an individual's records.

Privacy Breach:
means a loss of, unauthorized access to or unauthorized disclosure of personal information.

Privacy Impact Assessment:
means an assessment required under Section 26 of the *Protection of Privacy Act.*

Reasonable Security Arrangements:
means administrative safeguards, physical safeguards and technical safeguards to protect

	personal information, data derived from personal information and non-personal data in the custody and control of Olds College
	Record: means any electronic record or other record in any form in which the information is contained or stored, including information in any written, graphic, electronic, digital, photographic, audio or other medium, but does not include any software or other mechanism used to store or produce the record.
	Request for Correction: means a request by an individual to correct personal information which was recorded incorrectly by the College.
	Routine Disclosure: means allowing access to records that do not contain personal information outside of a formal Access to Information Request.
	Third Party: means a person, group of persons or an organization other than the individual the information is about. An employee or Board member of the College, acting in their official capacity, is not considered a third party.
Related Information: * link to access to legislation	*Protection of Privacy Act* *Protection of Privacy (Ministerial) Regulation* *Protection of Privacy Regulation* B09 Records Management & Disposition Policy C04 IT Governance & Technology Management Policy
Related Procedures:	B09 Records Management & Disposition Procedure B15 Protection of Privacy Procedure B15 Breach of Privacy Reporting Procedure B15 Privacy Impact Assessment Procedure B15 Personal Information Banks Procedure C04 Institutional Data Governance Procedure
Supporting Documents:	Collection Notification Privacy Breach Reporting Form Privacy Impact Assessment Template Directory of Personal Information Banks Privacy Management Program
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