

## **Our Commitment to Privacy and Transparency**

Section 25 of the Alberta [Protection of Privacy Act \(POPA\)](#) requires public bodies to have Privacy Management Programs in place consisting of documented policies and procedures that promote the Alberta University of the Arts' (AUArts) compliance with its duties under the POPA.

The key purposes of the program are to:

- Promote accountability by establishing clear roles, responsibilities, and processes for managing privacy risks.
- Foster trust with Albertans, employees, and partners by demonstrating commitment to privacy.
- Specify safeguards to protect personal information, data derived from personal information and non-personal.
- Enable risk management tools to identify, assess, and mitigate privacy risks proactively.
- Support university objectives by integrating privacy into university operations, enabling innovation while respecting individuals' rights.

For more information see: <https://www.alberta.ca/privacy-management>

AUArts takes our privacy obligations seriously.

AUArts is committed to safeguarding the personal information entrusted to us. As a public post-secondary institution in Alberta.

See AUArts overarching Information, Access, Privacy and Security Policy [here](#).

## **Privacy Governance & Accountability**

### **Head of the Public Body**

AUArts designates its President as the Head under ATIA and POPA. The Head is accountable for:

- Ensuring protection of personal information
- Ensuring there is a process for managing privacy incidents and breach notifications
- Overseeing Privacy Impact Assessments
- Ensuring that AUArts maintains the Privacy Management Program
- Making representations to, and complying with orders of, the Information and Privacy Commissioner

### **Access and Privacy Officer**

The Head has delegated authority to the University Secretary to serve as the Access and Privacy Officer.

The Access and Privacy Officer is the point of contact for privacy-related matters such as privacy questions or concerns. They support the development, implementation, and maintenance of the AUArts' privacy policies and/or procedures and Privacy Management Program.

Please direct any questions or concerns about the Privacy Management Program to [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca)

### **Employees and Third-Party Contractors**

Employees are made aware of their obligations under the Protection of Privacy Act (POPA), including the duty to protect information and to report privacy incidents. This is achieved through mandatory privacy training provided during onboarding and on a triennial cycle thereafter. In addition, all employees are required to complete an annual acknowledgment of the Information Access, Privacy, and Security Policy.

When third-party contractors handle personal information related to the provision of services for AUArts they are informed of their privacy and confidentiality obligations and requirements through AUArts' General Services Contract. For more information about third party obligations please email [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca)

POPA Delegation of Authority Listing. [link to be added]

### **Personal Information Inventory & Classification**

AUArts maintains an inventory of personal information and uses a security classification system consistent with POPA requirements. The Personal Information Banks (PIBs) describe the categories of personal information under AUArts' custody or control, the purposes for which the information is collected and used, and the legal authority for such collection. PIBs are documented, kept current, and managed as part of AUArts Records Management Program.

[Information Classification Procedure](#)

[Records Management Policy](#) (for specific Records Schedules please contact [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca))

Record Schedule and PIB Schedule – the schedules and PIBs are currently under review please contact [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca) to request the most current information.

### **Collection, Use & Disclosure of Personal Information**

AUArts collects only necessary personal information and provides collection notices aligned with POPA.

AUArts collects and stores employee, student, and visitor personal information such as names, personal contact information, demographic information, educational background, work history, and medical history.

All employees and contracted service providers must ensure that personal information within AUArts' custody or control is at all times protected. POPA sets out the following standards regarding the collection, use, disclosure, and security of personal information which AUArts is committed to meet:

Personal information will only be collected by AUArts if the collection is authorized by legislation, is necessary for law enforcement, or is necessary for the operation of a program or activity of AUArts. Whenever possible, personal information will be collected directly from the individual. There are limited circumstances when indirect collection is permitted.

When collecting personal information directly from an individual it is a legal requirement to notify them of the specific uses of their information, the legal authority for the collection of that information, if the information collected will be input into automated systems to generate content, make decisions, recommendations or predictions and the contact information of someone at the University who can answer their questions about the collection and use. This must be provided for collections occurring in person, over the telephone, online and on hardcopy forms.

When collecting personal information, it is important to ensure its accuracy whenever possible.

### **Correction of Personal Information**

AUArts is responsible for taking reasonable steps to ensure that personal information in its custody or control is accurate and complete. Individuals whose information is in AUArts' custody or control who believe there is an error or omission in their personal information can make a request to correct the information. Employees who receive a request from an individual to correct their personal information must follow AUArts' Correction of Personal Information process.

[Correction of Personal Information Website](#)

Correction of Personal Information Procedure (in development)

**Use and Disclosure**

Personal information should be used only for the purpose for which it was collected or for a purpose consistent with that initial purpose, meaning the use has a reasonable and direct connection to the original stated purpose.

**AUArts is prohibited from selling personal information**

There are certain clearly defined circumstances within POPA where the release of information is permitted without consent. These circumstances must be reviewed and authorized prior to any disclosure of personal information occurring.

AUArts may disclose personal information if another Act, or regulation authorizes it; to a law enforcement agency in Canada, to assist in a specific investigation being undertaken with a view to a law enforcement proceeding, or from which a law enforcement proceeding is likely to result. AUArts may also disclose personal information if compelling circumstances exist that affect anyone's health or safety.

**Non-Personal Data**

<https://auarts.ca/about-auarts/governance/foip/making-an-access-request>

**Safeguards for Protecting Personal and Non-Personal Information**

Under POPA, AUArts must make "reasonable security arrangements" to protect personal and non-personal information. This includes administrative, physical, and technical safeguards appropriate to the sensitivity of the information being managed. The following are examples of some ways AUArts safeguards and protects information.

**Administrative**

AUArts ensures that it has the **policies and procedures** to facilitate the safeguarding of personal and confidential information in its custody or control are developed and maintained and reviewed regularly. See AUArts Policies and Procedures here:

<https://auarts.ca/about-auarts/governance/policies-and-procedures>

Before implementing proposed new administrative practices or information systems that will change or significantly affect the collection, use and disclosure of personal information, AUArts completes a **Privacy Impact Assessment (PIA)** that describes how the new initiative will affect privacy, and what measures AUArts will put in place to mitigate risks to privacy.

All new employees and service providers (where the service provider is accessing personal information while performing their duties under contract to AUArts) must attend **privacy training**.

### **Physical**

AUArts implements physical access controls to prevent unauthorized access to facilities, workspaces, and storage areas where personal information is housed. Measures include key or card access, visitor management procedures, locked storage, proportionate to the sensitivity of the information and identified risks.

Computers or monitors that are left unattended in reception areas or areas where personal information is processed are secured and logged off, either manually or by default timer.

AUArts uses video surveillance cameras as a physical safeguard to protect facilities, assets, and personal information from unauthorized access, theft, or damage. Camera use is limited to purposes authorized by law, positioned to minimize the collection of personal information, and managed in accordance with approved policies governing notice, access, retention, use, and disclosure of video recordings.

### **Technical**

Employees and contracted service providers must use their AUArts assigned email accounts when conducting any AUArts business.

Firewalls, intrusion detection software, or other technical means are in place to protect internal AUArts networks carrying identifiable personal information and to prevent unauthorized use and malicious software.

Access to AUArts information systems is controlled and password protected. Employees are only given access to the minimum amount of personal information required to fulfill the duties of their existing position.

To detect unauthorized access and prevent modification or misuse of user data in applications, systems may be monitored to ensure conformity to access policies and standards. Appropriate security controls, such as event logs, will be implemented and reviewed as required.

## **Privacy Impact Assessments (PIAs) and Information**

### **Sharing Agreements**

#### **Privacy Impact Assessments**

A Privacy Impact Assessment is a risk management and compliance review process used to identify and address potential information privacy and security issues, thus avoiding costly program, service, or process redesign and minimizing exposure to potential privacy breaches.

AUArts completes PIAs, in accordance with guidance from the Office of the Information and Privacy Commissioner of Alberta (<https://oipc.ab.ca/privacy-impact-assessments>) before implementing new or changed systems involving personal information.

Privacy Impact Assessment training is provided to AUArts' Managers.

#### **Information Sharing Agreements**

Where disclosures of personal information are occurring on a regular basis with an external third party, an Information Sharing Agreement (ISA) should be developed to document the expectations of AUArts and the third party regarding the security and protection of the personal information being disclosed or exchanged. Contact AUArts' Access and Privacy Office [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca) to determine whether an ISA is required and for direction on the completion of an ISA.

#### **Privacy Incident/Breach Response**

A privacy breach occurs when personal information is collected, retained, used, disclosed, accessed, or disposed of in ways that do not comply with the provisions of POPA. If an AUArts employee discovers that personal information in AUArts' custody or control has been inadvertently or intentionally disclosed without authorization, it must immediately report such a breach to the Access and Privacy Office. Third-party contractors must follow the requirements in their contract's

#### **[Privacy Breach Response Website](#)**

Privacy Breach Response Procedure (in development)

AUArts follows POPA's breach notification requirements, notifying affected individuals, the OIPC, and the Minister when required.

### **Privacy Complaints**

Individuals have the right under POPA to file a complaint about the improper collection, use or disclosure of their personal information by AUArts. If an individual wishes to make a complaint about privacy they may do so by emailing [access.privacy@auarts.ca](mailto:access.privacy@auarts.ca) setting out their name and contact information, the nature of the alleged privacy incident, and the names of any individuals at AUArts whom they allege may have been involved. All such complainants will receive a response regarding the disposition of their complaint.

### **Training and Awareness**

Privacy training and awareness helps employees identify personal information, understand their privacy obligations, and are an important part of breach prevention.

AUArts provides ongoing privacy training consistent with POPA. All employees are required to acknowledge the Access, Privacy and Security Policy annually and complete privacy re-training on a triennial cycle. The Access and Privacy Officer also meets regularly with units handling sensitive information to ensure strong privacy practices.

The following privacy topics are addressed in the training:

- An understanding of what constitutes personal information.
- Appropriate collection, use and disclosure of personal and non-personal information.
- An overview of Data Matching and related requirements.
- Reasonable security measures and access controls to protect personal information.
- Identification and reporting of privacy breaches and privacy complaints.
- Privacy impact assessments.
- Privacy Management Program

### **Access to Information Requests (ATIA)**

AUArts is committed to access and transparency and maintains information on its public website for guiding individuals regarding general or personal access to information requests and collaborates with OIPC when necessary.

[Making an Access Request Website](#)

### **Monitoring, Review and Continuous Improvement**

AUArts will regularly review and update its PMP. All policies and procedures are reviewed in accordance with the Policy Development Policy, with typical review on a five-year cycle. A biannual check-in with policy sponsors is also conducted. As the PMP is a new requirement under POPA, AUArts will conduct a shorter informal review cycle in June 2027. Related information governance priorities, such as records management, are reviewed biannually. AUArts also participates in a broader post-secondary network to ensure its practices remain aligned with best practices sector-wide and evolving privacy standards.

New or updated information from the Province of Alberta or the Office of the Information and Privacy Commissioner will added as it becomes available.