



The Town of Rocky Mountain House Privacy Management Program June 2026

EFFECTIVE DATE: JUNE 11, 2026

The *Protection of Privacy Act* ([POPA](#)) requires public bodies in Alberta to have a Privacy Management Program. This program consists of the policies and procedures that outline the Town's privacy practices. Having appropriate policies and procedures in place ensures public bodies are properly equipped to manage and protect personal information as well as meeting our legal responsibilities.

Protection of Privacy Policy

The Town is committed to protecting your personal information. The Town's Protection of Privacy Policy outlines the roles, responsibilities, and practices that guide how The Town collects, manages, uses, and protects personal information, data derived from personal information, and non-personal data.

Requests to Correct Personal Information

If you believe personal information The Town holds about you is incorrect, you can ask for it to be corrected by filling out the appropriate form. The Town has a procedure that explains how these requests are received and reviewed under section 7 of POPA.

Incident Response

The Town has policies and procedures in place to help staff respond to privacy incidents carefully and consistently, as required by section 10(2) of POPA. See page 7 of the Town's Protection of Privacy Policy for further details.

Complaint Response

If you have concerns about how The Town collected, used, or shared your personal information, you can make a complaint to The Town first. This is the first step before asking the Office of the Information and Privacy Commissioner of Alberta (the Commissioner) to review the matter. To make a complaint, please contact the Access and Privacy Officer at accessandprivacy@trmh.ca or by calling the Town office at 403-845-2866.

Your complaint will be acknowledged within two to three business days. We aim to review and respond within 30 business days of receiving your complaint.

If we are unable to resolve your complaint, we will let you know about your right to make a complaint to the Commissioner under section 38 of POPA. You may also ask the Commissioner to review the matter if you believe your personal information was collected, used, or shared in a way that does not follow POPA.

Non-personal Data

The Town has documentation on how employees must create, use, and share non-personal data in line with POPA. We also provide guidance and tools to help staff follow these requirements and use good practices when creating non-personal data.

Automated Systems Using Personal Information

The Town uses automated systems involving personal information in line with POPA. We also have a document that explains the safeguards in place to help protect personal information in these systems.

Information Security Classification System

The Town maintains an information security classification system that applies to all personal information, data derived from personal information, and non-personal data in the custody or under the control of The Town.

Mandatory Employee Training

All Town employees must complete privacy awareness training. This training helps employees understand how to protect personal information and meet their responsibilities under POPA. It covers:

- An overview of POPA and what employees are required to do;
- The rules for collecting, using, sharing, and protecting personal information;
- The right to ask for a correction to personal information;
- How to identify and respond to privacy incidents; and
- The Town's privacy policy and the roles employees play in protecting personal information.

Privacy Management Program Review, Assessment and Update

This Privacy Management Program is reviewed, assessed and updated from time to time but no less than every two years. The Privacy Officer is responsible for this review.

Who is Responsible for Privacy?

We all have an important role in upholding the privacy standards set out in the Protection of Privacy Policy and its accompanying procedures. The Policy outlines the general responsibilities by the different roles to ensure The Town is compliant with POPA.

Privacy Impact Assessment Process

The Town has policies and procedures that explain when a privacy impact assessment is required and how employees must complete one under section 26(1) of POPA.

Proactive Monitoring of Information Systems

The Town proactively monitors information systems that hold personal information, data derived from personal information, and non-personal data. We also have a document that explains these monitoring activities and the safeguards in place to help protect this information. Some technical and security details have been removed, as allowed under section 6(4) of the *Ministerial Regulation*, to help protect the security of the information.

Consent Policies and Procedures

The Town has a procedure that explains how employees must ask for oral, written, or electronic consent before using or sharing personal information, in line with section 2 of the *Protection of Privacy Regulation*.

Artificial Intelligence, Data Derived from Personal Information and Data Matching

The Town has documentation that explains how employees must handle personal information used in artificial intelligence systems, how data derived from personal information may be created, and how non-personal data may be created, in line with POPA.

Written Administrative, Technical and Physical Safeguards

The Town has a procedure that explains the administrative, technical, and physical safeguards in place to help protect personal information, data derived from personal information, and non-personal data. Some technical and security details have been removed, as allowed under section 6(4) of the *Ministerial Regulation*, to help protect the security of the information.

Privacy Officer Designation

The Town has designated the Privacy Officer position to help ensure compliance with POPA.

Position title: Access and Privacy Officer
Department: Legislative Services
Contact: AccessandPrivacy@trmh.ca

The Privacy Officer is responsible for:

- Overseeing and coordinating The Town's compliance with POPA and this Privacy Management Program;
- Providing advice to departments about privacy responsibilities, policies, and procedures;
- Reviewing and approving privacy impact assessments;
- Managing the privacy incident response process;
- Overseeing mandatory privacy awareness training;
- Acting as the main contact with the Privacy Commissioner; and
- Maintaining and regularly reviewing this Privacy Management Program.

Public Availability of the Privacy Management Program

The Town makes this Privacy Management Program available to the public, as required by the *Ministerial Regulation*.