

1. POLICY STATEMENT

Banff Centre is committed to protecting the privacy of Personal Information that is in Banff Centre's Custody or under its Control in accordance with the standards set out in the Acts.

2. PURPOSE

- 2.1. To ensure Banff Centre collects, uses, discloses, protects, disposes of, and, where appropriate, preserves information gathered and generated in the course of operating the programs and activities of Banff Centre in a manner that is consistent with the Acts and associated regulations, other pertinent provincial and federal privacy legislation and Banff Centre policies and procedures and that incorporates a "privacy by design" approach to all internal process and systems;
- 2.2. To facilitate routine access to and active dissemination of recorded information of Banff Centre in accordance with legislation and Banff Centre policies and procedures; and
- 2.3. To ensure Banff Centre will act in an accountable and transparent manner when responding to access requests, correcting records or reporting on privacy incidents.

3. SCOPE

This policy applies to all Personal Information in the Custody or under the Control of Banff Centre and to all Members of the Banff Centre Community.

4. POLICY ELEMENTS

4.1. Access to Information

4.1.1. Banff Centre will make information that is in its Custody or under its Control available to the public in a manner that is compliant with the Acts, other provincial and federal privacy legislation, and Banff Centre policies and procedures.

4.2. Collection of Personal Information

4.2.1. Banff Centre will only collect Personal Information that relates directly to and is necessary for an operating program or activity of Banff Centre or that is otherwise expressly authorized by law. Personal Information will be collected directly from the individual who is the subject of the information except as otherwise permitted by legislation.

4.2.2. Authorized Persons will provide a detailed collection notice at the time Personal Information is collected and will collect the minimum amount of Personal Information required in the circumstances.

4.3. Protection, Use and Disclosure of Personal Information

4.3.1. Banff Centre will establish administrative, physical and technical controls to protect Personal Information from unauthorized access, use, disclosure or destruction.

4.3.2. Authorized Persons shall only use Personal Information that is in the Custody or under the Control of Banff Centre when there is a legitimate need to use such information and only to the level of detail necessary in the circumstances.

4.3.3. Personal Information in the Custody or under the Control of Banff Centre will only be disclosed by Authorized Persons where permitted by the Acts and in compliance with Banff Centre policies and procedures.

4.4. Accuracy and Retention of Personal Information

4.4.1. Banff Centre will make every reasonable effort to ensure that Personal Information that is used is accurate and complete.

4.4.2. An individual who believes there is an error or omission in their Personal Information in the Custody or under the Control of Banff Centre may submit a written request for correction in accordance with Banff Centre's applicable procedure.

4.4.3. Personal Information used to make a decision about the individual must be retained for no less than one year, after which the Personal Information may be destroyed according to the retention periods established in Banff Centre's records retention policy and schedule.

4.5. Data Matching; Non-Personal Data

4.5.1. Data Matching may only occur where: authorized by the Acts; necessary for planning, administering, delivering, managing, monitoring, or evaluating an institutional program or service; and approved by the Head of Banff Centre

4.5.2. Data Matching must not be used to create new decisions about individuals beyond the authorized purpose.

4.5.3. Data Matching shall not be conducted except where authorized under the Acts and consistent with the purpose for which it was collected.

4.5.4. Any use of Data Matching must be properly documented, and any Data Derived from Personal Information must be retained, used, disclosed, and disposed of in accordance with the Acts and all applicable Banff Centre policies and procedures.

4.5.5. Non-Personal Data may be created and/or used only for: research and statistical analysis; learning analytics and institutional planning; and program evaluation and service improvement provided the Non-Personal Data cannot reasonably be re-identified.

4.5.6. Re-identification or attempted re-identification of Non-Personal Data, whether created or received by Banff Centre, is strictly prohibited except where expressly authorized by law.

4.6. Confidentiality of Video Surveillance

4.6.1. Video surveillance on Banff Centre property may only be conducted by Banff Centre's Security Services. A Personal Information collection notice that is easily identifiable and legible will be installed at building entrances that are closest to surveillance camera locations.

4.6.2. Images captured by surveillance cameras on Banff Centre property are considered Personal Information in the Custody and under the Control of Banff Centre and governed by this policy and associated procedures.

4.7. Compliance

4.7.1. Instances of possible non-compliance with the Acts and this policy must be immediately reported to Banff Centre's Privacy Office which will work with applicable departments or offices at Banff Centre to conduct an investigation into the possible non-compliance and make a determination regarding Banff Centre's obligation to notify impacted individuals.

4.7.2. Non-compliance with the Acts, this policy and associated procedures may result in disciplinary action up to and including termination of contract or appointment.

4.7.3. Banff Centre will develop a privacy-first culture and will support understanding of the importance of the Acts by providing and requiring ongoing privacy training.

5. DEFINITIONS

- Privacy Management Program Definitions

6. ASSOCIATED POLICY / PROCEDURE

- Privacy Management Program

7. APPROVAL AUTHORITY

Board of Governors

8. ACCOUNTABILITY

General Counsel

9. POLICY HISTORY

- 9.1. Approved: **February 15, 2024**
- 9.2. Effective: **February 15, 2024**
- 9.3. Revised: **May 29, 2026**
- 9.4. Review Frequency: **Three (3) Years**
- 9.5. Next Review: **May 2029**

9.6. Modification History

Date	Modification
February 15, 2024	Replaces existing Privacy Policy.
May 29, 2026	Revised following the repeal of the <i>Freedom of Information and Protection of Privacy Act</i> (FOIP) and coming into force of the <i>Access to Information Act</i> (ATIA) and <i>Protection of Privacy Act</i> (POPA)