

PERSONAL INFORMATION – GENERAL GUIDELINES

Section:	Administration (AD)
Subject:	Organization of the Institution
Legislation:	<i>Freedom of Information and Protection of Privacy Act (RSA 2000 cF-25); Freedom of Information and Protection of Privacy Regulation AR186/2008.</i>
Effective:	December 8, 2006
Revision:	September 1, 2016 (reformatted); April 10, 2024

APPROVED: _____
President and CEO

POLICY

The policy of the Board of Governors is to comply with the *Freedom of Information and Protection of Privacy Act*.

PROCEDURE

DEFINITIONS

- Personal information** Recorded information about an identifiable individual and includes, but is not limited to, name, residential address and phone number, personal email address, sex (sex assigned at birth), gender identity, title, pronouns, sexual orientation, religious affiliation, Indigeneity, ethnicity, disability status, languages spoken, immigration status, identification number, education and employment history, health information including documentation of approved accommodations for physical or mental disability, an individual’s personal views or opinions and information about an individual’s financial matters.

- Personal information bank** A collection of personal information that is organized or retrievable by the name of an individual or by an identifying number, symbol or other particular assigned to an individual.

- Privacy impact assessment** A document used for information systems, administrative practices and policy proposals that helps to identify and address potential privacy risks that relate to the collection,

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use or disclosure of individually identifying personal or health information.

GOVERNING PRINCIPLES

1. This procedure applies to all recorded personal information that is necessary for the operating program or activity, regardless of medium or format, within the custody or under the control of SAIT.
2. All employees, regardless of work location, are responsible for protecting the privacy of personal information and confidential records by familiarizing themselves and complying with procedure [AD.1.1 Privacy](#) and its associated procedures.

PROCEDURE

A. General Guidelines

1. SAIT recognizes there are many different types of personally identifiable information (PII) and personal data that may be commonly referred to as personal information.
2. Individuals have a right to openly express their authentic selves while enjoying the right to privacy and confidentiality regarding sensitive personal information such as sexual orientation, gender identity and/or gender expression; disclosure of personal information is not permitted to others unless the individual has provided consent.

B. Collection of Personal Information

1. Collection of personal information shall satisfy the requirements of the *FOIP Act* and shall be limited to collection that is necessary for the operating program or activity of SAIT, the collection of information is authorized by an enactment under Alberta or Canada, or as otherwise prescribed by the *FOIP Act*.
 - a) When collecting personal information from an individual, the collection notice (FOIP Notification Statement) must inform the individual of the purpose of collection, the legal authority for the collection, and the contact information of a SAIT representative who can answer questions about the collection, use and disclosure of personal information; and

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- b) All information will be collected directly from the individual except as otherwise authorized by the *FOIP Act*.
- 2. Each school/department that collects personal information, in consultation with FOIP Coordinator, will review if there is a requirement to create or update a personal information bank (PIB) in their area of responsibility that aligns with the requirements of this procedure. The Data Governance Office is responsible for managing SAIT's Personal Information Bank Directory (refer to procedure [AD.3.3.1 Data Governance](#)).

C. Use and Disclosure of Personal Information

- 1. All use and disclosure of personal information shall satisfy the requirements of the *FOIP Act* and must comply with the following:
 - a) All use will be consistent with the stated purpose of collection or with consent of the individual;
 - b) Disclosure shall be controlled and limited in accordance with the *FOIP Act*; and
 - c) Personal information should only be used and/or disclosed within SAIT to those authorized and who need the information to carry out their duties or functions.

D. Protection of Personal Information

- 1. SAIT is committed to safeguarding personal information in its custody or control by taking all reasonable precautions and security measures to mitigate against such risks such as unauthorized access, disclosure, disposal or destruction;
- 2. If an employee becomes aware of unauthorized access to or unauthorized collection, use, disclosure or disposal of personal information, they must immediately inform the FOIP Coordinator and their supervisor; and
- 3. SAIT will perform a privacy impact assessment (PIA) related to third-party handling of protected health information (refer to procedure [AD.2.10.2 Technology Vendor Risk Assessment](#)) and may conduct a PIA when evaluating a new system/application or planning major changes to an existing system/application.

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PROCEEDURE

E. Right of Access and Correction of Personal Information

1. An individual has a right to access their own personal information, subject to the exceptions under the *FOIP Act* (refer to procedure [AD.1.1.4 Formal Access to Information](#)).
2. Reasonable efforts will be made to ensure that the personal information contained in records is accurate and complete. Individuals have a right to request a correction to their own personal information.

F. Retention and Disposal of Personal Information

1. Personal information that is used by SAIT to make a decision about an individual will be retained in accordance with the *FOIP Act* for a minimum period of one year from the date of the decision being made about the individual.
2. Records containing personal information will be retained in accordance with SAIT's Classification Scheme and Records Retention Schedule (refer to procedure [AD.3.2.3 Retention and Disposition Schedule](#)).

G. Non-compliance

1. Failure to comply may result in disciplinary hearings under procedure [HR.4.4.1 Corrective Action Procedures](#).

POLICY/PROCEDURE REFERENCE

AD.1.1	Privacy policy
AD.1.1.2	Confidentiality of Student Information procedure
AD.1.1.3	Confidentiality of Employee Information procedure
AD.1.1.4	Formal Access to Information procedure
AD.1.1.5	Privacy Complaints procedure

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