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| Policy | Privacy Policy | Policy No. | 63 |
| Effective Date | June 15, 2019 | Approved by | Council |
| Date Amended | December 3, 2024 | Resolution No. | 163/24 |
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PURPOSE

Establish the authority and responsibility for the Village of Anmore to ensure privacy and confidentiality in the collection, management, disclosure, and retention of personal information to comply with the requirements of the Freedom of Information and Protection of Privacy Act.

DEFINITIONS

“Control” means the authority to manage a record throughout its life cycle;

“Corporate Officer” means the person assigned the responsibility of corporate administration as appointed under the Community Charter.

“Custody” means having physical possession of a record, including responsibility for access, managing, maintaining, preserving, disposing, and providing security;

“Freedom of Information and Protection of Privacy Act (FOIPPA)” means legislation that governs the Village’s behavior in collecting, using, and disclosing personal information.

“Personal Information” means recorded information about an identifiable individual, including an individual's name, address or telephone number; race, national or ethnic origin, colour, or religious or political beliefs or associations; age, sex, sexual orientation, marital status or family status; an identifying number, symbol or other particular assigned to the individual; fingerprints, blood type or inheritable characteristics; health care history, including a physical or mental disability; financial, criminal or employment history; anyone else's opinions about the individual, and the individual's personal views or opinions, except if they are about someone else.

“Privacy Impact Assessment” means a review of a new program, policy, initiative, or information system to identify and minimize the privacy risks.

“Records Management” means the systematic control of the creation, receipt, maintenance, use and disposition of Village records in the conduct of the operational and administrative functions and activities of the Village.

“Village” means the Village of Anmore

SCOPE

This policy applies to all Village employees, contractors, and any volunteer or service provider collecting, using, disclosing or retaining personal information on behalf of the Village.

POLICY

1. In accordance with FOIPPA, the Village will collect personal information only for the purposes necessary for a program, activity, or service.
2. In accordance with FOIPPA, the Village will use personal information only for the purpose it was collected, purpose to which the individual has provided consent, or a purpose that has a reasonable and direct connection to its original collection
3. The Village will disclose personal information in its custody or under its control only as permitted under FOIPPA or another enactment.
4. Records created or received in the context of Village functions are the property of the Village and not the employee, contractor, or service provider who captures them unless otherwise designated.
5. Personal information transmitted to any third party will be transmitted over secured connections.
6. Privacy Impact Assessments are completed by staff members responsible for all new Village programs, policies, initiatives, systems, projects, or activities, as deemed appropriate by the Corporate Officer.
7. Sensitive and personal information should only be accessed by employees and contractors who are required to access the data to perform assigned duties.

8. Training will be provided to all employees on their responsibilities when handling personal information.
9. Personal information is stored in a secure manner to prevent unauthorized disclosure which includes:
 - Physically securing offices where personal information is kept;
 - The use of user IDs, passwords, encryption, and firewalls for computers; and
 - Restricting employee access to personal information as appropriate to the circumstances
10. The Village will retain personal information only as long as necessary to fulfill the identified purposes, statutory or legal requirement, or business purposes and will manage disposition of personal information in accordance with the Village's records management program.
11. Data breaches are reported to the Corporate Officer as soon as reasonable and the Corporate Officer will review and resolve unauthorized disclosure or privacy breaches in accordance with the privacy breach procedure and best practices as prescribed by the Office of the Information and Privacy Commissioner for British Columbia. Third party service providers are required to inform the Village of any data breaches involving Village information.
12. In accordance with FOIPPA, the Village will make every effort to ensure that personal information that is in the custody or under the control of the Village is accurate. A person who believes there is an error or omission in personal information may request a correction by contacting the Village.
13. A Personal Information Bank, which is a record of the types and sensitivities of personal information being held by each department, will be maintained by the Corporate Officer. This enables the Village to ensure all personal information in its custody and/or control is properly secured and protected from inappropriate use or disclosure.
14. An information sharing agreement will be used when there is a regular and systematic exchange of personal information between the Village and any other public sector organization or external agency, using the BC Information Sharing Code of Practice.
15. A privacy complaint is a complaint from an individual about a breach of their own personal information. Privacy complaints that are received by the Village will be referred to the

Corporate Officer who will investigate the complaint in accordance with established privacy breach protocol in section 11.

16. Department managers will ensure that service providers, contractors, and consultants are aware of their obligations under this policy.
17. The Corporate Officer will review the privacy policy at least every four years to ensure it remains appropriate to the Village's activities and is compliant with FOIPPA.