

# Standard

## Creation and Protection of Non-personal Data

This standard falls under *A1477 Data and Information Management Administrative Policy*.

<b>Program Impacted</b>	Civic Services <i>Edmontonians contribute to civic society and are engaged in promoting the quality of the community.</i>  Technology & Data <i>The City of Edmonton's technology and data are leveraged to enable quality decision-making and enhance innovative service delivery.</i>
<b>Approved By</b>	Aileen Giesbrecht, City Clerk
<b>Date of Approval</b>	May 13, 2026
<b>Approval History</b>	N/A
<b>Next Scheduled Review</b>	May 13, 2027

### Standard Statement

This standard governs the creation and protection of non-personal data as required by the *Protection of Privacy Act (POPA)* S21-24 and *Protection of Privacy (Ministerial) Regulation, Alta Reg 143/2025* S5.

The following are not considered non-personal data and do not fall under this standard:

- the redaction of information from a record as part of a response to an access to information request,
- the creation of a record without identifiable personal information using unstructured data, which may have contained personal information, for routine or proactive disclosure only, and
- the production of a report, summary or other publication containing non-personal data that is in aggregate or statistical form.

### Scope

This standard applies to City of Edmonton employees, contractors, volunteers, Council Committees and any individuals for whom the City Clerk acts as the Access and Privacy Head. It applies to these parties whenever their work involves creating, collecting, receiving, accessing, using, disclosing, storing, maintaining, destroying

or transferring City records and information. All individuals listed above are responsible for protecting the privacy and confidentiality of personal information in accordance with POPA.

## **Definitions**

*Data derived from personal information* means data created by data matching, and that identifies any individual whose personal information was used in the data matching.

*Data matching* means linking personal information between two or more databases or other electronic sources of information.

*Non-personal data* means data, including data derived from personal information, that has been generated, modified or anonymized so that it does not identify any individual, and includes synthetic data.

*Personal information* means any recorded information about an identifiable individual, including but not limited to:

- a) the individual's name, home or business address, home or business telephone number, home or business email address, or other contact information, except where the individual has provided the information on behalf of the individual's employer or principal in the individual's capacity as an employee or agent;
- b) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations;
- c) the individual's age, gender identity, sex, sexual orientation, marital status or family status;
- d) an identifying number, symbol or other particular assigned to the individual;
- e) the individual's fingerprints, other biometric information, blood type, genetic information or inheritable characteristics;
- f) information about the individual's health and health care history, including information about the individual's physical or mental health;
- g) information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given;
- h) anyone else's opinions about the individual; and
- i) the individual's personal views or opinions, except if they are about someone else.

*Structured data* means data that resides in fixed fields (rows and columns) within a record or file in a database.

*Synthetic data* means artificial data created to maintain the structure and patterns of real data without being linked to any individual in the original data set.

*Unstructured data* means information that does not reside in fixed fields (rows and columns) of a database.

### **Standard Specification**

The City of Edmonton will create non-personal data only for:

- a) research and analysis, and/or
- b) planning, administering, delivering, managing, monitoring or evaluating a program or service.

This non-personal data will be created in accordance with generally accepted best practices and any prescribed requirements set out in POPA regulations.

When creating non-personal data, the City of Edmonton will use only data already under its custody and control. At the time of creation, the City of Edmonton will record the following:

- a) a description of the personal information or data derived from personal information used to create the non-personal data,
- b) the purpose of the non-personal data,
- c) the method used to create the non-personal, and
- d) assessment results that confirm individuals cannot be identified or re-identified from the non-personal data.

The record of the above must be maintained for the life of the non-personal data and in accordance with the City of Edmonton Classification and Retention Schedule.

The City of Edmonton will disclose non-personal data to an individual outside of the corporation only for the following purposes:

- a) research and analysis, and/or
- b) planning, administering, delivering, managing, monitoring or evaluating a program or service.

Any non-personal data to be disclosed to an individual outside of the corporation will only be released upon the signature of an agreement specifying:

- a) security and confidentiality requirements,
- b) the prohibition of any actual or attempted re-identification of the non-personal data,
- c) the prohibition of further disclosure of the non-personal data without the express written consent of the City of Edmonton, and
- d) the requirement to destroy the data when it is no longer needed.

Agreements may be long-form written documents, but checking a box to agree to terms and conditions may also constitute such an agreement.

## Compliance

All City of Edmonton employees, contractors, volunteers, Council Committees and any individuals for whom the City Clerk acts as the Access and Privacy Head are responsible for maintaining the privacy and confidentiality of information in accordance with POPA. Branch managers are accountable for ensuring that privacy practices within their branches comply with legislation and City of Edmonton policy tools, including the *Corporate Records and Information Management Accountability Model (RASCI)*. Failure to comply with this standard could result in the loss of personal information, damage to the City of Edmonton's reputation, unnecessary costs and fines, increased legal risk, information breaches and complaints from the public.

## References and Supporting Resources

### *Legislation*

- [Protection of Privacy Act, SA 2024, c P-28.5](#)
- [Protection of Privacy \(Ministerial\) Regulation, Alta Reg 143/2025](#)
- [Protection of Privacy Regulation, Alta Reg 132/2025](#)
- [City Administration Bylaw, Bylaw 16620](#)
- [A1477 Data and Information Management Administrative Policy](#)

### *Supporting Resources*

- [City of Edmonton Delegation of Authority Order](#)
- [Corporate Information Management Glossary of Terms](#)