

**POLICY**

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**POLICY No. 2026-123**  
**TITLE: Non-Personal Data Policy**

**APPROVAL DATE: JUNE 1, 2026**

**DEPARTMENT: All Departments, Council, and  
CAO's Office**

**REVISION DATE:**

**MAYOR:** *K. Gardner*

**CAO:** *[Signature]*

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**Purpose:**

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The purpose of this policy is to establish governance and accountability for the creation, use, disclosure, and safeguarding of non-personal data by the Town of Calmar in accordance with the Protection of Privacy Act (POPA).

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**Policy Statement:**

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The Town of Calmar recognizes that non-personal data may support planning, evaluation, and service improvement while maintaining a strong commitment to privacy protection.

The Town permits the creation and use of non-personal data only where appropriate safeguards are in place to minimize the risk of re-identification and where such use is consistent with legislative requirements and approved governance controls.

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**Definitions:**

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In this policy,

**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.

**Non-personal data:** has the same meaning as in the Protection of Privacy Act.

**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.

**Town:** means the Town of Calmar.

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## Policy:

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### 1. Scope and Application

This policy applies to all departments, employees, contractors, and service providers involved in the creation, use, or management of non-personal data under the care or control of the Town of Calmar.

### 2. Governance and Accountability

The Chief Administrative Officer (CAO) is designated as the Privacy Officer and is responsible for oversight of non-personal data governance.

The creation or use of non-personal data must be approved by the CAO.

The CAO will ensure appropriate risk assessments or Privacy Impact Assessments are completed where required, but specifically where a program or service commences the creation or use of non-personal data.

Non-personal data may not be disclosed except in accordance with the Town's Privacy Management Program and the Access to Information Act.

The Town may use personal information or data derived from personal information already in its custody or control to create non-personal data.

Non-personal data must be created using generally accepted best practices and reasonable safeguards intended to prevent the identification or re-identification of individuals.

The Town shall maintain records respecting:

- a. the information used to create the non-personal data;
- b. the purpose for creating the data;
- c. the method used to create the data; and

- d. assessments conducted to reduce the risk of identification or re-identification.

### 3. Safeguards

The Town will apply administrative, physical, and technical safeguards proportionate to the risk of re-identification and the sensitivity of the source information.

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#### Policy responsibilities:

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##### Council responsibilities:

- a. Approve the policy and ensure that the related policies and bylaws are updated and reviewed at regular interval as well as when needed.
- b. 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 the policy.
- f. Ensure the Town of Calmar adheres to POPA.

##### 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 Policy.

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#### Policy review:

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This policy will be reviewed as deemed necessary but at a minimum once every four years. Furthermore, this policy shall be reviewed if the Privacy Management Plan Policy, the Privacy Incident Policy, or any other documents related to the protection of privacy framework adopted by the Town of Calmar, is amended.

