



## **PRIVACY MANAGEMENT PROGRAM:**

- General Program Policy
- **PRIVACY POLICY**
- Access Policy
- Security Policy

DRAFT DATE: July 13<sup>th</sup> 2026

APPROVED: BK

*Donna M. Collins*

## Table of Contents

### **PRIVACY POLICY: COLLECTION, USE, DISCLOSURE, DATA MATCHING, NON-PERSONAL DATA**

|                                  |    |
|----------------------------------|----|
| A. PURPOSE .....                 | 3  |
| B. SCOPE .....                   | 3  |
| C. POLICY .....                  | 3  |
| D. PROCESSES .....               | 8  |
| E. ARTIFICIAL INTELLIGENCE ..... | 10 |

### **APPENDIX 1: UNREASONABLE INVASION OF PRIVACY GUIDELINES ..... 13**

## **TOWN OF TROCHU – POLICY**

**POLICY # 2026-07-13-02**

**POLICY NAME: Trochu Privacy Management Program: Privacy Policy  
Collection, Use, Disclosure, Data Matching and Non-Personal Data**

### **I. PURPOSE**

The Town of Trochu ("Trochu") is bound by the requirements of the *Protection of Privacy Act* ("POPA") and collects, uses, and discloses personal information in accordance with its provisions. This policy establishes the principles and processes for the collection, use and disclosure of personal information, data matching and non-personal data.

This document should be read in conjunction with Trochu Privacy Management Program: General Program Policy and all the related policies and procedures referenced therein.

### **II. SCOPE**

This policy applies to:

1. Trochu employees, including directors, officers, contractors, students, and volunteers providing services on behalf of Trochu;
2. All recorded information, in whatever form or medium (paper, digital, audio-visual, graphic) created or received in the course of carrying out Trochu's mandated functions and activities; and
3. All facilities and equipment required to collect, manipulate, transport, transmit, or keep Trochu information.

### **III. POLICY**

#### **A. COLLECTION OF PERSONAL INFORMATION**

1. Trochu collects personal information only if:
  - a. the collection is expressly authorized by legislation;
  - b. the information is collected for the purposes of law enforcement; or
  - c. the information relates directly to and is necessary for an operating program or activity of Trochu, including a common or integrated program.

2. Trochu collects personal information directly from the individual, or their authorized representative. Trochu only collects personal information indirectly from another source in the following circumstances:
  - a. the indirect collection is authorized by the individual, other legislation, or the Alberta Information and Privacy Commissioner;
  - b. the personal information may be disclosed to Trochu under the disclosure provisions outlined below;
  - a. the personal information is collected in a health and safety emergency, and the individual is unable to provide the information;
  - b. direct collection could reasonably be expected to endanger the mental or physical health or safety of the individual or of any other person;
  - c. the personal information is about a designated emergency contact;
  - d. the personal information is required to determine suitability for an honour or award;
  - e. the personal information is collected from public sources for fund-raising;
  - f. the personal information is required for a law enforcement purpose;
  - g. the personal information is required to collect a fine or debt owed to Trochu, or for use in the provision of legal services to Trochu;
  - h. the personal information concerns the history, release, or supervision of an individual under the supervision of a correctional authority;
  - i. the personal information is required to inform the Public Trustee or Public Guardian about clients or potential clients;
  - j. the personal information is required for enforcing an order under the Maintenance Enforcement Act;
  - k. the personal information is required to manage or administer Trochu personnel;
  - l. the personal information is required to support researching or validating claims, disputes, or grievances of aboriginal people;
  - m. the personal information is required to plan, manage, deliver, monitor and evaluate a common or integrated program or service.
2. When collecting personal information directly from an individual, Trochu informs the individual of the purpose for which the information is collected, the legal authority for the collection, any intention to input the information into an AI service, and contact information of the individual who can answer questions about the collection.
3. Notifications are included on the medium or at the location of collection (websites, forms, pamphlets, posters). Notice is not required in circumstances when personal information is collected indirectly, for authorized purposes.
4. Trochu employees collect only the amount and types of personal information as required to complete the stated function or purpose.

## **B. CONSISTENT PURPOSES**

1. Trochu will primarily use and disclose personal information for the purpose for which it was originally collected or for a consistent purpose.
2. For a use or disclosure to be for a consistent purpose, Trochu must determine that the proposed use or disclosure is:
  - a. Directly connected to the original purpose for collection; and
  - b. Necessary for operating a program or common or integrated program or service of Trochu.
3. In assessing the consistent purpose, Trochu must consider:
  - a. The nature of the original purpose documented at the time of collection;
  - b. Whether the new use or disclosure is a logical extension of that purpose;
  - c. The expected impact on the individual's privacy.

## **C. USE OF PERSONAL INFORMATION**

1. Trochu may use personal information under the following circumstances:
  - a. for the purposes for which it was originally collected or for a use consistent with that purpose;
  - b. with the consent of the individual, when obtained in accordance with consent standards; or
  - c. for a purpose for which the information is disclosed to Trochu by another public body, under the allowable disclosure provisions.
2. Trochu employees use only the amount and types of personal information as required to complete the state function or purpose.

## **D. DISCLOSURE OF PERSONAL INFORMATION**

1. Trochu may disclose personal information for the purpose for which the information was collected or compiled or for a purpose consistent with that purpose;
2. Trochu may disclose personal information for an inconsistent purpose only in the following circumstances:
  - a. **INDIVIDUAL OR PUBLIC INTERESTS**
    - i. with the consent of the individual, when obtained in accordance with consent standards;
    - ii. to avert or minimize a risk of imminent harm and danger to the health and safety of any person;

- iii. so that the spouse or adult interdependent partner, relative or friend of an injured or deceased individual may be contacted, or to a relative of a deceased individual;
- iv. personal information of a minor or parent or guardian of a minor, to a law enforcement agency or to another organization or public body providing services to the minor, if it is clearly in the best interest of the minor;
- v. if disclosure is not an unreasonable invasion of privacy (Appendix 1);

**b. LEGAL OR ENFORCEMENT REQUIREMENTS**

- i. to comply with, or in accordance with, an enactment of Alberta or Canada;
- ii. in response to a subpoena, warrant or court order;
- iii. for law enforcement purposes;
- iv. for the supervision of an individual by a correctional authority, or to a lawyer or student-at-law acting for an inmate;
- v. to comply with the Maintenance Enforcement Act, or to the Administrator of the Motor Vehicle Accident Claims Act;
- vi. to an Officer of the Legislature if required for their duties;

**c. OPERATIONAL REQUIREMENTS**

- i. to an officer or employee of Trochu if necessary for their duties;
- ii. to an officer or employee another public body if necessary for planning, managing, delivering, monitoring or evaluating a common or integrated program or service;
- iii. to enforce a legal right, or to collect a fine or to make a payment, or for court and quasi-judicial proceedings;
- iv. to verify an individual's suitability or eligibility for a program or benefit;
- v. to comply with the public interest disclosure provisions;
- vi. to the Auditor General or any other prescribed person for audit purposes;
- vii. to another public body for the authorized purposes of data matching;

**d. HUMAN RESOURCES**

- i. to a union representative, with the consent of the individual;
- ii. for the management of personnel;

**e. PUBLIC DISSEMINATION AND RESEARCH**

- i. to the Provincial Archives of Alberta or to Trochu archives or another public body archives for archival preservation purposes;
- ii. for research or statistical purposes, under agreement;
- iii. when the information is available to the public.

3. Trochu employees disclose only the amount and types of personal information as required to perform their assigned duties.
4. If there is no authority for the disclosure, the information cannot be disclosed. If The individual making the request for information wishes, they may make a formal ATIA Request.
5. Trochu will not sell personal information under its custody or control in any circumstance or for any purpose.

#### **E. RESEARCH DISCLOSURE**

1. Personal information may be disclosed for statistical or research purposes, only if:
  - a. research cannot reasonably be accomplished in a non-identifiable form or is approved by the OIPC;
  - b. data matching resulting from the disclosure is not harmful to the individuals the information is about and the benefits are clearly in the public interest;
  - c. Trochu has approved conditions relating to security and confidentiality, removal or destruction of individual identifiers, and prohibition of any subsequent use or disclosure without authorization; and
  - d. all of the conditions are set out in a written research proposal and agreement

#### **F. DATA MATCHING AND NON-PERSONAL DATA**

1. Trochu data matches personal information between two or more information sources to create new data derived from personal information and creates non-personal data from identifiable personal information only for the purposes of:
  - a. research and analysis; or
  - b. planning, managing, delivering, monitoring or evaluating a program or service.
2. For the purposes of data matching, Trochu:
  - a. does not collect personal information directly from the individual;
  - b. may collect personal information from another public body;
  - c. may use personal information under its custody and control.
3. Trochu implements human oversight, auditing and validation measures for systems used for creating data derived from personal information or non-personal data to ensure the accuracy and reliability of the data.
4. Trochu retains and uses data derived from personal information only for the purpose for which it was created and as long is reasonably necessary to enable Trochu to carry out that purpose.

5. Trochu discloses data derived from personal information only
  - a. to the other public body from which data matched personal information was collected, for the purpose it was created;
  - b. to the Office of Statistics and information for the purposes of The Office of Statistics and Information Act.
6. Trochu uses non-personal data for any purpose and discloses non-personal data to anyone other than another public body only under agreement containing the required conditions, including prohibiting re-identification of individuals.
7. Trochu is not restricted from disclosing reports, summaries or other publications containing non-personal data that is aggregate or statistical form.

## **IV. PROCESSES**

### **A. CONSENT STANDARDS**

1. Trochu can only request the consent of the individual for the indirect collection, use or disclosure of their personal information, not for direct collection.
2. Individual consents for use or disclosure of personal information must include:
  - a. the identity of the individual or authorized representative providing the consent;
  - b. the purpose for which the information is being disclosed and how it can be used;
  - c. the personal information to which the consent relates;
  - d. the identity of the third party to whom the information will be disclosed;
  - e. an acknowledgement that the individual providing the consent has been made aware of the reasons why the information is needed and the risks and benefits to the individual of consenting or refusing to consent;
  - f. the date the consent is effective and the date, if any, on which the consent expires;
  - g. a statement that the consent may be revoked any time by the individual providing it;
  - h. an attestation affirming the consent or revocation by the individual or authorized representative.
3. A consent or revocation of consent is authenticated by the signature of the individual providing consent. Signatures are in writing either manually or electronically.
4. Electronic signatures are considered valid only if the level of electronic authentication is sufficient to confirm the identity of the individual who is granting or revoking consent.
5. Oral consent is not routinely accepted by Trochu. Should oral consent be implemented, Trochu will ensure the consent adheres to the requirements of the POPA Regulation, including a recording of the consent.

## **B. RESEARCH PROJECT AGREEMENTS**

1. Researchers are required to submit a Research Proposal for consideration and approval by the PAO.
2. Trochu discloses personal information for research purposes only if the recipient signs an agreement.

## **C. NON-PERSONAL DATA BEST PRACTICES AND REQUIREMENTS**

1. Trochu develops and implements standards and techniques:
  - a. to locate and remove direct and indirect identifiers in personal information to create non-personal data; and
  - b. to ensure to a reasonable standard that individuals cannot be re-identified within the non-personal data by unauthorized users.
2. When creating non-personal data, and before it is used or disclosed, Trochu:
  - a. verifies the effectiveness of methods used;
  - b. ensures that methods used can be replicated for audit purposes;
  - c. identifies the occurrence and source of potential bias in the data; and
  - d. ensures accuracy and completeness of data if it is used to inform decisions about programs or services.
3. Trochu assesses and records the risk and mitigations of risks of its de-identification standards and techniques resulting in re-identification. As part of this assessment Trochu considers whether:
  - a. the non-personal data can be matched with other public or internal datasets or sources;
  - b. the number of de-identified individuals in an aggregate or cell associated with specific attributes is too small;
  - c. there are too many other attributes associated with the de-identified individual;
  - d. geolocation data (place and time) are included as attributes associated with the de-identified individual.
4. Whenever non-personal data is created from personal information under its custody or control, and before it is used, Trochu records and maintains in a register:
  - a. a description of the personal information or data derived from personal information used to create the non-personal data;
  - b. the purpose for creating the non-personal data;
  - c. the method used for creating the non-personal data;
  - d. the security classification of the data; and
  - e. the assessment completed to ensure that the identity of the individual who is the subject of the non-personal data cannot be identified or re-identified from the data.

## **V. ARTIFICIAL INTELLIGENCE**

### **A. COLLECTION, USE AND DISCLOSURE**

1. When Trochu makes use of generative artificial intelligence applications and processes (AI services), personal information is only collected, used, and disclosed in compliance with legislation and policy. The personal information activities may include:
  - a. **INDIRECT COLLECTION**
    - i. Accessing and compiling personal information from external networked sources or external datasets in response to prompts, either directly or through large language models (LLMs).
    - ii. Creation or generation of new personal information as inferences by AI services as a response to user prompts.
  - b. **DIRECT COLLECTION**
    - i. Collecting information from individuals in conversations or engagements through an AI chatbot service.
  - c. **USE**
    - i. Accessing and compiling personal information from internal sources and datasets in response to prompts, either directly or through LLMs.
    - ii. Use of prompts, internal information and datasets, and generated inferences containing personal information to train internal large language models (LLMs).
  - d. **DISCLOSURE**
    - i. Disclosure of prompts and generated inferences containing personal information to external parties.
    - ii. Trochu considers information about individuals extracted by an AI service from external networked sources, including the internet, as personal information.
    - iii. Trochu only uses AI services that do not disclose internally generated personal information in prompts or internal information sources to an external LLM for AI training purposes.
    - iv. Trochu considers inferences generated by an AI service containing personal information as data derived from personal information.

### **B. INFORMATION ACCURACY AND INTEGRITY**

1. Trochu does not use or distribute inferences generated by AI services about or affecting individuals before they are reviewed for accuracy and integrity and verified by competent and qualified employees.
2. Inferences generated by AI services for Trochu use include citations and references to sources detailed enough to verify the veracity and completeness of the information.

### **C. NOTIFICATION**

1. Trochu notifies individuals that AI Services have and are being used to:
  - a. Collect personal information in conversations or direct engagements with individuals; or
  - b. Generate information or knowledge that contributes to decision-making about the individual.
2. Notifications contain all the elements of a collection notice with the addition of a statement that information or knowledge from AI services has contributed to decision-making about the individual.
3. Upon request, Trochu provides:
  - a. the name and description of the AI services used; and
  - b. citations of the sources used by the AI Services to generate inferences that contributed to decision-making about the individual.
4. This notification may not be provided in cases where one of the circumstances or conditions which require or allow Trochu to withhold the information apply.

### **D. REGULATION OF USE**

1. Trochu regulates the use of AI for specified purposes based on the risk to individuals.
2. Trochu considers the following activities using AI services as high-risk:
  - a. Health assessment and diagnosis;
  - b. Human resource performance evaluation and recruitment;
  - c. Safety components and controls for critical equipment and infrastructure;
  - d. Assessment of individuals requesting access to essential human services;
  - e. Predictive profiling;
  - f. Biometrics-based recognition and identification, including images.
3. Trochu employees complete high-risk AI activities only with the approval of the PAO, who evaluates the risk on a case-by-case basis.
4. All new high-risk AI activities require a Privacy Impact Assessment, which may require an Algorithmic Impact Assessment, before they are initiated.
5. Trochu considers the following activities using AI services as low-risk:
  - a. Content generation and editing;
  - b. Computer and program coding;
  - c. Information indexing and search;
  - d. Spam and malware filtering;

- e. Audit logging and monitoring;
  - f. Recommendations for routine or transactional activities.
6. Trochu employees complete low-risk AI activities as required based on their effectiveness for the purpose.
7. Where practical and effective for purpose, Trochu implements mitigating conditions and activities that mitigate the risks associated with AI services, such as:
- d. limiting an AI service to a small-scale information system and LLM model to support a narrowly defined purpose or function;
  - e. completing pre-implementation testing and monitoring of AI services performance for the identified purpose;
  - f. implementing human oversight to ensure the accuracy and reliability of the AI services;
  - g. continuously monitoring the effectiveness of AI services for the activity.

## Appendix 1: Unreasonable Invasion of Privacy Guidelines

There are several major factors to consider when deciding whether disclosure of personal information to someone who is not the person who is the subject of the information is unreasonable.

### **Step 1: Confirm the personal information**

First, make sure that the information you are reviewing is personal information of a third party according to the personal information definition.

### **Step 2: Not an unreasonable invasion of personal privacy**

Second, determine whether disclosing the personal information is NOT an unreasonable invasion of privacy.

This is the case for the following types of information:

- Business title, address, or telephone number of an individual;
- Opinions contained in work product;
- Trochu employee classification, salary range, responsibilities, discretionary benefits;
- Information released 25 years after the death of the individual;
- Details of a license, permit, discretionary benefit given by Trochu to an individual.
- The following personal information, so long as the individual has not expressly requested otherwise:
  - Enrolment in a school
  - Attendance at public event related to Trochu
  - Receipt of honour or award from Trochu

### **Step 3: Presumed unreasonable invasion of personal privacy**

Third, for all other personal information, determine when disclosure is otherwise presumed to be an unreasonable invasion of privacy, by record types that document information about the individual:

- Medical, psychiatric or psychological records;
- Law enforcement records;
- Income or social assistance eligibility;
- Employment or educational history;
- Personal tax, banking or credit card details;
- Personal/personnel evaluations or recommendations, references;
- Names with other personal information, or on its own if it reveals identifiable personal, information; or
- Racial, ethnic, religious or political details.

**Step 4: Other factors to consider**

Fourth, if it helps to confirm your decision to disclose or not disclose the personal information, take into account the following considerations:

- These factors would weigh in favour of disclosing personal information:
  - advances public scrutiny;
  - promotes public health and safety or the protection of the environment;
  - provides a fair determination of the applicant's rights; or
  - assists in researching or validating claims, disputes or grievances of aboriginal people.
- 2. These would weigh in favour of withholding the personal information:
  - the third party is exposed unfairly to financial or other harm;
  - the personal information was supplied in confidence;
  - the personal information is likely inaccurate or unreliable; or
  - the disclosure would unfairly damage the reputation of any individual.

**Step 5: Disclosure allowance**

Finally, check to determine if POPA allows Trochu to disclose the personal information for the specific allowable circumstances listing in the Disclosure of Personal Information section. If the circumstances are applicable to the case, you may or, in the case of an ATIA access request, you would be required to disclose the personal information.