



**SAITSA Personal Information Collection, Use,
Disclosure, and Retention Policy**

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Policy	Section	Policy #	Approved by	Approval Date
Personal Information Collection, Use, Disclosure, and Retention Policy			Marc Stromme	June 22 nd , 2022
			Revision Date	
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Preamble

Saitsa is committed to complying with applicable legislation and protecting the privacy of its personnel, members, and those with whom it interacts.

Policy Scope

This policy applies to all collection, use, retention, disclosure, and destruction of all personal information by Saitsa.

This policy applies to all Saitsa employees, managers, directors, and volunteers.

Purpose

Saitsa collects personal information about its members and other individuals in order to administer programs and services. The purpose of this policy is to address how that information is collected, used, stored, distributed, and retained.

Definitions

In this policy the following definitions shall apply:

- **“personal information”** means information about an identifiable individual and includes personal employee information as defined in PIPA, but does not include information of an aggregate or anonymous nature where a specific individual or individuals cannot be identified and does not include business contact information;
- **“PIPA”** means the *Personal Information Protection Act*, SA 2003 c P-6.5, as amended or replaced from time to time; and
- **“SAITSA personnel”** means Saitsa’s employees, volunteers, contractors, managers and directors.

Applicable Laws

If this policy conflicts with any legislation or lawful order by which Saitsa is bound, the legislation or lawful order shall prevail.

1. Personal Information Collection & Use

1.1 Collection

Saitsa will only collect personal information:

- a) As authorized by law; or
- b) With the consent of the person to whom the information relates.

Saitsa will always disclose, prior to or at the time of collection, the purpose for which personal information is collected.

1.2 Information Use

Saitsa will only use personal information which it has collected:

- c) As authorized by law;
- d) For the purpose for which it was collected; or
- e) With the consent of the person to whom the information relates.

1.3 Disclosure

Saitsa will only disclose personal information which it has collected:

- f) As authorized by law;
- g) To the extent that such disclosure is necessary to achieve the purpose for which it was collected; or
- h) With the consent of the person to whom the information relates.

1.4 Sale of Personal Information

Saitsa will not sell any personal information which it has collected to any external entity, including the Southern Alberta Institute of Technology (SAIT) except with the consent of the person to whom the information relates.

2. Information Security

2.1 Information Retention and Destruction

Saitsa will retain personal information it has collected for as long as is reasonable for legal or business purposes. At the end of this period, the personal information will either be destroyed in a secure manner or made anonymous so that it can no longer be used to identify an individual.

2.2 Security

Personal information in Saitsa's possession shall be stored securely, including:

- a) Electronic files containing personal information shall be stored in the appropriate folder and shall not be stored on any personal drives;
- b) Access to electronic files containing personal information shall be restricted to those personnel who are authorized to view or use such information;

- c) Hard copies of files containing personal information shall be stored securely and shall not be removed from Saitsa's offices except with the authorization of the Manager, Staff Experience, the Manager, Assets & Payroll Administration, or the Executive Director;
- d) If any third party may have access to personal information while providing services to Saitsa, such as a printer, mailing house, or website administrator, Saitsa shall ensure that such party signs a confidentiality agreement prior to such access;
- e) Where applicable, when sending packages containing personal information a traceable shipping method shall be used;
- f) Saitsa will not engage any service providers outside Canada to collect, use, disclose or store personal information on its behalf unless a written procedure is adopted which specifies the country where this work is occurring and the purpose for which the service provider has been authorized to manage personal information; and
- g) All computers and mobile devices with access to personal information collected by Saitsa are required to have password protection and up-to-date virus protection or encryption, as applicable.

3. Data Breach Protocol

3.1 Notice

If an incident occurs involving the loss of, unauthorized access to, or disclosure of personal information under Saitsa's control and such incident would reasonably be considered to pose a real risk of significant harm to an individual, Saitsa will, without unreasonable delay, notify the Office of the Information and Privacy Commissioner for Alberta (OIPC). Saitsa will notify all individuals directed to be notified by the OIPC and may also elect to immediately notify affected individuals if it considers it reasonable to do so in the circumstances.

3.2 Consent

If personal information has been collected on the basis of consent and that consent is withdrawn or varied, Saitsa will notify the individual of any consequences of such withdrawal to the extent they are not reasonably obvious. Saitsa will then discontinue using, collecting, or disclosing the personal information, except to the extent that:

- a) the collection, use, or disclosure of such information is authorized by law; or
- b) the collection, use, or disclosure of the information would frustrate the performance of any legal obligation of Saitsa.

4. Information Oversight

4.1 Saitsa Personnel

No Saitsa personnel shall collect, use or disclose or attempt to collect, use or disclose any personal information on behalf of Saitsa except in accordance with the terms of this policy.

All Saitsa personnel shall comply with the terms of this policy and with any procedures established by Saitsa from time to time for the protection and management of personal information. Any

breach of this policy may result in disciplinary action in accordance with Saitsa's Human Resources Policy or any other applicable policy or code of conduct of Saitsa from time to time.

4.2 Administration

The Executive Director is responsible for:

- a) Ensuring that Saitsa complies with PIPA; and
- b) Administering this policy.

The Executive Director may delegate these duties to other Saitsa personnel from time to time.

4.3 Access Requests, Correction Requests, and Complaints

Any requests to access or correct personal information or complaints regarding Saitsa's management of personal information shall be handled in accordance with Saitsa's Personal Information Access Request, Correction Request, and Complaint Procedure.