

PROTECTION OF PRIVACY

This procedure is governed by its parent policy. Questions regarding this procedure are to be directed to the identified Procedure Owner.

Category:	B. Administration
Parent Policy:	B15
Approval Date:	May 15, 2026
Effective Date:	May 15, 2026
Procedure Owner:	Chief of Staff Access & Privacy Coordinator

Overview:	<p>Olds College of Agriculture & Technology (the “College”) has an obligation to collect, use, and disclose personal information for purposes that facilitate achieving its mandate and complying with law. The College also has an obligation to protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.</p> <p>This procedure outlines the actions and expectations of members of the College community regarding protection of privacy as defined by the <i>Access to Information Act</i> (ATIA) and the <i>Protection of Privacy Act</i> (POPA) (the “Acts”).</p>
Procedures:	<p>Each department in the College is to manage operations in a manner that fulfills the following:</p> <p>Collection of Personal Information Collection of personal information will only occur where:</p> <ol style="list-style-type: none"> 1. the collection is expressly authorized by an enactment of Alberta or Canada; 2. the information is collected for the purposes of law enforcement; or 3. the information relates directly to and is necessary for an operating program or activity of the College. <p>Documents used to collect personal information directly from an individual must contain a Personal Information Collection Notification Statement, using the template provided, that includes the following information:</p> <ol style="list-style-type: none"> 1. The purpose for which the information is collected; 2. The specific legal authority for the collection; and 3. The title, business address and business telephone of the Access & Privacy Coordinator, as delegated by the head of the College, who can answer the individual’s questions about the collection. <p>All notification statements are to be approved by the Access & Privacy Coordinator prior to use.</p> <p>For all new collections of personal information, the Access & Privacy Coordinator can assist in drafting the notification statement.</p>

When collecting personal information, every reasonable effort must be made to ensure that personal information is collected directly from the individual, and is accurate and complete.

An individual who believes that there is an error or omission in their personal information may request the College to correct the information. This may be done by:

1. providing evidence of the error and outlining the correction required by submitting a completed Request to Correct Personal Information Form; or
2. requesting a correction to an opinion is to be made by way of an annotation or by linking the correction to that part of the record that is relevant.

The department head, who is responsible for the record and the department that collected the personal information, will take action to correct any error and respond in writing, within 30 business days of the request for correction, to the individual indicating that either:

1. the correction has been made; or
2. an annotation or linkage has been made.

Use of Personal Information

Personal information will only be used:

1. for the purpose for which it was collected, or for a use consistent with that purpose; or
2. where the individual the information is about has identified the information and consented in writing to the specified use.

The College will only use personal information to the extent necessary to enable the College to carry out its purpose in a reasonable manner.

Personal information of an individual that is used to make a decision that directly affects that individual will be retained for at least one year after using it.

Disclosure of Personal Information

Personal information will only be disclosed:

1. For the purpose for which the information was collected or compiled;
2. For a use consistent with the purpose for which the information was collected or compiled;
3. To the alumni association for the purpose of its own fund-raising activities;
4. Only to the extent necessary to enable the College to carry out its purpose in a reasonable manner;
5. If the individual the information is about has identified the information and consented, in the prescribed manner, to the use;
6. to comply with an enactment of Alberta or Canada that authorizes or requires the disclosure;
7. for the purpose of complying with a court order having jurisdiction in Alberta; or
8. For a purpose not listed above for which that information may be disclosed under sections 13-15 of POPA.

Confidentiality

Employees who are collecting personal information or who have been provided access to personal information that has been collected will ensure that the personal information is kept confidential and may only disclose that personal information to other employees of the College who require the information in order to perform the duties of the position to which they were hired.

The personal information that can be shared is limited only to that component of

the personal information that is necessary for performing the job duties.

Consent

Informed and meaningful consent by an individual to use or disclose personal information that was collected for a purpose other than for which it was collected must specify:

1. to whom the personal information may be disclosed;
2. how the personal information may be used; and
3. be signed by the person who is giving consent.

The College requires consent in writing. However, in certain exceptional circumstances, consent may be received orally or electronically.

When consent to use or disclose personal information is sought by the College, it will accept informed consent in an electronic form as long as it meets the following prerequisites:

1. a record of consent will be retained as per the Olds College Retention and Disposition Schedule;
2. it will be made accessible for future reference and use;
3. it includes a reliable electronic signature that authentically identifies the user; and
4. it meets Sections 2-6 of the *Protection of Privacy Regulation*.

When consent to use or disclose personal information is sought by the College, it will accept informed consent in an oral form as long as it meets the following prerequisites:

1. a record of the consent will be created;
2. it will be retained as per the Olds College Retention and Disposition Schedule;
3. it will be made accessible for future reference and use;
4. it will reliably authenticate the identity of the user; and
5. it meets Section 7(6) of the FOIP Regulation.

Records Management

All records are to be managed in accordance with the Olds College Records Retention and Disposition Schedule, Records Management Policy and Records Management Procedures.

Personal Information Security

Physical Records

Personal information collected and/or used by departments must be stored in locations that provide reasonable safeguards against unauthorized access.

Electronic Records

Personal information access and use is subject to procedures established by the College that limit access to records to only those individuals that require access in order to perform their jobs.

Privacy Breaches

A privacy breach occurs when there is a contravention of the Protection of Privacy Act through an unauthorized access to or collection, use or disclosure or disposal of personal information.

It is College procedure to report any and all breaches to assess risk and mitigate impact to the affected individuals and the institution. Therefore, call the Access and Privacy Coordinator immediately if you suspect that a privacy breach has occurred.

Definitions:

<p>Collection: means the act of gathering, acquiring, recording, or obtaining Personal Information from any source and by any means</p>
<p>Consent: means a voluntary agreement to a Collection, use and/or Disclosure of Personal Information for defined purposes.</p>
<p>Consistent Purpose: means a purpose that has a direct and reasonable connection to the original purpose.</p>
<p>Disclosure: means making Personal Information available to a Third Party.</p>
<p>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</p>
<p>Personal Information: means information about an identifiable individual including, but not limited to:</p> <ul style="list-style-type: none"> • 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 <p>*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</p>
<p>Privacy Breach: means a loss of, unauthorized access to or unauthorized disclosure of personal information.</p>
<p>Request for Correction: means a request by an individual to correct personal information which was recorded incorrectly by the College.</p>
<p>Third Party: means a person, group of persons, or an organization other than the individual the information is about. An employee of the College, acting in their official capacity, is not considered a third party.</p>

Related Information:
[* link to access to legislation](#)

Review Period:

Revision History:

Access to Information Act
Access to Information Act Regulation
Access to Information Act: Designation of Public Bodies Regulation
Protection of Privacy Act
Protection of Privacy Act (Ministerial) Regulation
Protection of Privacy Act Regulation
Post-Secondary Learning Act

3 years

New: November 1998
Revised: February 2013
Revised: May 2020
Revised: February 2024
Revised: April 2026