

1. POLICY STATEMENT

Banff Centre is committed to protecting the privacy of individuals who work and study at Banff Centre or who otherwise interact with Banff Centre in accordance with the standards set out in the Act. In compliance with these legislative requirements, Banff Centre will:

- 1.1 Honour the right of individuals to access any records in the Custody or under the Control of Banff Centre including a record containing Personal Information about themselves subject to specific limited exceptions as established by the Act.
- 1.2 Protect Personal Information by making reasonable security arrangements against such risks as unauthorized access, use, disclosure or destruction.

2. PURPOSE

- 2.1. To ensure Banff Centre, through its various departments and offices 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 Act and associated regulations, other pertinent provincial and federal privacy legislation and Banff Centre policies and procedures; and
- 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.

3. SCOPE

This policy applies to 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. It is the policy of Banff Centre to provide access to recorded information that is in its Custody or under its Control in balance with the protection of personal privacy of individuals in a manner that is compliant with the Act and associated regulations, other provincial and federal privacy legislation, and Banff Centre policies and procedures.
- 4.2. The “Head” of Banff Centre, as appointed by the Board of Governors, may delegate to named departments or offices, including the FOIP Office, the authority to act under the Act and associated regulations in accordance with delegated authority.

5. DEFINITIONS

Act. The *Freedom of Information and Protection of Privacy Act*, RSA 2000, c F-25 and associated regulations, as amended from time to time.

Banff Centre Community. Includes those persons involved in or associated with, Banff Centre or its affairs including all artists, contractors, consultants, employees, faculty, participants, volunteers, members of the Board of Governors, and members of the Board of Directors of The Banff Centre Foundation, while they are: on or using Banff Centre property; participating in Banff Centre programs, events or activities (whether virtual or in person); or acting on behalf of Banff Centre.

Custody. Having custody of a record generally means having physical possession of a record that is related to Banff Centre's operation and administration.

Control. Having control of a record means having the power or authority to manage, restrict, regulate, or administer the use of disclosure of the record.

FOIP Office. The office of Banff Centre charged with the responsibility for ensuring the compliance of Banff Centre with the Act with delegated authority from the Head under the Act.

Members of the Banff Centre Community. Those persons involved in conducting Banff Centre affairs including all registered participants, faculty, employees, volunteers, contractors, Directors and Governors.

Personal Information. Information about an identifiable individual as further articulated in the Act.

6. ASSOCIATED POLICY / PROCEDURE

- Access to Information and Protection of Privacy Procedure

7. RELATED POLICIES, FORMS, AND OTHER DOCUMENTS

- *Freedom of Information and Protection of Privacy Act, RSA 2000, c F-25*

8. APPROVAL AUTHORITY

Board of Governors

9. ACCOUNTABILITY

General Counsel

10. POLICY HISTORY

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| 10.1. Approved: | February 15, 2024 |
| 10.2. Effective: | February 15, 2024 |
| 10.3. Review Frequency: | Three (3) Years |
| 10.4. Next Review: | February 2027 |

10.5. Modification History

Date	Modification
February 15, 2024	Replaces existing Privacy Policy.