

1. Policy Management Program Statement and Accountability

Banff Centre is committed to protecting the personal information of all members of its community. Individuals interacting with Banff Centre should understand how, why, and when their personal information is collected, used, and disclosed; how to request corrections; and when they will be notified of any improper use, access, or disclosure.

The President and CEO is the “Head” of Banff Centre under the *Access to Information Act* (ATIA) and the *Protection of Privacy Act* (POPA) (collectively, the “Privacy Acts”) and is accountable for overall compliance. Day-to-day administration of the Privacy Acts has been delegated to the Privacy, Information and Records Manager, who serves as the Privacy Coordinator and is responsible for the Privacy, Information and Records Office.

2. Governance and Roles

Governance of the Privacy Management Program (PMP) is supported through clearly defined roles:

President & CEO (Head)	Overall accountability for compliance with POPA and ATIA; receives compliance reports and approves material changes to the PMP.
Privacy, Information and Records Manager (Privacy Coordinator)	Leads implementation of the PMP, oversees compliance activities, reports to senior leadership, and acts as the primary contact with the Office of the Information and Privacy Commissioner (OIPC).
Privacy, Information and Records Office	Maintains PMP documentation and coordinates key functions including inventories, privacy impact assessments (PIAs), breach management, training, and monitoring.
Senior Leadership Team	Ensures implementation within their portfolios and addresses compliance risks.
Program / Business Unit Leads	Implement privacy controls in operations and support inventories, PIAs, and records management
Employees and Contractors	Comply with policies and complete required privacy training.

3. Policies, Procedures and Information Assets

The PMP is supported by a structured framework of policies and procedures that guide privacy practices across Banff Centre. Key instruments include the Privacy Policy, Records Management Policy, and procedures addressing access controls, access to information, breach response, collection/use/disclosure, safeguards, Privacy Impact Assessments (PIA), training, roles and responsibilities, classification, and security.

Banff Centre also maintains an inventory of Personal Information Banks (PIBs), which is publicly available and maintained by the Privacy Coordinator.

4. Implementation and Operations

The PMP is operationalized through ongoing activities integrated into Banff Centre's business processes including maintenance and review of personal information inventories; completion of PIAs as required; and ongoing employee and contractor training.

Responsibilities for these activities are shared across Banff Centre to ensure privacy requirements are embedded in daily operations.

5. Monitoring, Compliance and Reporting

The Privacy Coordinator maintains oversight of compliance with POPA and ATIA through ongoing monitoring and structured review.

Monitoring includes:

- periodic review of privacy practices and controls
- review of PIAs and mitigation measures
- analysis of breach records and response effectiveness
- monitoring privacy training completion rates
- tracking access request volumes and timelines

A formal annual compliance review is conducted to confirm that the PMP remains current and implemented; personal information inventories and PIBs are accurate; safeguards are effective and breach trends are understood; and compliance gaps are identified and addressed.

Regular reporting is provided to senior leadership and, where appropriate, the Board or a Board committee and may include data on overall compliance status; PIA activity; breach summaries and corrective actions; training completion; and emerging risks and remediation plans.

Material risks, significant breaches, or systemic issues are escalated promptly to General Counsel. Findings and reports are documented and retained as evidence of compliance with the Privacy Acts.

6. Review, Updates and Records

The PMP is reviewed at least annually, and more frequently where required due to:

- legislative or regulatory changes
- material changes to programs, systems, or data use
- significant privacy breaches or regulatory findings

Updates are approved by the General Counsel and, if material or where otherwise required, by the President & CEO or the Board.

All documentation supporting implementation, monitoring, and reporting is retained in accordance with approved records retention schedules and is available to demonstrate compliance to the [Office of the Information and Privacy Commission \(OIPC\)](#), if required.

For questions regarding the Privacy Management Program contact:

Privacy Coordinator

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