



Policy# GOV 001-26

Privacy Policy

Date Approved: February 18th, 2026

Resolution No.: 2026/062

Last Review Date: March 2nd, 2022

Next Review Date: March 2028

Administrative Responsibility: CAO

Supersedes: GOV-76

Purpose

To establish the management of Town records that ensure public transparency while having the highest standard of personal data protection.

Policy Statement

The Town of Bruderheim is committed to protecting the personal information of its residents, taxpayers and customers. The Town will ensure that privacy protection is a core consideration in the design and implementation of all Town programs and services.

The collection, use and disclosure of personal information may only be undertaken within the parameters of the Protection of Privacy Act (POPA).

The Town of Bruderheim will ensure that appropriate measures are in place to govern these actions, while maintaining the public's right to access records as guaranteed by the Access to Information Act (ATIA).

Definitions

1. "Access to Information Act (ATIA)" means the legislation governing the right of the public to access records in the custody or under the control of the Town.
2. "Collection" means the gathering, acquisition, receiving, or obtaining of personal information. Collection may be in writing, audio or video recording, electronic data entry, or other such means under POPA.

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3. "Disclosure" means to release, transmit, reveal, expose, show, provide copies of, or tell the contents of information by any means to someone as regulated by POPA.
4. "Municipal Government Act" means the Municipal Government Act, R.S.A 2000, M-26, as amended.
5. "Personal Information" means any recorded information about an identifiable individual. This includes but not limited to names, home addresses, phone numbers, financial history and any identifying numbers.
6. "Privacy Impact Assessment (PIA)" means a formal process used to evaluate the effects of a proposed project, system, or program on an individual's privacy inherent to any service delivery channel including in-person, mail, telephone, and electronic services or administrative programs. It identifies potential risks and outlines strategies to mitigate them.
7. "Privacy Management Program" means under POPA as a program established and implemented by public bodies to control the collection, use and disclosure of personal information. The Town's PMP must include policies and procedures addressing access requests including a designated privacy officer, internal policies and procedures, training for employees and security classification systems.
8. "Protection of Privacy Act (POPA)" means the legislation governing the collection, use, and disclosure of personal information by the Town.
9. "Record" means any information created or received by the Town during its operations, regardless of physical form.
10. "Redaction" means the process of removing or blacking out sensitive or personal information from a record before it is released to the public under an ATIA request.
11. "Town" means Town of Bruderheim.

Authority to collect

The Town collects personal information under the authority of the Municipal Government Act and in compliance with ATIA and POPA. The Town will only collect information that is directly related to and necessary for an operating program or activity of the Town.

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Privacy Management Program (PMP) & PIAs

The Town will ensure the highest level of data protection by maintaining a proactive Privacy Management Program(PMP). Under POPA, the Town of Bruderheim must develop and maintain Privacy Impact Assessments for any new initiative or substantial change to existing programs involving the collection or use of personal information to comply with privacy requirements including automated systems and innovative technology.

1. PMP Administration: The Chief Administrative Officer is designated as the Privacy Officer responsible for the PMP. This includes overseeing internal policies and procedures, a security classification system, ensuring mandatory privacy training for all employees and establishing a schedule for periodic review and assessment of the Town's privacy practices.
2. Public access: As required by law, the Town will make the PMP available to any individual upon request. Administration will provide a copy of the program and how to access it within 30 business days of receiving a written inquiry and payment.

Use and Disclosure

The Town will collect information solely for the purpose for which it was collected. Under ATIA:

1. Transparency: The public has the right to access Town records, but personal Information is strictly protected and redacted before any files are released.
2. Disclosure: The Town will not disclose any personal information to third parties without written consent unless authorized by law.

When collecting information directly, the Town must provide a notice stating the legal authority (POPA), the purpose, and contact information for a Privacy Officer.

Automated Systems

In accordance with POPA, the Town specific transparency regarding automated technology:

1. Notification: If the Town collects personal information with the intent to input it into an automated system to generate content or make decisions, recommendations or predictions about an individual it will be stated in the collection notice.
2. Human Oversight: The Town is committed to maintaining human accountability for any outputs or decisions generated by automated systems to ensure fairness and ethical use.

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Prohibition on Sale of Information

The Town of Bruderheim is strictly prohibited under POPA from selling personal information in any circumstances or for any purpose including marketing or advertising. The Town will not exchange data for financial gain or commercial benefit.

Mandatory Breach Notification

In compliance with POPA, if a privacy breach occurs that poses a “real risk of significant harm” to individuals, the Town will notify the affected persons and the relevant Privacy Commissioner without unreasonable delay.

Forms Management

POPA recognizes that forms are a primary method of collecting personal information. It is mandatory to bring all forms into compliance with the privacy protection provisions of POPA. A thorough review of all forms is required to ensure they meet modern privacy standards and that unnecessary data elements are eliminated.

Security Safeguards

The Town will ensure safeguards are proportional to the sensitivity of the data.

Under ATIA and POPA, the Town is committed to a Privacy by Design approach, ensuring that all personal information is collected only when strictly necessary and protected by administrative, physical and technical safeguards.

The Town will maintain a classification system that limits data access on a need-to-know basis.

Roles and Responsibilities

1. The Chief Administrative Officer is responsible for ensuring that accountability for privacy issues is clearly incorporated into the duties of all Town Employees, volunteers, contractors and any other participants including those from other institutions, jurisdictions and sectors.
2. The Chief Administrative Officer is responsible for providing advice to Department Directors, Town Employees and Council and must develop and implement procedures to assist departments in respect of forms management programs.
3. The Chief Administrative Officer is responsible for liaising with the Office of the Information and Privacy Commissioner (OIPC) on privacy breaches, privacy complaints and access appeals.

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Access to information fees (ATIA)

General Town records are subject to the following under the ATIA Regulation:

1. Collected as set out in the Fees and Charges Bylaw Schedule "A" for the Town of Bruderheim.

Dated this 18th day of February 2026.

Original Signed

Dennis Tomuschat
Interim Chief Administrative Officer
THE TOWN OF BRUDERHEIM

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