


POLICY

POLICY No. 2026-124
TITLE: Privacy Incident Policy

APPROVAL DATE: JUNE 1, 2026

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

REVISION DATE:

MAYOR: 

CAO: 

Purpose:

The purpose of this policy is to establish clear governance, authority, and accountability for the identification, management, notification, and reporting of privacy incidents involving personal information held by the Town of Calmar.

Policy Statement:

The Town of Calmar is committed to promptly identifying, containing, and responding to privacy incidents to protect individuals, maintain public trust, and comply with the Protection of Privacy Act (POPA).

Definitions:

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.

Personal information: has the meaning as set out 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.

Privacy Incident: has the same meaning as set out in section 10(2) of the Protection of Privacy Act.

Record: has the meaning set out in the Access to Information 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 privacy incidents involving personal information under the care or control of the Town of Calmar, including incidents involving employees, contractors, or service providers.

2. Governance and Accountability

The Chief Administrative Officer (CAO) is responsible for overall management of Privacy Incidents.

The CAO determines notification requirements, including notification to affected individuals and the Office of the Information and Privacy Commissioner where required.

3. Incident Management Framework

Privacy Incidents will be managed in accordance with approved SOPs addressing incident identification, containment, investigation, mitigation, and documentation.

4. Notification

Notification decisions will be based on assessed risk, including whether there is a real risk of significant harm, as required under POPA.

5. Review and oversight

Privacy Incidents will be reviewed to identify trends, training needs, and opportunities for improvement.

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. 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. Support the creation, implementation, and maintenance of privacy policies and SOP's.
- e. Ensure the Town of Calmar adheres to POPA.
- f. Represent the Town of Calmar during investigations by the Office of the Information and Privacy Commissioner (OIPC).

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.
- c. Participate actively in the training and education sessions.
- d. Report suspected or confirmed Privacy Incidents immediately in accordance with Town procedures to the CAO.

Policy review:

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 Non-Personal Data Policy, or any other documents related to the protection of privacy framework adopted by the Town of Calmar, is amended.

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