

In this policy,

ATIA: means the Access to Information Act.

CAO: means the Chief Administrative Officer (CAO) as appointed by Council, or the Chief Administrative Officer's designated individual.

Council: means the individuals elected to sit as Town Council under the Election Act and the Municipal Government Act of Alberta.

Employee: means an individual employed by the Town, directly, or by means of a contract.

High sensitivity information: has the same meaning as in section 1 of the Protection of Privacy (Ministerial) Regulation, AR 143/2025.

Lower sensitivity information: means information other than high sensitivity information.

Personal information: has the same meaning as in the Protection of Privacy Act.

POPA: means the Protection of Privacy Act.

Public: means any person or group other than Council members or employees, including residents, visitors, businesses, and organizations.

Record: has the same meaning as in the Access to Information Act.

Safeguards: means the administrative, physical, and technical measures/controls as required under the Protection of Privacy Act.

SOP: means Standard Operating Procedure, a procedure approved by the CAO to be followed by all employees in relation to a defined activity/task.

Town: means the Town of Calmar.

Policy:

1. Scope and Application

This Policy applies to all activities, tasks, or procedures when the Town of Calmar acquires, creates, stores, and/or manages records, as well as when it receives requests for correction of personal information or request for access to information. The town must adhere to both ATIA and POPA.

2. Designation of Privacy Officer

The CAO is hereby designated as the Privacy Officer for the Town of Calmar.

3. Town of Calmar Bylaws, Policies, and SOP's

The Town of Calmar's Privacy Management Program is supported by a combination of bylaws, policies, and Standard Operating Procedures (SOP's) that collectively govern the collection, use, disclosure, safeguarding, and management of personal information, non-personal data, and records under the Town's control.

Policies are approved by Council or the CAO, as appropriate, and establish governance, authority, and accountability. SOPs are approved by the CAO and provide operational procedures that employees and service providers must follow in the performance of their duties.

The Town of Calmar has the following related Bylaw, Policies and SOP's.

Bylaw	Approved
2023-22 Records and Information Management Bylaw	December 11, 2023
2026-02 Designated Officer	February 02, 2026
Policies	
2026-123 Non-Personal Data	June 1, 2026
2026-124 Privacy Incident	June 1, 2026
SOP's	
Access to and correction of information	June 9, 2026
Automated system	June 9, 2026
Mobile Device Management	June 9, 2026
Privacy complaints	June 9, 2026

4. Privacy Management Program Structure

The Town's Privacy Management Program is structured to ensure privacy protection is embedded into daily operations and decision-making. The program includes:

- Governance instruments, including policies and bylaws, that establish authority and accountability;
- Standard Operating Procedures that provide step-by-step direction for staff and service providers;
- Training and awareness to ensure employees understand their responsibilities; and
- Ongoing review and oversight to assess effectiveness and address emerging risks.

This layered approach supports consistent compliance with the Protection of Privacy Act and enables the Town to demonstrate accountability to the public and the Office of the Information and Privacy Commissioner.

Auditing, reporting, and escalation

To evaluate the effectiveness of the program, the Privacy Officer will track the percentage of employees who have been trained annually, the number of complaints received, and incidents

that have occurred. Other metrics may be developed over time to measure the performance of the PMP.

Reporting and escalating requests, issues, concerns, and/or incidents is also key in ensuring that the PMP meets the objective it is designed to meet. Tracking the time between when a situation occurs and when it is reported/escalated to the Privacy Officer is also an important measurement that can speak to the effectiveness of the PMP.

5. Personal Information Inventory

Throughout its organization and its various processes, the Town of Calmar obtains, creates, stores, and manages records. The Town has under its care and control a high volume of personal information. These would be financial information about individuals as well as personal information respecting minor, senior, or vulnerable individuals, and employment information for Town staff. This information constitutes records used for and/or related to the various services the town offers.

Appendix A, being part of this policy, contains the Personal Information Inventory (PII). It is structured by department. The PII should be updated:

- When this policy or any of the related bylaws, policies, and SOP's are being updated,
- When the Town of Calmar implements a new service/program or alters significantly an existing one,
- With technological change/advancement, including digitalization of records, and
- Should there be any changes in legislation.

6. Privacy Impact Assessments

Privacy Impact Assessments (PIAs) will be conducted in accordance with the requirements of the Protection of Privacy Act and Protection of Privacy (Ministerial) Regulation.

A PIA will be submitted to the Office of the Information and Privacy Commissioner (OIPC) if:

- a practice, program, project or service will collect, use or disclose personal information deemed to be of high sensitivity;
- a practice, program, project or service will involve the personal information of a significant percentage of the population the Town serves;
- a practice, program, project or service will involve data matching between 2 or more public bodies;
- a practice, program, project or service is part of a common or integrated program or service;
- a practice, program, project or service involves the development or use of innovative technology;
- the Commissioner requests a copy of a privacy impact assessment.

The Town may use the OIPC's PIA submission assessment tool to determine if the threshold is met to submit a PIA to the OIPC.

7. Security classification system

The Town of Calmar has various records under its care and control which contain personal information, data derived from personal information, and non-personal data. The Town must make reasonable efforts to protect these records against unauthorized access and ensure the appropriate level of management regarding the collection, use, storage, disclosure, or destruction of these records.

To manage these records, the town has established a classification system rooted in a tiered system. Each tier has its own level of security and will have specific safeguards. The tiers are:

- Tier 4: Non-Personal Data (NPD)
- Tier 3: Data Derived from Personal Information (DDFPI)
- Tier 2: Personal Data (PD)
- Tier 1: High Sensitivity Personal Information (HSPI)

The matrix contained in schedule B explains how to deal with each Tier. Employees will have to follow the matrix and in case of ambiguity or uncertainty about the tier for a specific record or the appropriate actions to take, employees are to consult the Privacy Officer before taking any actions.

8. Safeguards

The Town of Calmar is using a combination of administrative, physical, and technical safeguards to ensure the protection of the information within its care and control and to meet its obligations under POPA.

Administrative

Policies and SOP's have been developed to ensure compliance within the town's processes and daily operations. The policies and SOP's identified in this policy will have to be kept updated, and as they are reviewed, audited, and updated, new policies, SOP's and bylaws may become necessary.

Physical

The Town has under lock high sensitivity information in filing cabinets, within locked offices/spaces, as well as within two safes located at the Town's office. Access to these files is restricted based on the business unit that has care and control of these records. Only the CAO has access to every record. The Digital Records that are on site are protected in the restricted server room equipped with air conditioning to prevent overheating of the equipment.

To address the potential natural and environmental hazards, the Town will undertake the conversation of its physical records to digital records. This will minimize potential constraints such as fire, flooding, or unauthorized intrusion.

Technical

To protect the town's electronic information and to control its access, the Town of Calmar uses various tools. These include:

- Multifactor Authentication
- Microsoft Business Premium 365
- Endpoint Detect and Response Technology
- Next Generation Firewall
- Next Generation Antivirus + EDR
- Entra IDP1

In addition, user ID, passwords, and access controls are utilized to limit access to employees and even further restrict employees' access based on the business units. Furthermore, servers are encrypted.

9. Consents

The Town shall obtain consent from employees and members of the public in relation to the collection of personal information, where possible, and in accordance with the POPA. Where consent can be obtained in writing, the Town will make every effort to do so and maintain a record of such written consents having been obtained.

The Town may also gain consent for the collection of personal information orally or electronically, or by implication (for example, where signage is posted at a Town event indicating that photographs may be taken and attendance at the event constitutes consent).

10. Mandatory employee training

At a minimum, each employee must take the *Protection of Privacy Act for Public Bodies Course* offered by the Government of Alberta at least once per year. Should this course be discontinued, the Privacy Officer will identify alternative mandatory training.

Employees in positions that have care and control of highly sensitive personal information as identified in Appendix A will be required to take additional training by a recognized institution and subject to the approval of the Privacy Officer at a minimum of once every three years. Furthermore, ATIA/POPA training will be included in each employee's learning plan.

11. Periodic review and ad hoc review

This policy shall be reviewed no less than once every four years. The periodic review shall be supplemented by ad hoc review that can be triggered by:

- The review of any of the related bylaws, policies, and SOP's,
- When the Town of Calmar implements a new service/program or alters significantly an existing one,
- When the Town reviews the Personal Information Inventory,
- With technological change/advancement, including digitalization of records, or
- Should there be any changes in legislations.

12. Public transparency and access

This policy and associated documentation will be accessible directly at The town's office as well as on the Town's website.

Policy responsibilities:

The implementation of this policy will require the following:

Council responsibilities:

- a. Approve the policy and ensure that the related policies and bylaws are updated and reviewed at regular intervals as well as when needed.
- b. Approve the Town's annual budget and ensure that the CAO has the necessary financial, human, and technical resources to establish, implement, and periodically review, assess and update the PMP.
- c. Adhere to POPA by following the Town's policies, bylaws, and procedures in all their activities.

CAO responsibilities:

- a. Assume the role and responsibilities of the Privacy Officer under POPA.
- b. Delegate the role and responsibilities of the Privacy Officer to the Acting CAO when the CAO is unavailable and/or incapacitated to conduct its regular duties.
- c. Serve as the primary point of contact for privacy inquiries and concerns.
- d. Approve privacy-related SOPs, authorize the creation and use of non-personal data, and oversee the management of privacy incidents in accordance with approved policies and procedures.
- e. Support the creation, implementation, and maintenance of privacy policies and SOP's.
- f. Ensure the Town of Calmar adheres to POPA.
- g. Oversee the management of the PMP.
- h. Represent the Town of Calmar during investigations by the Office of the Information and Privacy Commissioner (OIPC).
- i. Ensure that all employees receive appropriate training and education about the PMP and the related policies and SOP's.

Employee responsibilities:

- a. Adhere to the policy and all related policies and SOP's.
- b. Report any challenges, issues, or potential opportunities to improve the PMP.

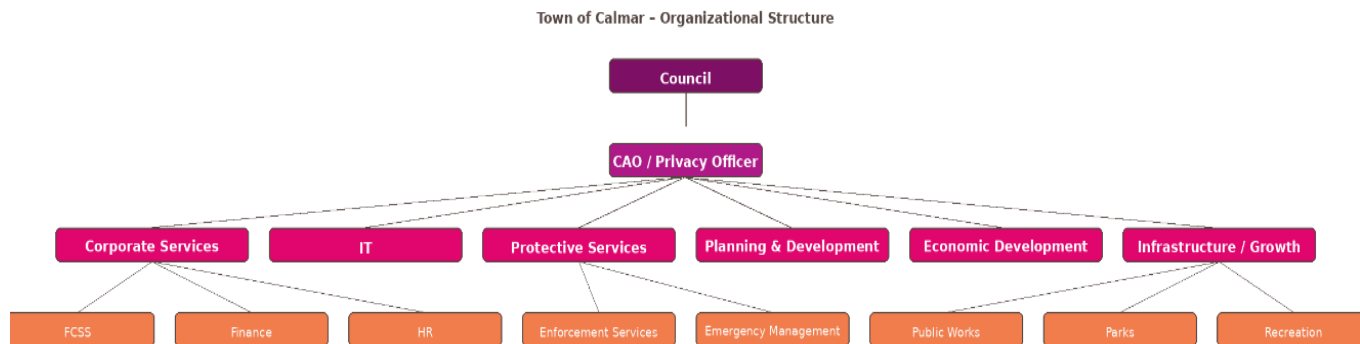
- c. Participate actively in the training and education sessions.
- d. Report privacy incident to the CAO.

Policy review:

This policy will be reviewed as per the provisions of Section 9.

Appendix A: Personal Information Inventory

The Town of Calmar operates under a simple hierarchy whereas the Chief Administrative Officer (CAO) is the sole employee of Council and is the designated Privacy Officer. All staff are ultimately under the leadership and responsibility of the CAO. All functions are performed by one of the six departments. Each department has between one (when the department is considered the business unit) and three business units. The diagram below shows the organizational structure of the Town.



As of 2026, the Town of Calmar is using both physical (PR) and digital (DR) records. Although the Town's intent is to move forward with the digitization of most if not all records, it is anticipated that the transition will take a few years. Furthermore, the current PR are located on premises owned by the Town of Calmar and the DR are located on Town servers located on premises with copies on remote servers in Calgary and Toronto for ease of operations and recovery should the Town ever be targeted by cybercrime. Moving forward, it is the intent of the Town to move its DR to the cloud but always remaining within Canadian space. Below is a breakdown by department.

Council

Operations: Council is responsible for the governance of the municipality under the Municipal Government Act (MGA). It adopts the policies and bylaws for the Town as well as the operational and capital budgets and plans. All documents approved by Council are located on the Town's servers and website. Council deals with limited personal information, mainly when they interact with residents by email or cellular.

Types: Council exchanges emails and phone conversations and they occasionally will receive and/or send a letter, but these are mainly to other organizations or agencies. Most of its interactions are verbal exchanges, which do not always translate into the creation of a record.

Volume: Annually, there are less than 150 users for this unit, and not each user as a record. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Emails – DR Letters – PR and DR

Location of information: PR received by Council is given to Administration to be filed in the proper department. DR information is in Council's Outlook, their personal cell phone, and their respective OneDrive.

CAO/Privacy Officer

Operations: The CAO/Privacy Officer is responsible for overseeing the operations of the municipality and ensuring compliance with POPA. The CAO is the head of the public body and the head of the IT, Protective Services, Planning and Development, and Economic Development departments. The Office of the CAO deals mainly with personal information of lower sensitivity such as emails, cell numbers, and addresses. On rare occasions, highly sensitive information will be utilized. This would be information linked to vulnerable people or financial information. Typically, this type of information will cross the Office of the CAO in the capacity of department head of another department.

Types: The CAO/Privacy Officer uses mainly emails, forms, surveys, and non-personal data (statistics) from external stakeholders or various departments.

Volume: Annually, the CAO/Privacy Officer will interact with less than 200 individuals, and not every individual interaction will lead to the creation of a record. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

emails – DR

Forms – PR and DR

Surveys – PR and DR

Non-personal data – PR and DR

Location of information: All PR information is within the CAO's office, and all the DR information is located on Town's server or the unit's OneDrive.

Corporate Services

Family Community Support Services (FCSS)

Operations: The FCSS Business Unit (FCSSBU) is responsible for providing information/support and connecting individuals to agencies that can provide resources and/or support in preventive measures. People that utilize these services are vulnerable and therefore, any information pertaining to these services is deemed highly sensitive. Furthermore, this unit deals with financial information associated with the community volunteer income tax program. This information is held within a locked cabinet during the program and shredded once the program is over.

Types: The unit uses waivers and signing sheets for activities, online registration, surveys, and non-personal data (statistics) from external stakeholders.

Volume: Annually, there are less than 150 users for this unit, and not each user as a record. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Waivers – PR and DR

Registration – DR

Signing sheet – PR

Surveys – PR and DR

Location of information: All PR information is locked in the unit's office, and all the DR information is located on Town's server or the unit's OneDrive.

Finance (HR)

Operations: The Finance Business Unit (FBU) is overseeing municipal accounting and financial operations. This unit also oversees the accounts receivable/payable, which include the utilities and taxation. Therefore, this unit deals with high sensitivity information as it deals with individual financial information regularly. As of May 2026, the town has 1,037 utility accounts, and the information is in a specialized software (Great Plains - GP). Furthermore, the Town has 1,232 tax rolls with the information contained in GP, the Town's server, and within the Town's filing room. While some records are contained within locked safes in the filling room, the tax roll files are located on a shelving system. It is the intent to digitalize these files in the near future. Lastly, this unit also has archived records located at the Public Work building in a locked storage and are managed as per the retention bylaw. The key to that storage has been entrusted to the Manager, Infrastructure and Growth.

Types: The unit uses forms, waivers, emails, letters, and fax to exchange information with individuals

Volume: Annually, there are a few thousand records managed by this unit. Although this is the unit that manages the most records for the Town of Calmar, it is still considered by the Town as a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Forms – PR and DR

Letters – PR

Waivers – PR and DR

Fax – PR and DR

Location of information: The PR information is in the unit's office, the filing room, and in the storage archived. The DR information for the unit is in the specialized software, the Town's server, and the unit's OneDrive.

Human Resources (HR)

Operations: The Human Resource Business Unit (HRBU) is an internal department assuming the responsibilities associated with the human resources of the organization. It also oversees remuneration and benefits for 25 active individuals as well as 64 inactive individuals (past employees and council members). This unit deals with financial information associated with past and present employees and council members. Therefore, the unit is managing high sensitivity information.

Types: The unit uses waivers, forms, and emails to interact with individuals.

Volume: Annually, there are 25 active users for this unit and occasionally, there might be interaction with a past employee/council member. Most interactions create a record. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Waivers – PR and DR

Forms – PR and DR

emails – DR

Location of information: All PR information is locked in the unit office and within a locked cabinet. The DR information is located on town's server or the unit's OneDrive.

IT

Operations: The Information Technology Business Unit (ITBU) is responsible for ensuring the IT environment operations, maintenance, and safeguard. This unit is different than the others since it relies on both internal and external resources that are reporting directly to the CAO. The unit does not generate a lot of records but works at safeguarding all the DR created by other units. As of May 2026, the total DR records combined constitute less than 1 TB of information. The DR are located on servers that are encrypted and employees must use multifactor authentication to gain access to the server every time that they want access from any device other than their official station (which is password protected on a rotational basis).

Types: The unit manages only DR located within the town's IT environment.

Volume: As of May 2026, the total DR for the Town of Calmar constitutes less than 1 TB of information. Considering that in today's era, many individuals have significantly more TB than the town, the Town of Calmar considers this a low volume of records.

Format:

Various – DR

Location of information: All the DR information is located on the Town's server or the unit's OneDrive. As of May 2026, DR are no longer permitted on personal devices, computers desktop, and the personal section of the Town's server. As PR are converted to DR, they will be located on the server and eventually into the cloud.

Protective Services

Enforcement Services (ES)

Operations: The Enforcement Services Business Unit (ESBU) is responsible for offering the Bylaw Officer and Community Peace Officer services to the community. This unit interacts with residents, visitors, and other agencies. The unit function includes education and awareness, community engagement, and enforcing Acts, Regulations, and Bylaws. Due to the nature of their work, the unit records are deemed confidential and restricted to the individual within the unit, unless otherwise permitted by law.

Types: The unit generates case files and issues tickets, warning, and compliance orders. The unit also generates a monthly statistic table, but these only contain the number of actions per category (example: call for service, traffic stops, warnings, tickets, etc.). These tables do not contain any personal information.

Volume: Annually, there are between 500 and 1,000 records created by this unit. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Tickets – PR and DR

Warning – PR

Compliance orders – PR

Location of information: All PR information is locked in the unit office, and all the DR information is located on the unit's specialized software. Additional DR are locked within the Town server and restricted to members of the unit.

Emergency Management (EM)

Operations: The Emergency Management Business Unit (EMBU) is responsible for planning, training, and executing the necessary operations related to emergency management. This unit does not typically deal with personal information, but in the situation of an actual emergency, could have to manage personal information should there be the need to erect an emergency shelter, distribute essential products/resources to the residents, or conduct an evacuation.

Types: The unit would use forms that are associated with the Emergency Management Plan in the event of an emergency.

Volume: The activities linked to this unit are extremely rare. The Town has no record of the Incident Command Center being activated in the last 30 years. Therefore, the Town of Calmar considers this a low volume of records.

Format:

Forms – PR and DR

Location of information: All PR information is in the unit office, and all the existing DR information is located on Town's server and website.

Planning and Development

Operations: The Planning and Development Business Unit (PDBU) is responsible for managing the development activities which is regulated by the MGA, the Town's Land Use Bylaw, and the National Building Codes – Alberta Edition. All disciplines included, the unit manages less than 200 records per year. For the building, electrical, plumbing, and gas permits, the Town uses the services of Superior Safety Codes Inc., a certified entity under the Safety Codes Act. This unit deals indirectly with financial information associated with application fees. Even though the financial information is handled by the Finance Business Unit, it happens on rare occasions that an applicant will provide financial information to this unit to pass along to Finance.

Types: The unit creates/receives application files, uses signing sheets in open houses, sends referrals, conduct surveys, prepares and receives non-personal data (statistics) from external stakeholders.

Volume: Annually, there are less than 200 users for this unit, and not each user has a record. The majority of the information managed is lower sensitivity. Furthermore, there is very little financial information received/managed by the unit. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Application files – PR and DR

Signing sheet – PR

Referrals - PR and DR

Surveys – PR and DR

Non-personal data (statistics) - DR

Location of information: All PR information is in the unit office, and all the DR information is located on Town's server or the unit's OneDrive.

Economic Development

Operations: The Economic Development Unit (EDBU) is responsible for the promotion and marketing of the Town of Calmar. Its activities are linked to the retention, expansion, and attraction of businesses. Other than in the case of homebased businesses, their records do not contain personal information, but may contain business information.

Types: The unit uses signing sheets for activities and surveys oriented to the business community and other governmental agencies.

Volume: Annually, there are about 120 external parties linked to this unit. Considering that most of the records are linked to businesses, there are very few personal records. Therefore, the Town of Calmar considers this a low volume of records.

Format:

Signing sheet – PR

Surveys – PR and DR

Location of information: All PR information is in the unit office, and all the DR information is located on Town's server or the unit's OneDrive.

Infrastructure and Growth

Parks

Operations: The Parks Business Unit (PBU) is responsible for the maintenance of the Town's recreational amenities. Their interaction with external parties is limited to mainly maintenance questions and/or issues, and most interactions are done verbally with a few emails from time to time. Personal information that may come across this unit would be the contact information (cell or email) of a person representing a user group or a resident desiring some maintenance on a park or reporting an issue.

Types: The unit uses mainly their cellular to communicate with external parties and send emails on rare occasions.

Volume: As most communication is done verbally and that interaction is mainly around maintenance and issues, it is estimated that there are less than 50 users annually for this unit. The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:
emails – DR

Location of information: All DR information is in the unit emails and on Town's server.

Public Works

Operations: The Public Works Business Unit (PWBU) is responsible for erecting, operating, maintaining/repairing, and expanding the municipal infrastructure network. Most of their records are about municipal assets and therefore do not contain any significant number of personal records. However, when the unit gets a service call, they would obtain the name, address, and contact information of the resident. This personal information is transitional since it is discarded once the maintenance/repair task has been done. Some of the personal records will be classified as high sensitivity information as they would pertain to clients that are classified as vulnerable people.

Types: The unit uses forms, waivers and emails to interact with external parties and other units. The unit also generates internal notes to help with the various service calls.

Volume: As most communication is done verbally and that interaction is mainly around maintenance and issues related to the Town assets, it is anticipated that the volume of users and records created may fluctuate significantly depending on the season (weather conditions) and the performance of the Town's infrastructure. On average, this could mean anywhere between zero and 5 services calls per day, and therefore, likely less than 2,000 users per year. However, many of the records created are temporary and they are destroyed once the maintenance/issue has been addressed. Therefore, the Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:
Forms - PR and DR Waivers - PR and DR
Emails – DR Notes - PR

Location of information: Most of PR information is in the unit offices except for the notes that are with the Manager, Infrastructure and Growth. The DR information is located on the Town's server or the unit's OneDrive.

Recreation

Operations: The Recreation Business Unit (RBU) is responsible for the Town's programming as well as the rental of recreational facilities. This unit does not collect, store, or utilize any biometric or financial information. However, the unit utilizes personal information for the

purpose of registration. People that register will provide their name and a minimum of one contact (email or phone number). Most of the registrations are done by adults, but because minors will register from time to time, it is considered that the unit deals with a very low volume of highly sensitive information.

Types: The unit uses waivers and signing sheets for activities, online registration and booking, surveys, and non-personal data (statistics) from external stakeholders.

Volume: Annually, there are between 500 to 1,000 records created with lower sensitive information, and less than 100 records of highly sensitive information (minor registering for programs). The Town of Calmar considers this a low volume of records in the context of the municipalities in Alberta's Capital region.

Format:

Waivers – PR and DR	Signing sheet – PR
Registration and booking – DR	Surveys - DR

Location of information: All PR information is held in the unit office, and all the DR information is located on the Town's server or the unit's OneDrive.

Appendix B Security Classification Levels

	Tier 4	Tier 3	Tier 2	Tier 1
Example of records	<ul style="list-style-type: none"> • Department Reports • Policies • Bylaws 	<ul style="list-style-type: none"> • Survey results • Growth reports • Statistics 	<ul style="list-style-type: none"> • Applications • Registrations • Permits • Licenses 	<ul style="list-style-type: none"> • Utility Accounts • TIP program • FCSS files
Access	Open and non-restricted	Open once validated by supervisor	Closed to the public unless redacted pursuant to the ATIA/limited within a business unit	Closed to the public / restricted within the business unit
Collection and use	Collected for broad purpose to inform or help make decision	Collected for broader purpose and can be Scheduled ahead Can inform level service or help make decision	For very specific Service and/or program	For very specific Service and/or program
Disclosure	Open to Administration and the public	Open to public Once the content has been validated and open to the Administration	Close to the public unless redacted and limited within business unit	Close to the public and restricted within the business unit
Destruction	Done by business unit as per record management bylaw	Done by business unit as per record management bylaw	Done by business unit as per record management bylaw and with approval of Department Director	Done by business unit as per record management bylaw and with approval of Department Director and Privacy Officer

* Classification

Tier 4: Non-Personal Data (NPD)

Tier 3: Data Derived from Personal Information (DDFPI)

Tier 2: Personal Data (PD)

Tier 1: High Sensitivity Personal Information (HSPI)