

Saitsa*

**SAIT Students'
Association**

**Personal Information Access Request, Correction
Request, and Complaint Procedure**

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Procedure	Section	Policy #	Approved by	Approval Date
Personal Information Access Request, Correction Request, and Complaint Procedure			Marc Stromme	June 22 nd , 2022
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Purpose

Saitsa is required to comply with PIPA in its management of personal information and has a Personal Information Collection, Use, Disclosure, and Retention Policy for that purpose. From time to time there may be requests to access or correct personal information in Saitsa's possession or complaints regarding Saitsa's management of personal information and this procedure sets out the way such matters will be managed.

Definitions

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

1. Access to Information

1.1 Access Requests

Individuals may request that Saitsa provide them with:

- a) access to or copies of their own personal information in Saitsa's possession;
- b) information about the use or disclosure of their personal information by Saitsa.

Saitsa will reasonably provide such access or information upon receipt of such requests.

Saitsa will not disclose personal information about an individual to any other person except in accordance with PIPA and its Personal Information Collection, Use, Disclosure, and Retention Policy.

1.2 Fees

Saitsa may charge reasonable fees for access requests. If Saitsa is going to charge a fee for an access request, prior to commencing the response Saitsa will:

- a) notify the person making the request of the estimated fee; and
- b) require the person making the request to provide a deposit of 50% of the estimated fee.

Saitsa will not charge fees for requests by Saitsa employees to access their own personal employee information as defined in PIPA.

2. Information Correction

2.1 Correction Requests

An individual may request that Saitsa correct an error or omission in their personal information that is in Saitsa's possession. Upon receiving such a request, Saitsa will determine whether to make a correction.

If Saitsa agrees to correct the error or omission, Saitsa will do so as soon as possible, and will notify any third parties to whom it has disclosed the personal information of the correction.

If Saitsa does not agree to correct the error or omission, Saitsa will annotate the personal information in its possession with information about the correction which was requested.

Saitsa will notify the individual making the request of the action taken, the name of a person who can answer questions about the action taken, and the individual's ability to ask for a review of the decision by the Office of the Information and Privacy Commissioner (OIPC).

Saitsa will not correct or otherwise alter opinions contained within its records, including professional opinions.

2.2 Response Times

Saitsa will respond to most access or correction requests within 45 days of receipt. If Saitsa is unable to respond within that time because:

- a) the person making the request has provided insufficient detail;
- b) a large amount of personal information is requested or must be searched;
- c) meeting that timeframe would unreasonably interfere with Saitsa's other operations; or
- d) Saitsa needs time to consult with another organization,

Saitsa may extend this time period by a further 30 days on notice to the person making the request, in which event Saitsa will specify the reason for the extension.

3. Data Breaches

3.1 Breaches and Complaints

Saitsa personnel are required to notify either their manager or Saitsa's Executive Director of any breaches of PIPA or Saitsa's Personal Information Collection, Use, Disclosure, and Retention Policy by Saitsa or any Saitsa personnel. Other individuals, including members of Saitsa and members of the public, are encouraged to report any breaches or complaints regarding Saitsa's management of personal information to Saitsa. Complaints should be in writing and should contain as much information as is reasonably possible.

Saitsa will investigate any complaints or notices of breaches and will determine:

- a) whether there has been a breach and, if so, what steps are required to respond to such breach including notice to the Office of the Information and Privacy Commissioner or to affected individuals;
- b) whether any changes to Saitsa's processes are required; and
- c) whether any other steps are required such as additional training or disciplinary action in respect of any Saitsa personnel.

Saitsa's Executive Director or their delegate is responsible for investigating any complaints or notices of breaches, unless an allegation is against the Executive Director themselves, in which event the investigation will be conducted by Saitsa's Board of Directors or their delegate.

Complaints can also be directed to the Office of the Information and Privacy Commissioner (OIPC). More information about the OIPC is available at www.oipc.ab.ca.

3.2 Contact Information

All requests, complains and other communications under this procedure may be sent to Saitsa at:

Saitsa
MC107 Stan Grad
1301 – 16 Ave NW, Calgary, AB T2M 0L4
Attention: Executive Director
Email [Insert]