

PRIVACY POLICY

Policy Section:	Privacy Management Program	Effective Date:	June 11, 2026
Policy Owner:	Vice President, Administration & CFO	Last Revised:	June 4, 2026
Policy Administrator:	Information Access & Legislative Compliance	Review Scheduled:	Every 4 years
Approver:	Executive Leadership Team		
<i>The official controlled version of this document is held with the Legislative Compliance / Policy & Procedure Coordinator.</i>			

A. POLICY STATEMENT

The College is committed to protecting the privacy of individuals who work and study at the College or who otherwise interact with the College in accordance with the standards set out in the Protection of Privacy Act (POPA) and the Access to Information Act (ATIA) As such, Keyano encourages a privacy culture within its operations to meet the expectations of the College Community, and to meet compliance with applicable legislation and regulations.

1. Guiding Principles

- a. Keyano College will collect, use, disclose and manage information in accordance with POPA and ATIA, and other applicable legislation and regulations, such as the Health Information Act.
- b. The College is responsible for personal information under its custody and control and shall designate an individual or individuals who are accountable for the organization's compliance with this policy, POPA, ATIA and other privacy-related legislation.
- c. All members of the College community are responsible to make responsible security measures for the protection of personal, confidential, and sensitive information entrusted to them.
 - i. Employees will only have access to personal information that is needed and necessary to perform their duties.
- d. Keyano College will ensure the College community members are aware of their privacy policies and procedures, through training and education sessions, and other communication means.
- e. Personal information will only be collected when it is necessary for the purpose of an approved activity by the College, or to meet requirements of legislation.
 - i. The purpose of collection of personal information will be clearly stated at or before the information is collected.

1. Where practical, the College will collect personal information directly from individuals.
 2. Information will only be used for the purpose stated in the collection notice or for a consistent purpose.
 - ii. Keyano College is prohibited by legislation to sell personal information in any circumstances or for any purpose, including for marketing or advertising.
 - iii. Keyano College will develop and maintain a Personal Information Banks (PIB) directory of all personal information it houses, as required by POPA.
- f. Personal information will not be released to third parties except with the consent of the individual or as required by law or as required by collective agreement, or as per POPA and ATIA
1. Keyano College may disclose personal information in its alumni records for the purpose of fundraising activities if the College and the person to whom the information is disclosed have entered into a written agreement subject to conditions defined in the Act.
 2. Keyano College may disclose personal information to a person other than a public body for a research purpose, including statistical research subject to the conditions defined in the Act.
- g. Keyano College will make every reasonable effort to ensure that personal information is accurate and complete.
- i. Individuals have the right of access to their personal information and challenge the accuracy and completeness of the information.
 - ii. Keyano will retain personal information for at least one year to allow an individual the right of access. A shorter period may be applied if agreed upon by the individual, the public body and if no other legislative requirement exists as stated in the Records Classification and Retention Schedule.
 - iii. Information that has meet records retention requirements under the Keyano Records Classification and Retention Schedule will be disposed of as per policy.
- h. Keyano College may create and disclose non-personal data for the purpose of research and analysis; planning, administrating, delivering, managing, monitoring or evaluating a program or service.
- i. The College will ensure the security and confidentiality of the disclosed information, prohibit any actual or attempted re-identification of the non-personal data, prohibit any subsequent use or disclosure of the non-personal data without the express authorization of the College, and ensure the destruction of the non-personal data at the earliest reasonable time after it has serviced its purpose.
 - ii. The College will ensure that the person to which the non-personal data has been disclosed has signed an agreement to comply with the approved conditions.
- i. The College will take reasonable security measures to safeguard and protect the information in its possession by following all applicable policies, procedures and legislation.
- i. If personal information is inadvertently disclosed, the College will conduct an internal investigation. Where appropriate, and legislated, the College will notify the Office of the Information and Privacy Commissioner, the Minister, and affected individuals.

- j. Access to information requests will be handled in accordance with the Access to Information Act and the Keyano Access to Information Procedure
- k. From time to time, compliance may be evaluated and determined by a third party or through a review of sample processes by the Privacy Officer.

B. DEFINITIONS

(1)	ATIA:	means the Alberta Access to Information Act.
(2)	Control:	means the College has authority to manage, restrict, or administer the collection, use and disclosure of a record.
(3)	Custody:	means the College has physical possession of a record.
(4)	Employee:	means a person who performs a service for the public body as an appointee, volunteer or student or under a contract or agency relationship with the public body.
(5)	Non-personal information:	means data, including data derived from personal information, that has been generated, modified or anonymized so that it does not identify any individual, and includes synthetic data and any other type of non-personal data identified in the POPA regulations.
(6)	Personal information:	means recorded information about an identifiable individual including, but not limited to name and contact information, age and gender; unique identification numbers (i.e. SIN, driver's license, student number); gender, race, ethnic origin, citizenship; income or marital status; family or marital status; education, employment, health or biometric information; and criminal history.
(7)	Personal Information Bank (PIB):	means a collection of personal information that is organized or retrievable by the name of the individual or by an identifying number, symbol or other particular assigned to an individual.
(8)	POPA:	means the Alberta Protection of Privacy Act.

C. RELATED POLICIES

- Code of Conduct Policy
- Data Breach of Security Policy
- Employee Progressive Discipline Policy
- Safe Disclosure Policy

D. RELATED LEGISLATION

- *Alberta Access to Information Act (ATIA)*

- *Alberta Protection of Privacy Act (POPA)*

E. RELATED DOCUMENTS

- Access to Information Procedure
- Data Breach of Security Procedure
- Data Quality Assurance Process
- Employee Progressive Discipline Procedure
- Privacy Breach Procedure
- Privacy Procedure
- Records Classification and Retention Schedule
- Safe Disclosure Procedure
- Security Classifications Guidelines

F. REVISION HISTORY

Date (mm/dd/yyyy)	Description of Change	Sections	Person who Entered Revision (Position Title)	Person who Authorized Revision (Position Title)
6/4/2026	New policy. Previous Protection of Privacy Policy (2017) will be rescinded. Old 3.52 Confidentiality and Privacy Policy for Employees and Contractors will be rescinded.		Records Management & Information Access Advisor	Vice President, Administration & CFO