



Privacy Management Policy

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Purpose

Ponoka Jubilee Library (PJL) is governed by the Protection of Privacy Act (POPA) of Alberta and is committed to the privacy of personal information that is in the custody or control of the Library. The Ponoka Jubilee Library will only collect personal information if the information is necessary for employment records and purposes, an operating program, or activity of the library. Library employees and volunteers will not inappropriately disclose any private information gathered in the due course of their employment. The Ponoka Jubilee Library will make its Privacy Management Program available upon request.

Scope

This policy applies to all Ponoka Jubilee Library employees, volunteers, board members, contractors, and any agent providing service on behalf of the Library. This policy is applicable to all personal information in the custody or control of the Library, regardless of the medium or form.

Definitions

- **Custody** – Personal information that is in the possession of the Ponoka Jubilee Library.
- **Collection Notice** – A statement provided to individuals at the time of collecting personal information, explaining the purpose of collection, the legal authority for collection, and contact information for questions.
- **Consent** – Voluntary agreement by an individual for the collection, use, or disclosure of their personal information. Consent may be written, electronic, or verbal, provided it meets the requirements of the Protection of Privacy Act (POPA) and Library policy.
- **Control** – Personal information that the Ponoka Jubilee Library has the authority to manage, including restricting, regulating, and administering its use, disclosure, or disposition.
- **Formal Access Request** – A request for access to information or records that are not routinely disclosed and cannot be provided through existing procedures.
- **Informal Access Request** – A request for access to your own personal information or information of another person for whom you have proof of authority to act on their behalf.



- **Personal Information** – Any information about an identifiable individual, including but not limited to name, address, email, race, nationality, religious or political beliefs, age, sex, gender, marital status, identifying numbers (such as Driver’s License or Social Insurance Number), health information, employment history, financial information, photographs, and opinions from or about an individual.
- **Privacy Breach** – Any occurrence of unauthorized access to, collection, use, or disclosure of personal information. Unauthorized access includes:
 - a) Access by the public where there is no right to access;
 - b) Access by a Library employee who does not need the information for their duties;
 - c) Storage of information in an unsecured manner that allows unauthorized access.
- **Privacy Impact Assessment (PIA)** – A process used to identify and mitigate privacy risks when introducing new or significantly changed programs, projects, or services that involve personal information.
- **Privacy Officer** – The individual designated by the Library Board or Library Manager to oversee compliance with the Privacy Management Program and the Protection of Privacy Act, including handling privacy breaches, training, and responding to access requests.
- **Record** – Any recorded information, regardless of medium or format, created or received in the course of business. Records include, but are not limited to, emails, registrations, waivers, database entries, sticky notes, photographs, and video recordings.
- **Security Classification** – A categorization of information based on sensitivity, which determines the level of administrative, technical, and physical safeguards required to protect it.

POLICY

Designation of a privacy officer Section 6(1)a (MIN)

As a public body under the Protection of Privacy Act (POPA), the Board allows access to its records while ensuring the protection of the privacy of individuals’ personal information. The Board designates the Library Manager as the Head, in accordance with POPA. The Head may delegate specified responsibilities under the Act.

Correction of Personal Information Section 7

An individual who believes there is an error or omission in their personal information held by the PJJ may request that their information be corrected, in accordance with guidelines outlined in Section 7 of the POPA.

Notification of Incident or Loss of Personal Information Section 10(2)

If an incident occurs involving the loss of, unauthorized access to, or unauthorized disclosure of personal information in the Library’s custody where there is real risk of significant harm to an individual as a result of that loss, the Library will give notice to



- a) the individual
- b) the Library Board
- c) the Commissioner
- d) the Minister

Request for Review Section 38(2)

If a complaint regarding personal information about an individual has been received by P JL, a request for review cannot be delivered to the Commissioner unless P JL does not respond to the complaint within 30 business days of receiving the complaint.

Creation, Use, and Disclosure of Personal Information Section 6(1) ii (MIN)

P JL may create and use non-personal data for statistics to assist in marketing and decisions about library services. The library will ensure that individuals cannot be re-identified.

Personal Information in Automated Systems Section 6(1) iii (MIN)

P JL does not use automated systems to generate content or make decisions, recommendations, or predictions.

Security Classification System Section 6(1) c (MIN)

High-sensitivity information is defined in the (Ministerial) Regulations to include personal information related to biometric, financial, or personal information regarding a minor, senior, or vulnerable individual. Any high-sensitivity information will be protected with additional safeguards.

Mandatory Training Section 6(1) d (MIN)

P JL staff will be trained annually regarding their responsibilities under PO PA. As part of their orientation all employees, volunteers, board members, contractors, and any agent providing service on behalf of the library are required to sign and adhering to P JL the [Oath of Confidentiality \(Appendix A\)](#). Indicated they have been trained and understand their responsibilities as per the library's P MP

Review of Privacy Management Program Section 6(1) e (MIN)

The Library Privacy Management Program will be reviewed and updated, if needed, every three years.

Privacy Impact Assessments Section 7(1) (MIN)

P JL will conduct a Privacy Impact Assessment (PIA) whenever there is new or changes to any administrative practice, program, project, or service that will involve the collection, use, or disclosure of personal information if one or more of the following apply:

- a) the loss of personal information could result in significant harm
- b) one or more of the factors requiring the submission of a PIA to the Commissioner apply. See Section 7(5) (MIN)



The Library will submit a copy of any PIA to the Commissioner, if required by guidelines outlined in the (Ministerial) Regulation or by specific request of the Commissioner.

A Privacy Impact Assessment must:

- include a summary of the purpose of the collection, use, or disclosure of personal information for the new, or substantial change to an existing, administrative practice, program, project, or service
- identify the types of personal information that will be collected, used or disclosed and reasonable security arrangements in place to protect that personal information.
- identify the legal authorities for the collection, use, or disclosure of the personal information
- identify of any privacy risks and mitigation strategies respecting the personal Information
- identify the administrative, physical, and technical safeguards in place to protect the personal information
- describe accuracy, correction, and retention procedures that will be implemented to ensure the personal information is accurate and complete

Completed PIAs will be retained for six years. See Records Retention Policy.

Consent to Gather Personal Information Section 6(2) iv (MIN)

PJL will require consent for the gathering of personal information. If the information is to be used to make a decision that directly affects the individual, the library will retain the records for one year, or the amount of time agreed to by

- a) The individual
- b) The Library Manager, or the “Head”
- c) The Library Records Retention Policy

Manner of Collection Section 5(2)

PJL will collect personal information directly from the individual the information is about. A collection notice will be provided at the time of collection and can be provided either in writing, or verbally during an in-person conversation. The collection notice must include:

- a) The purpose for which the information is collected
- b) The specific legal authority for the collection
- c) The contact information to which the individual may direct the individual’s questions about the collection

Administrative, Technical, and Physical Safeguards Section 6(2) b (MIN)

- **Administrative Safeguards:** PJL will restrict access to personal information to those who need it for the regular duties of their employment.



- **Physical Safeguards:** Personal information will be locked in regular or fire-proof filing cabinets depending on the Security Classification of the information.
- **Technical Safeguards:** PJI via the Parkland Regional Library System will employ firewalls and restrictions to electronic access to personal information within the SuperNet or Cloud-based storage.

Delegation by Head of Public Body Section 55

See APPENDIX B – Protection of Privacy Act Delegation Tables



Appendix A

Oath of Confidentiality

As an Employee, Volunteer or, Board Member of the Ponoka Jubilee Library, it is understood and hereby agreed to abide by the following conditions by the undersigned:

1. Any information, recorded or otherwise, received or acquired in connection with any duties is considered confidential. Confidential information includes all records that may or may not divulge personal information.
2. All information given out or discovered in the course of any duties or with regards to all library operations shall be held in confidence.
3. Employees, Volunteers or, Board Members agree not to use or disclose confidential information for their own personal benefit or the benefit of any other person, corporation or entity for a period of 5 years, after leaving or being terminated, from any of the above noted positions.
4. At all times, the undersigned shall act in a professional manner in the performance of any duties as an Employee, Volunteer or, Board Member of the Ponoka Jubilee Library.

I, _____

(Name of Person Taking Oath)

do solemnly swear (affirm) that I will abide by the above noted conditions as part of completing duties or any library operations with the Ponoka Jubilee Library.

Signed this _____ day of _____, 2_____.

_____/_____

(Print Name / Sign Name)

(Library Manager or Board Chair)

Appendix B

Protection of Privacy Act - Delegation Tables

Duty, power or function of Head	Section reference	Retained by Head	Delegated to Privacy Officer
Collection, Correction, Protection of Personal Information			
Authority to set aside collection requirements	5(3), (4)	X	
Authority to decide on requests for correction of personal information	7(1)	X	
Duty to correct, annotate or link personal information, duty to notify previous recipients	7(3), (4)	X	
Duty to give notice to individual requesting correction	7(7)	X	
Authority to transfer a request for correction	8	X	
Duty to ensure protection of personal information by making reasonable security arrangements	10(1) Regulation (MIN) 2,3	X	
Duty to notify the affected individual when there exists a significant risk of harm	10(2) Regulation (MIN) 4	X	
Duty to ensure protection of data derived from personal information	20	X	
Duty to ensure protection of data derived from non-personal data	24	X	
Use and Disclosure of Personal Information			
Establishing rules for electronic consent	Regulation 2(4)(a)	X	

Establishing rules for oral consent	Regulation 2(5)(a)	X	
Authority to disclose to guardian of a minor	54(1)(e)	X	
Authority to disclose to relative or adult interdependent partner of deceased individual	13(1)(s)	X	
Authority to disclose to avert imminent danger to health or safety	13(1)(cc) Regulation 1(1)(b)	X	
Authority to approve conditions for disclosure for research and statistical purposes and for administration of research agreements	15	X	
Reviews and Complaints			
Authority to ask the Commissioner for advice	28(1)	X	
Authority to require Commissioner to examine original record on site	29(4)	X	
Right to make representations to the Commissioner	41(6),(8)	X	
Duty to comply with Commissioner's Order	44	X	
General Provisions			
Duty to publish a directory of the body's personal information banks and keep it current	57(2),(5)		X
Duty to record uses or disclosures of personal information not included in directory	57(4)	X	

Delegation Table - Administrative Responsibilities in the Protection or Privacy Act and Regulation that May be Assigned

Duty, power or function or public body	Section reference	Retained by Head	Delegated to Privacy Officer
Collection, Accuracy and Retention of Personal Information			
Establishing controls over the collection, use, and disclosure of personal information	2(a)	X	
Authorizing routine correction of personal information	2(b)	X	
Ensuring authorized purpose of collection	4	X	
Assuring proper collection and notification	5	X	
Assuring accuracy of personal information	6(a)	X	
Applying retention standards	6(b)	X	
Use and Disclosure of Personal Information			
Assuring appropriate uses	12	X	
Assuring appropriate purposes of data matching	17	X	
Assuring appropriate uses of data derived from personal information	18	X	
Assuring appropriate purposes of disclosure of data derived from personal information	19	X	
Assuring appropriate purposes for creation of non-personal data	21 Regulation (MIN) 5(1)	X	
Assuring appropriate use and disclosure of non-personal data	22, 23 Regulation (MIN) 5(2)	X	