

Procedure Privacy

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

Program Impacted	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>
Approved By	Aileen Giesbrecht, City Clerk
Date of Approval	May 13, 2026
Approval History	N/A
Next Scheduled Review	May 13, 2027

Procedure Statement

This procedure is to be used by all City of Edmonton employees to ensure compliance with the *Protection of Privacy Act (POPA)* and to establish our commitment to protecting all personal and non-personal information, as well as data derived from personal information, that the City collects, creates, uses or discloses.

Scope

This procedure 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.

Procedure Description

This procedure provides an introduction to the Privacy (P) functional domain, as defined in *A1477 Data and Information Management Administrative Policy*:

“[The] Privacy (P) [function] maintains individual privacy, ensures compliance with the *Protection of Privacy Act* and applies high ethical and technical standards with regards to privacy principles.”

These privacy principles include:

- *Careful use of personal information*: The City of Edmonton will use only the personal information that is absolutely necessary for research, analysis or program and service design and delivery. In each instance, the City will use the least amount of personal information necessary to achieve the purpose. Wherever possible, the City of Edmonton will use non-personal data. The City of Edmonton will not sell personal information in any circumstance or for any purpose, including marketing and advertising.
- *Clear sharing regulation*: The City of Edmonton will have clear rules for when and how to share information with other public bodies for purposes authorized by POPA.
- *Transparent use for automated systems*: The City of Edmonton will notify individuals if their information is used in an automated system to generate content or make decisions, recommendations or predictions.
- *Proactive analysis and mitigation of potential privacy impacts*: The City of Edmonton will ensure that whenever a system involving personal information is being developed or substantially changed, the City will do a privacy impact assessment to analyse potential impacts and remain compliant with POPA.
- *Immediate notification of parties affected by privacy incidents*: The City of Edmonton will notify individuals about any potential privacy breach where there is a real risk of significant harm.

Definitions

Access and Privacy Head of the Public Body means the City Clerk, to whom the City Manager, as the head of the public body, has delegated all powers, duties, and functions under the *Access to Information Act* (ATIA) and the *Protection of Privacy Act* (POPA), except the power to delegate under section 87 of ATIA and section 55 of POPA.

Data derived from personal information means data created by data matching 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. It 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.

Procedure Specification

City of Edmonton employees, contractors, volunteers, Council Committees and any individuals for whom the City Clerk acts as the Access and Privacy Head are the protectors of the City's information, including:

- Personal information
- Data derived from personal information
- Non-personal data

They are required to:

- Respect the confidentiality of personal information
- Comply with the City's and their branch's information control and security systems
- Report any privacy incidents to their immediate supervisor or in accordance with the Privacy Incident Risk Assessment and Notification Standard.

Within their branches, branch managers are accountable for ensuring that privacy is managed and complies with POPA and corporate policy tools. This includes:

- Providing privacy strategies, goals, procedures, standards and guidelines for the collection, use and disclosure of personal information that applies to their lines of business

- Ensuring that managers, supervisors and employees receive appropriate privacy training, thereby providing adequate information to all employees with respect to their responsibilities under POPA
- Being responsible for personal information controls, security systems and decisions about the management of personal information
- Ensuring that a Privacy Impact Assessment is included in the initial plan stage for new or updated services, projects or programs and that resources are assigned to complete the Privacy Impact Assessment
- Ensuring that requests for correction of personal information are implemented within their records and systems
- Supporting a culture of privacy compliance and respect for personal information

The City Clerk is the privacy officer for the City of Edmonton, ensuring that the City collects, uses and discloses an individual's personal information only for authorized purposes. The City Clerk oversees the privacy management program, which provides corporate direction on how the City will comply with POPA. The *Privacy Management Program Charter* lays out the program's purpose, goals and components.

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)* and the *Access to Information and Protection of Privacy Authority Chart*. Failure to comply with this guideline could result in the loss of personal information, damage to the City of Edmonton's reputation, 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](#)

- [Privacy Management Program Charter](#)