



COLLECTION, USE, DISCLOSURE, DATA MATCHING AND NON-PERSONAL DATA

COLLECTION OF PERSONAL INFORMATION

1. Holy Spirit Catholic School Division 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 Holy Spirit Catholic School Division, including a common or integrated program.
2. Holy Spirit Catholic School Division collects personal information directly from the individual, or their authorized representative. Holy Spirit Catholic School Division 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 Holy Spirit Catholic School Division under the disclosure provisions outlined below;
 - i. the personal information is collected in a health and safety emergency and the individual is unable to provide the information;
 - ii. direct collection could reasonably be expected to endanger the mental or physical health or safety of the individual or of any other person;
 - iii. the personal information is about a designated emergency contact;
 - iv. the personal information is required to determine suitability for an honour or award;
 - v. the personal information is required to verify the individuals' eligibility for participation in a program or to receive a benefit, product, or service from Holy Spirit Catholic School Division;
 - vi. the personal information is collected from public sources for fund-raising;
 - vii. the personal information is required for a law enforcement purpose;
 - viii. the personal information is required to collect a fine or debt owed to Holy Spirit Catholic School Division, or for use in the provision of legal services to Holy Spirit Catholic School Division;
 - ix. the personal information concerns the history, release, or supervision of an individual under the supervision of a correctional authority;

- x. the personal information is required to inform the Public Trustee or Public Guardian about clients or potential clients;
 - xi. the personal information is required for enforcing an order under the Maintenance Enforcement Act;
 - xii. the personal information is required to manage or administer Holy Spirit Catholic School Division personnel;
 - xiii. the personal information is required to support researching or validating claims, disputes, or grievances of aboriginal people;
 - xiv. the personal information is required to plan, manage, deliver, monitor and evaluate a common or integrated program or service.
3. When collecting personal information directly from an individual, Holy Spirit Catholic School Division 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.
 4. 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.
 5. Holy Spirit Catholic School Division employees collect only the amount and types of personal information as required to complete the stated function or purpose.

CONSISTENT PURPOSES

1. Holy Spirit Catholic School Division 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, Holy Spirit Catholic School Division 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 Holy Spirit Catholic School Division.
3. In assessing the consistent purpose, Holy Spirit Catholic School Division 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.

USE OF PERSONAL INFORMATION

1. Holy Spirit Catholic School Division 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 Holy Spirit Catholic School Division by another public body, under the allowable disclosure provisions.
2. Holy Spirit Catholic School Division employees use only the amount and types of personal information as required to complete the state function or purpose.

DISCLOSURE OF PERSONAL INFORMATION

- 1. Holy Spirit Catholic School Division may disclose personal information for the purpose for which the information was collected or compiled or for a purpose consistent with that purpose;
- 2. Holy Spirit Catholic School Division may disclose personal information for an inconsistent purpose only in the following circumstances:

INDIVIDUAL OR PUBLIC INTERESTS

- a. with the consent of the individual, when obtained in accordance with consent standards;
- b. to avert or minimize a risk of imminent harm and danger to the health and safety of any person;
- c. 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;
- d. 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;
- e. to an MLA to assist the individual;
- f. if disclosure is not an unreasonable invasion of privacy;

LEGAL OR ENFORCEMENT REQUIREMENTS

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

OPERATIONAL REQUIREMENTS

- a. to an officer or employee of Holy Spirit Catholic School Division if necessary for their duties;

- b. to an officer or employee of another public body if necessary for planning, managing, delivering, monitoring or evaluating a common or integrated program or service;
- c. to enforce a legal right, or to collect a fine or to make a payment, or for court and quasi-judicial proceedings;
- d. to verify an individual's suitability or eligibility for a program or benefit;
- e. to comply with the public interest disclosure provisions;
- f. to the Auditor General or any other prescribed person for audit purposes;
- g. to another public body for the authorized purposes of data matching;

HUMAN RESOURCES

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

PUBLIC DISSEMINATION AND RESEARCH

- a. to the Provincial Archives of Alberta or to Holy Spirit Catholic School Division archives or another public body archives for archival preservation purposes;
- b. for research or statistical purposes, under agreement;
- c. when the information is available to the public.
- d. Holy Spirit Catholic School Division employees disclose only the amount and types of personal information as required to perform their assigned duties.
- e. 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.
- f. Holy Spirit Catholic School Division will not sell personal information under its custody or control in any circumstance or for any purpose.

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. Holy Spirit Catholic School Division 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.

DATA MATCHING AND NON-PERSONAL DATA

1. Holy Spirit Catholic School Division
 - a. Data matches personal information between two or more information sources to create new data derived from personal information; and
 - b. creates non-personal data from identifiable personal information;
 - c. only for the purposes of:
 - d. research and analysis; or
 - e. planning, managing, delivering, monitoring or evaluating a program or service.
0. For the purposes of data matching, Holy Spirit Catholic School Division:
 - 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. Holy Spirit Catholic School Division 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. Holy Spirit Catholic School Division 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 Holy Spirit Catholic School Division to carry out that purpose.
5. Holy Spirit Catholic School Division 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. Holy Spirit Catholic School Division 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. Holy Spirit Catholic School Division is not restricted from disclosing reports, summaries or other publications containing non-personal data that is aggregate or statistical form.

Procedure

1. CONSENT STANDARDS

- 1.1 Holy Spirit Catholic School Division can only request the consent of the individual for use or disclosure of their personal information, not for collection.
- 1.2 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; and
 - g. a statement that the consent may be revoked at any time by the individual providing it.
 - h. an attestation affirming the consent or revocation by the individual or authorized representative.
- 1.3 A consent or revocation of consent is authenticated by the signature of the individual providing consent. Signatures are in writing either manually or electronically.
- 1.4 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 the consent.
- 1.5 Oral consent is not routinely accepted by the Holy Spirit Catholic School Division. Should oral consent be implemented, Holy Spirit Catholic School Division will ensure the consent adheres to the requirements of the POPA Regulation

2. RESEARCH PROJECT AGREEMENTS

- 2.1 Researchers are required to submit a Research Proposal for consideration and approval by the PAO.
- 2.2 Holy Spirit Catholic School Division discloses personal information for research purposes only if the recipient signs an agreement.

3. NON-PERSONAL DATA BEST PRACTICES AND REQUIREMENTS

- 3.1 Holy Spirit Catholic School Division 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.