



# Privacy Charter

The City of Calgary



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# Privacy Statement

## CITIZEN FOCUS

The City is committed to protecting your personal information.

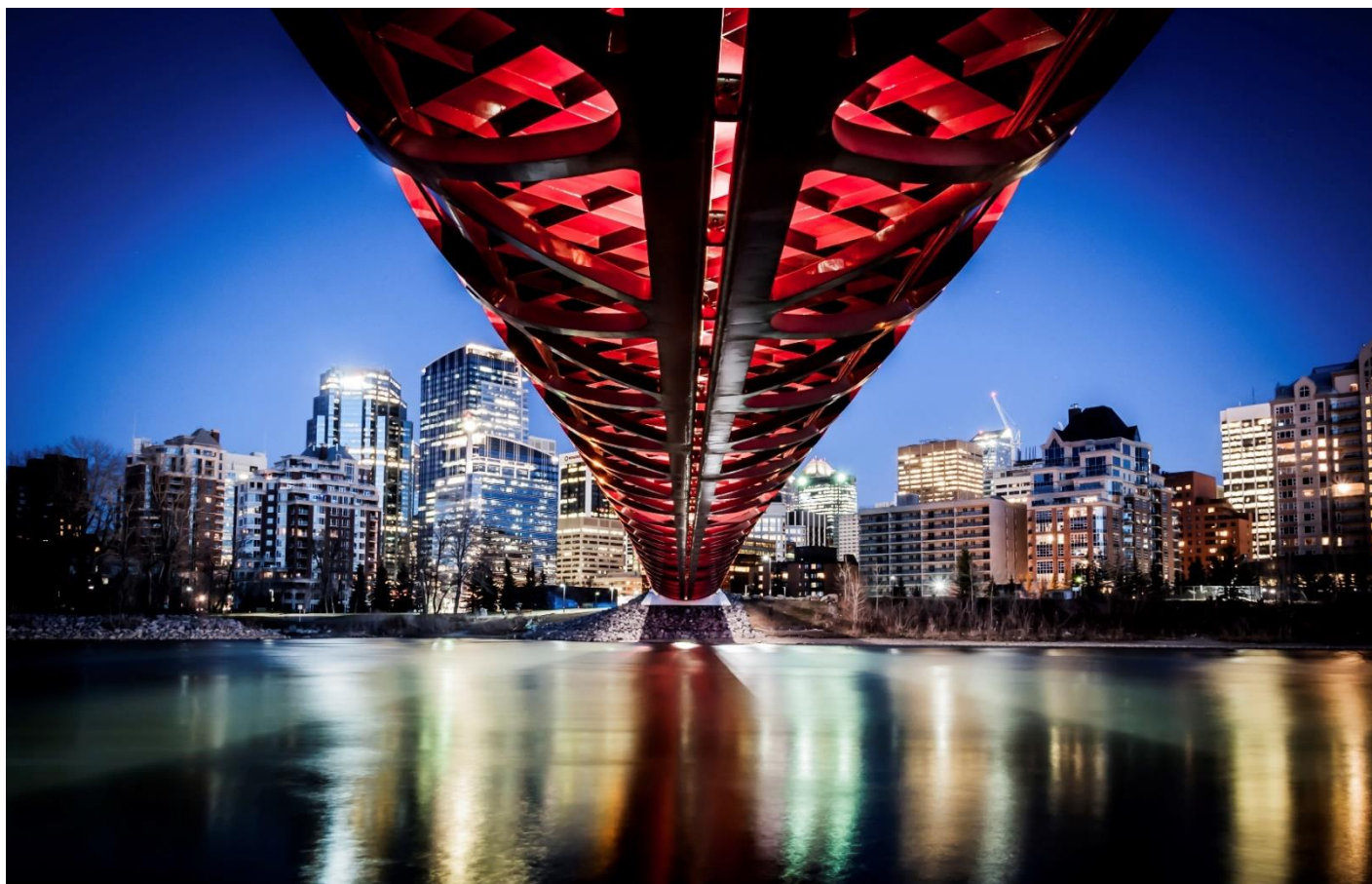
We believe in providing clear, transparent and accessible information about the types of personal information we collect, how it is used and the steps we take to ensure your personal information is handled appropriately at The City.

The City of Calgary (“The City”, “we”, “us” or “our”) is committed to protecting personal information we collect to deliver programs and services to the public. We are also committed to supporting the rights of individuals to access or correct personal information about themselves held by The City.

Our privacy practices have been designed to ensure compliance with Alberta’s *Freedom of Information and Protection of Privacy Act* (“FOIP Act”).

Part of The City’s commitment to privacy is to make information available about our practices regarding collection, use and disclosure of personal information, including how we retain and protect the personal information provided to us.

The City is proud to demonstrate this commitment with this Privacy Charter, which has been developed to provide clear, transparent and accessible information about The City’s internal privacy practices.



# The City of Calgary's Privacy Vision and Principles

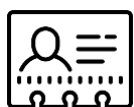
**Our Privacy Vision:** *Integrated privacy governance and practices that strengthen public trust and delivery of City services.* The following privacy principles build on Alberta's access and privacy legislation, and guide The City's collection, use and disclosure practices, ensuring that decisions concerning personal information promote a privacy culture.

Privacy Principles	Description
<b>DATA MINIMIZATION</b>	The City identifies the minimum amount of data needed and limits collection of personal information to only that which is required to deliver City services or programs. Personal information held by The City is regularly reviewed and deleted when no longer required.
<b>NOTICE</b>	The City provides individuals with clear, transparent and concise information about the purpose for which we collect personal information and its intended use at the time of collection.
<b>COLLABORATION</b>	The City protects personal information through collaborative working relationships that identify potential privacy and security risks and deliver solutions.
<b>DE-IDENTIFICATION AND DATA ANONYMIZATION</b>	Before analyzing and sharing data, internally or externally, The City takes steps to prevent personal information from being revealed and considers the circumstances in which data may become publicly available.
<b>PRIVACY BY DESIGN</b>	<p>The City recognizes Privacy by Design<sup>1</sup> as an essential component of its responsibility for privacy protection, and practices the seven Privacy by Design foundational principles:</p> <ol style="list-style-type: none"><li>1. Proactive not reactive: Preventative not Remedial</li><li>2. Privacy as the default setting</li><li>3. Privacy embedded into design</li><li>4. Full functionality: positive-sum, not zero-sum</li><li>5. End-to-end security: full lifecycle protection</li><li>6. Visibility and transparency: keep it open</li><li>7. Respect for user privacy: keep it user centric</li></ol>

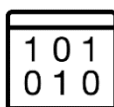
<sup>1</sup> Privacy by Design Centre of Excellence. Ryerson University. Available [online](#)

# What is “Personal Information”?

The *FOIP* Act defines "personal information" as recorded information of an identifiable individual including, but not limited to:



The individual's name, home or business address or home or business telephone number



An identifying number, symbol or other particular assigned to the individual



Information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given



The individual's race, national or ethnic origin, colour or religious or political beliefs or associations



The individual's fingerprints, blood type or inheritable characteristics



Information about the individual's health and health care history, including information about a physical or mental disability



Anyone else's opinions about the individual



The individual's personal views or opinions, except if they are about someone else

# Why The City of Calgary Collects Personal Information

## The City may require personal information to deliver services or programs.

While specific personal information collection depends on the service or program, we may collect it for the following reasons:

- send you information and communications;
- respond to your requests;
- process a transaction or to enroll in a City program;
- meet legal or regulatory requirements;
- determine eligibility for programs;
- for payment purposes;
- standard personnel and benefits administration;
- confirm identity;
- for emergency purposes; or
- for internal purposes such as to analyze and manage our day-to-day business operations and improve our programs and services.

**Section 33 of the *FOIP Act*** provides that no personal information may be collected by or for The City unless:

- the collection of that information is expressly authorized by an enactment of Alberta or Canada;
- that information is collected for the purpose of law enforcement; or
- that information relates directly to and is necessary for an operating program or activity of the public body.



# What Personal Information The City of Calgary collects

The City limits collection of your personal information by only collecting personal information to the extent necessary to carry out our business purpose(s) in a reasonable manner. Depending on the program or service, we may collect some of the following types of personal information:

- name, home or business address or home or business telephone number,
- race, national or ethnic origin, colour or religious or political beliefs or associations,
- age, sex, marital status or family status,
- an identifying number, symbol or other particular assigned to the individual,
- fingerprints, blood type or inheritable characteristics,
- information about health and health care history, including information about a physical or mental disability,
- information about educational, financial, employment or criminal history, including criminal records where a pardon has been given,
- anyone else's opinions about the individual, and
- the individual's personal views or opinions.

The City commits to keeping your personal information up-to-date and accurate, and to do so we rely on you to tell us if your personal information has changed. For example, your name, address, telephone number or email address.



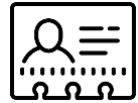
The City may ask that for personal information when interacting with us in the following ways:

if i want to...

The city may collect my...

register for a recreation course

Name, age range, email address, and phone number



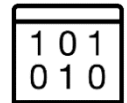
apply for a home improvement permit

Name, email address, address, and phone number



Apply for the tax installment payment plan (TIPP)

Name, address, banking information, and contact information



apply for a volunteer position with the city

Name, contact information, employment or volunteer history, and references



submit a request to access my personal information

Name, address, email address, and phone number



submit a complaint via 3-1-1

Name, call back number, details about complaint



apply for affordable housing

Name, contact information, financial information



This is a list of examples. The City will collect personal information to the extent that is necessary for carrying out our business purpose(s) in a reasonable manner.





# The City of Calgary Website and Collection of Personal Information

The City is committed to providing our visitors with a website that respects their privacy. Personal information is only obtained if you supply it voluntarily through contacting The City via email or online forms, or by setting up a user account. **The City does not automatically gather personal information.** Any personal information you do provide on our website is protected under Alberta's FOIP Act. This means that at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected, and how you can contact The City if you have questions about the collection and/or use.

When you visit calgary.ca, The City's web server automatically collects a limited amount of non-personal standard information essential to the operation and evaluation of The City's website. This information includes:

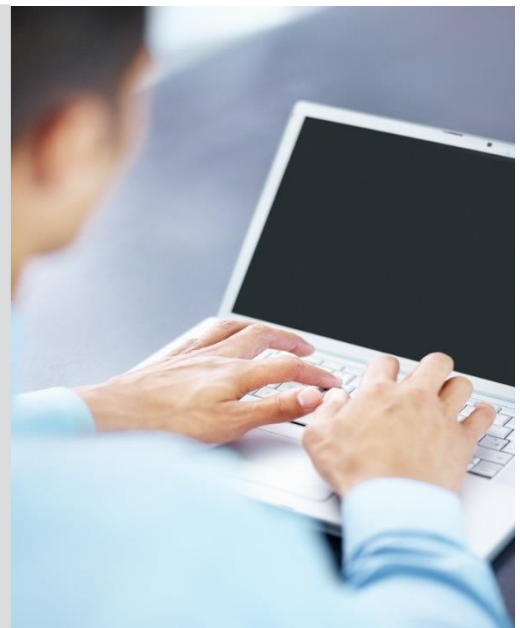
- the date and time of your page request;
- the Internet Protocol (IP) address your computer is using to receive information;
- the type and version of your browser; and
- the name and size of the file you requested.

This information is not used to identify individuals who visit The City's website.

## Feedback Forms or Service Requests

The personal information you submit through The City's Customer Feedback Forms – including email address and contact information – is collected by The City's Customer Service and Communications team for the purpose of responding to your information or service request.

This information is not disclosed except to authorized personnel (City staff or Contractors) for the purpose of addressing your feedback. Any personal information you submit to The City is secured once it reaches The City's server; however, The City cannot guarantee the security of your information while in transit before it reaches The City's server.

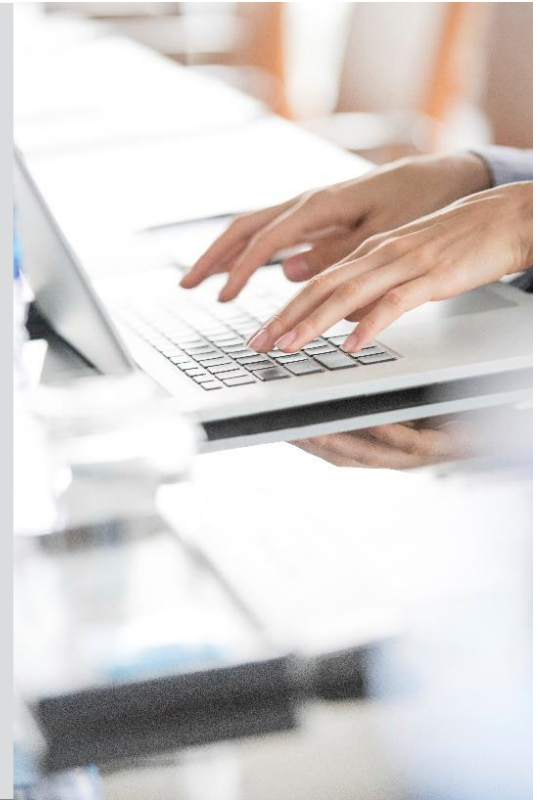


## Cookies

Cookies are temporary files that may be placed on your hard drive while you visit a website. Cookies are used to track how visitors use calgary.ca, but The City does not store personal information through cookies, nor does The City collect personal information from you without your knowledge as you browse this website. Any cookies on calgary.ca are used to aid in the collection of anonymous statistical information such as:

- browser type
- screen size
- traffic patterns
- pages visited

This information helps The City improve both calgary.ca and its services to citizens. It is not disclosed to any third parties. However, if you are concerned about cookies, you can adjust your web browser to reject all cookies or to delete them. All site features, with the exception of interactive maps, should function normally if cookies are disabled.



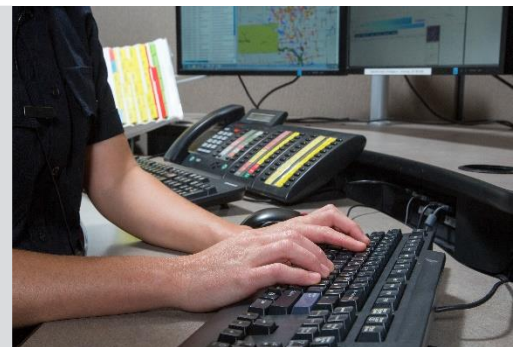
## Security and IP addresses

Your computer uses a unique IP address when browsing the Internet. The City may collect IP addresses to monitor any security breaches on calgary.ca and other online services. No attempt is made to identify users or their usage patterns unless unauthorized use of The City's website is detected or is required for a law enforcement investigation.



## Privacy and External Links

The calgary.ca website contains links to external sites that are not associated with The City. The City is not responsible for the content and the privacy practices of these other websites and The City encourages you to examine each site's privacy policy and disclaimers before providing any personal information.



# How The City of Calgary collects Personal Information

The City may collect personal information verbally or in writing. Notice of collection may be provided in a number of ways, including:



## Forms and Applications

- Hard copy
- Online



## Public Spaces

- Posters
- Displays on service counters



## Verbally

- In person
- Phone pre-recordings

The City will provide notification when we collect personal information. Notification allows us to inform you about:

- the authority for collection of personal information (for example, collection is authorized by an enactment of Alberta or Canada, is collected for the purposes of law enforcement, or the personal information relates directly to and is necessary for an operating program or activity of The City),
- the purpose for collection and how the personal information will be used, and
- who can be contacted at The City to explain why the personal information is being collected, how it will be used and/or disclosed.

# How The City of Calgary collects Personal Information

1

## Minimum Collection



We only collect the minimum amount of personal information required for the operating program or activity.

2

## Direct Collection



We collect your personal information directly from you. Some exceptions may apply under the FOIP Act.

3

## Indirect Collection



We may, in some circumstances, collect personal information indirectly from a third party. Some examples include but are not limited to the following:

- during a health or safety emergency,
- investigation of a contravention of laws or City policies,
- job references,
- verification of eligibility, or
- medical information from a physician.



# Retaining Personal Information at The City of Calgary

## CITIZEN FOCUS

**Records management at The City supports decision-making, improves customer service and support, contributes to better performance of business activities, protects the rights of the public, mitigates risks, and ensures business continuity.**

The FOIP Act provides that if an individual's personal information will be used by The City to make a decision that directly affects the individual, we must retain the personal information for at least one year after using it to make a decision. This ensures that individuals will have a reasonable opportunity to obtain access to that personal information.

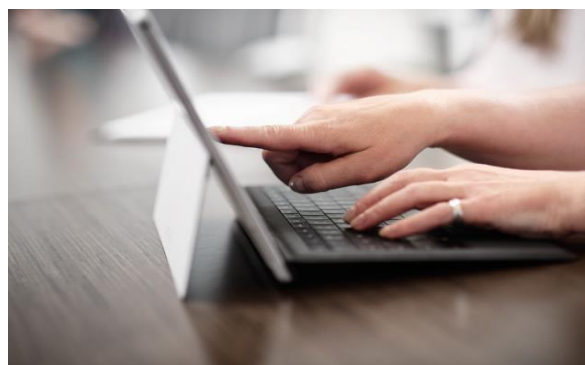
Managing records disposition is part of The City's Records Management Program. The City's mandate is to retain City records until they have met operational, legal, fiscal and archival requirements as set out in the Corporate Records Classification and Retention Schedule (CRCRS).

We have established retention periods for City records, including those with personal information. We are committed to only retain personal information for as long as reasonably necessary for the fulfillment of The City's obligations and responsibilities.



# How The City of Calgary uses and discloses Personal Information

The City may only use and disclose personal information to the extent necessary to enable The City to provide services, protect the public's safety, and deliver our programs and activities. We commit to collect only as much personal information as is necessary and to limit information use and disclosure to the purpose provided at the time of collection.



Subject to applicable laws, The City may share your personal information for the purposes of:

- delivering services, programs or activities by suppliers, vendors, or agents contracted to The City;
- to law enforcement to assist in an investigation;
- for standard personnel and benefit administration;
- providing references; and
- when consent to disclosure is provided, using the prescribed form.

The City engages in many processes and procedures to guard against improper collection, use or disclosure of personal information in its custody or under its control:

- the **Privacy Impact Assessment (“PIA”)** process enables data use minimization by ensuring the collection of personal information is authorized, limited and the use is consistent with the purpose of collection;
- **policies** are in place to control the use of personal information. These policies
- define the classification of information and clearly define how technology can be used to store, transmit and use information of different classifications; and
- **technical controls and auditing** is used to limit data exposure and restrict access to those that have a business need. These controls include access controls, email management systems, file auditing and security and application level security.

# How The City of Calgary protects Personal Information

The City is committed to protecting your personal information from unauthorized collection, use, disclosure or destruction by making reasonable security arrangements. We protect personal information by implementing physical, technological and administrative safeguards appropriate to the sensitivity of the information. The following provides examples of the safeguard measures in place at The City:

## CITIZEN FOCUS

**The City is committed to meeting our legal obligations to have reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.**



### Physical

Access and authorization mechanisms (for example, employee access cards) are in place to restrict access to authorized individuals. Physical Security Risk assessments are completed on priority sites and physical security systems are in place to protect sites and information assets. Secure filing rooms and cabinets are provided for personal information storage which include access control mechanisms.



### Technological

Information assets in The City are controlled and protected. With the extensive use of third-party technologies, services and tools, we provide:

- access controls on devices
- access control for applications and databases
- risk management
- intrusion protection
- usage restrictions
- virus protection
- network security
- multi factor authentication

This ensures the right people are accessing the right information they need to perform their jobs, but not more than necessary. The City makes use of these technologies to monitor, audit and report on all aspects of our technical environment to ensure compliance with legislation and our internal City policies.

# How The City of Calgary protects Personal Information



## Administrative

City employees and third parties contracted by The City have access to Administration policies and training to bring awareness to their responsibilities related to information management, security and privacy.

Our Administration policies identify roles and responsibilities, as well as provide direction to staff on the appropriate handling and protection of personal information. These Administration policies, and associated standards, are available in The City's online Administration Policy Library.

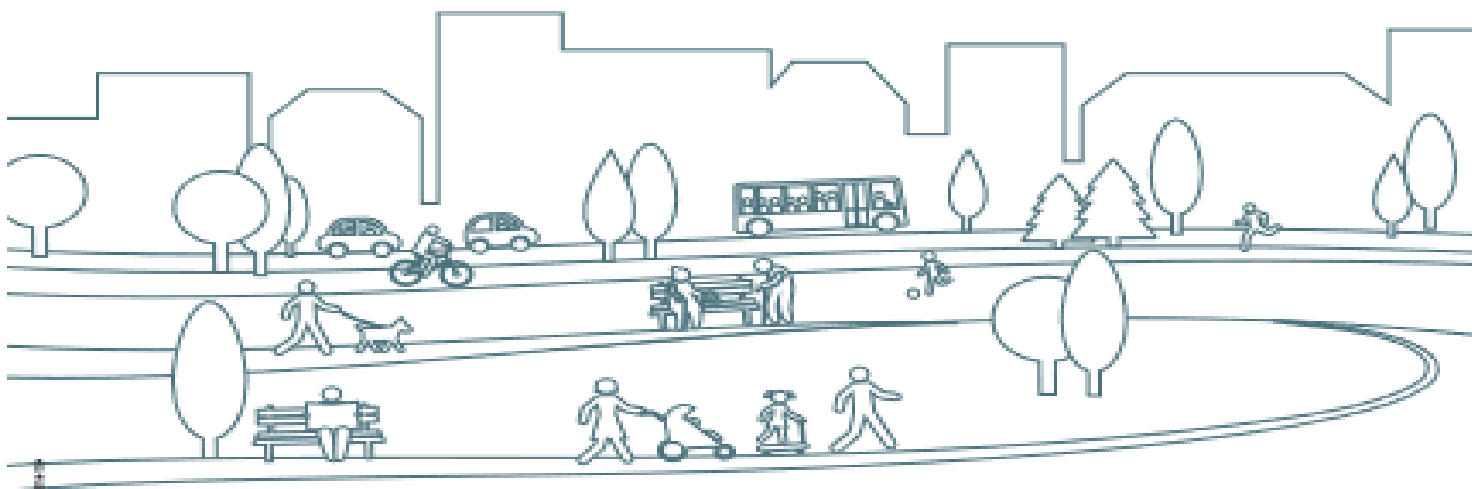
The City protects personal information shared with suppliers, vendors and contractors by a variety of means, including contractual obligations stipulating confidentiality and security of information, as well as privacy breach management protocols.

## Practices to prevent external release of personally identifiable information

External access to City data is centrally managed to ensure all external data access adheres to City policies.

Analyzing the data's suitability for external access relies on:

- Information Security Classification;
- Privacy Impact Assessments for the collection, use and disclosure of personal information; and
- The structure and content of the data.



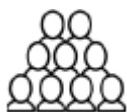


# How The City of Calgary protects Personal Information

Most datasets provided externally come from sources that do not contain personal information (for example, information about City assets). For data that contains personally identifying information, appropriate mitigation strategies are developed to decrease the risk of personal identification, including the following:



**Anonymizing (removing) or pseudonymizing (replacing)** fields containing personally identifying information. For example, removing the owner's name from a dataset of property information.



**Generalizing or aggregating data** to reduce the risk of re-identifying an individual. For example, aggregating Civic Census data to the community or Ward level.



**Partial release** so as not to release data fields containing personal information or suppressing aggregate records that apply to very few individuals, for example, < than or = to 10 individuals.



# Accessing or Correcting Personal Information

Individuals have a right to access or correct their own personal information in the custody or under the control of The City. The City will make every reasonable effort to respond to a request not later

than 30 days after receiving it unless that time limit is extended for one of the reasons set out in the *FOIP Act*, or the request is transferred to another public body.

## CITIZEN FOCUS

**The City values an individual's right to request access to and correction of their personal information and has consistent processes in place to help citizens and employees.**

**The City is committed to keeping personal information accurate to ensure inappropriate or outdated information is not used to make a decision.**

If we are unable to provide access to a request, for example, if providing access would reveal other confidential information, an ongoing investigation or personal information about someone else, we will provide you with the reason(s) for why we are unable to respond to your request.



- **General information** is recorded information held by The City that is not about an identifiable individual.







- **Personal information** is recorded information about an identifiable individual.

In order to maintain our commitment to protecting personal information, The City may request certain details (for example, identification or a unique numerical identifier) for the purposes of verification before providing access to requested personal information. This personal information is not retained beyond verification.



# Accessing or Correcting Personal Information

Individuals who wish to access and/or correct their personal information can complete The City's *Request to Access or Correct Information Form* (CC 739), and submit to The City through any of the following methods:

	Method	Information
	Email	FOIP@calgary.ca
	Mail	FOIP Coordinator The City of Calgary #8007F PO Box 2100, Station M Calgary, Alberta T2P 2M5
	Fax	403-476-4102
	In-Person	Access & Privacy City Clerk's Office Administration Building - First Floor 313 - 7 Avenue SE Calgary, Alberta T2G 2M3

# Making an Access or Privacy Complaint



## Review of The City's Decisions

If you make an access and/or correction request and disagree with the response you received from The City, you have the right to ask the Office of the Information and Privacy Commissioner of Alberta ("OIPC") to review the decision(s) related to your request.

You must request a review from the OIPC within 60 days of a decision being made by The City.

A Request for Review must be directed to the OIPC, using the prescribed forms and processes.

The Review commences with mediation but may proceed to a formal Inquiry conducted by the OIPC.

An Inquiry may result in a binding Order directing The City to take certain actions. Inquiries may be oral or written as determined by the OIPC.

The procedures for OIPC Reviews and Inquiries are published on the OIPC's website.





# Privacy Complaint Management

The City has mechanisms in place to enable citizens and City employees to raise privacy concerns regarding compliance with the FOIP Act or The City's privacy practices.

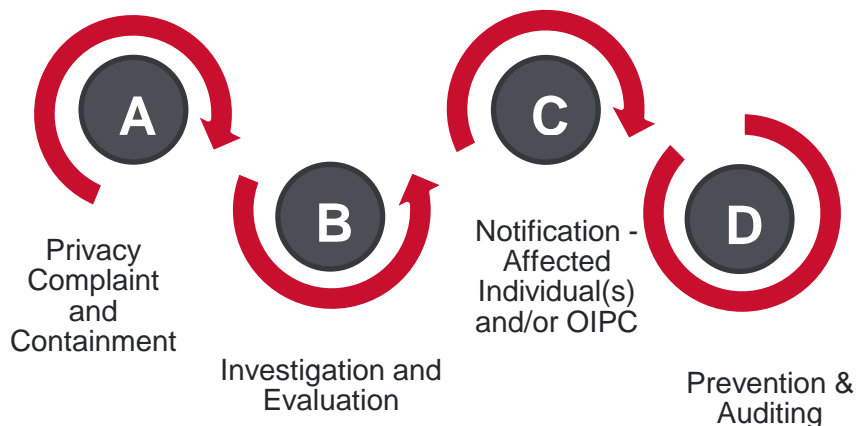
We aim to respond to privacy complaints in an efficient and consistent manner, and we provide opportunities to identify ways to improve privacy practices through recommendations and mitigation strategies aimed to prevent against future privacy risks.

Privacy complaints can be confidentially reported by:



- 1 Notifying The City of Calgary and/or
- 2 Notifying the Office of the Information and Privacy Commissioner ("OIPC") of Alberta.

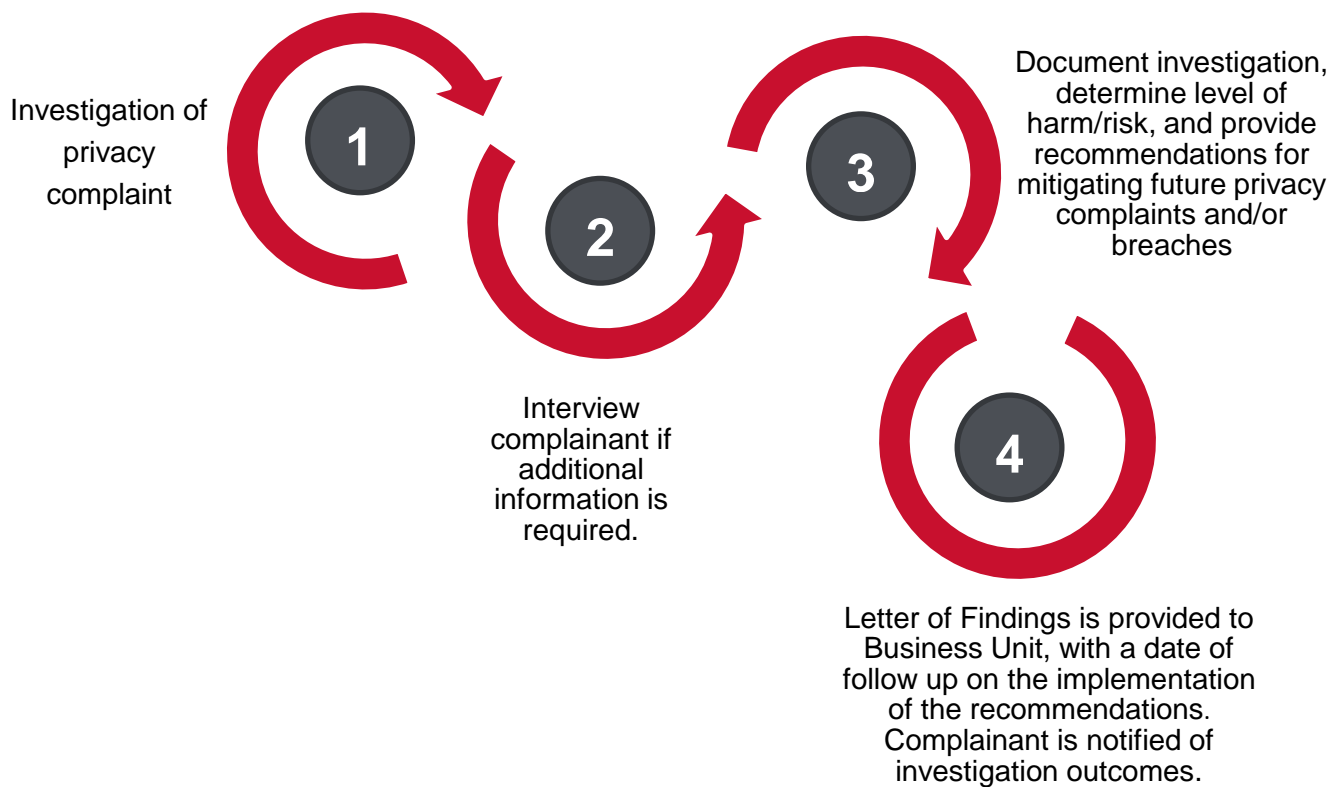
Part of our commitment to privacy is to inform individuals about our internal processes for addressing and responding to complaints about collection, use, disclosure, and destruction of personal information, which include the following steps:



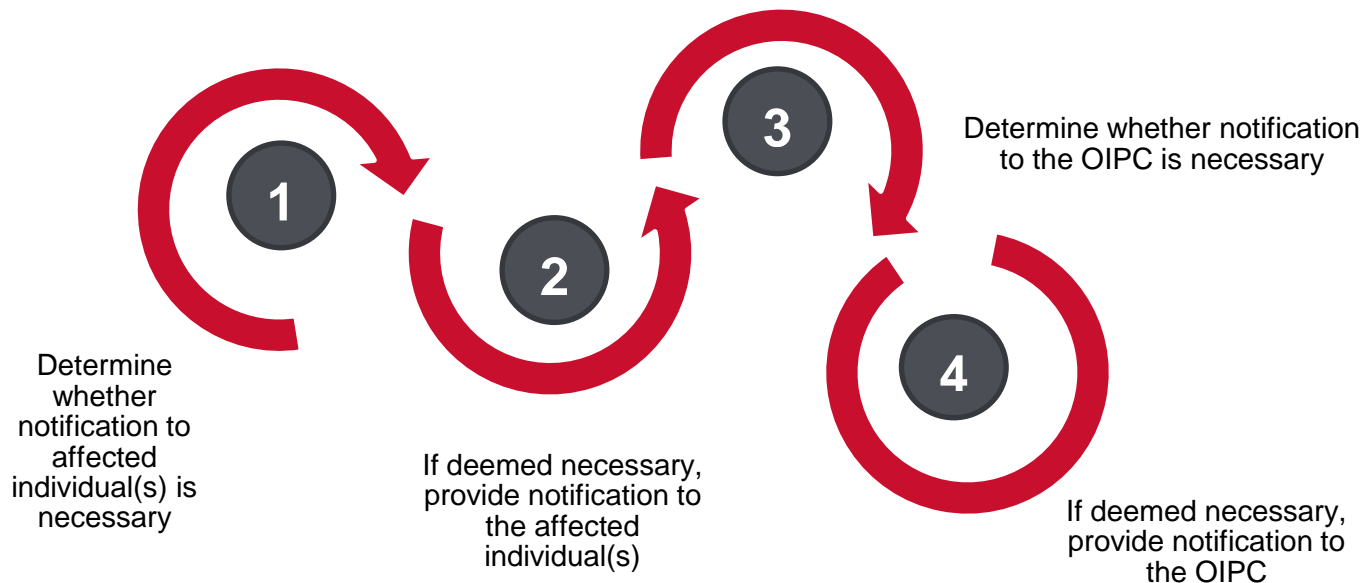
## A. Privacy Complaint and Containment



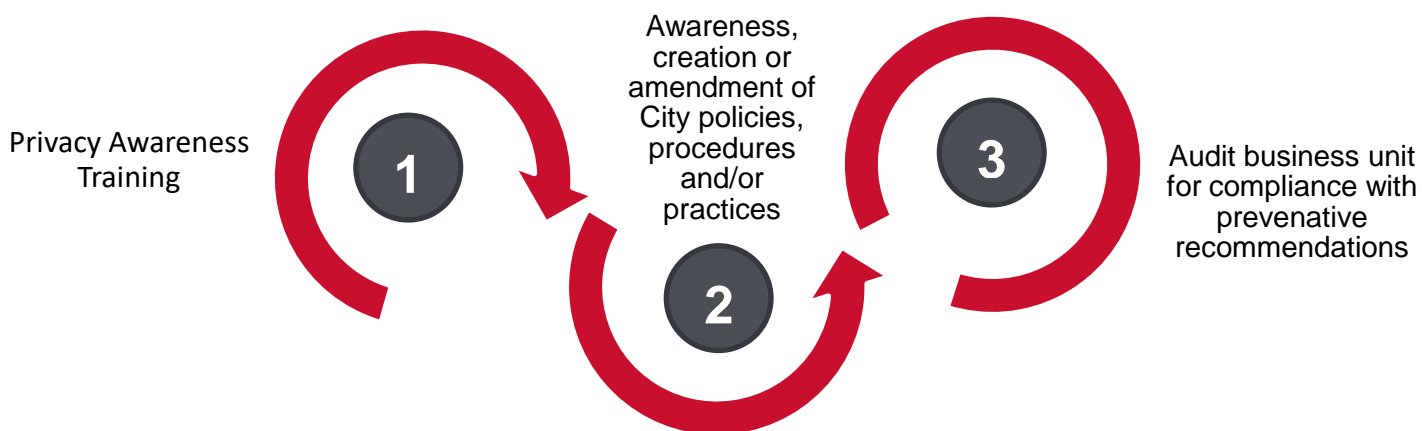
## B. Investigation and Evaluation



### C. Notification – Affected Individual(s) and OIPC



### D. Prevention and Auditing



# Commitment to Provide Privacy Training and Awareness

As part of The City's commitment to fostering a culture that respects privacy, we publish City policies and deliver training such as the following, to raise privacy awareness:

- **City of Calgary Onboarding ("COCO") Welcome Workshop**
- **Code of Conduct Training**
- **Privacy Awareness Training**
- **Access to Information Training**
- **FOIP Program Administrator Training**
- **Information Management & Security Training**
- **Information Management & Security eLearning**
- **Business Unit Specific Access and Privacy Training**
- **Introduction to Records and Information Management and Retention**
- **Introduction to Records and Information Management eLearning**

## CITIZEN FOCUS

The City believes that everyone in our organization has a role to play in protecting personal information.

The City is committed to ensuring our employees have access to policies, standards and training related to how we handle personal information of citizens and City employees.

