



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

**Updated: June 2024**

Subject	Approved by	Approved Date	Revision Date
Personal Information Collection, Use, Disclosure, and Retention Policy	CEO	June 2022	June 2024

## **Policy Statement**

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

## **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.

## **Personal Information Collection & Use**

### **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.

### **2. Use**

Saitsa will only use personal information which it has collected:

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

### **3. Disclosure**

Saitsa will only disclose personal information which it has collected:

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

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.

### **4. 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.

### **5. Security**

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

- Electronic files containing personal information shall be stored in the appropriate folder and shall not be stored on any personal drives;
- Access to electronic files containing personal information shall be restricted to those personnel who are authorized to view or use such information;
- 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 Chief Executive Officer;
- 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;
- Where applicable, when sending packages containing personal information a traceable shipping method shall be used;
- Saitsa will not engage any service providers outside Canada to collect, use, disclose or store personal information on its behalf unless notice is given to the affected individual and 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
- 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.

## **Data Breach Protocol**

### **5. 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.

### **6. 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:

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

## **Information Oversight**

### **7. 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 Manual or any other applicable policy Saitsa from time to time.

### **8. Administration**

The Chief Executive Officer or designate is responsible for:

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

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

### **9. 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.