POLICY TITLE	Privacy Policy		
POLICY TYPE	**ADMINISTRATIVE**		
Replaces (if applicable)	N/A		
Approving Department	CAO	**Department Responsible**	Corporate Services
Effective Date	April 15, 2025		
Last Update/Review	New	**Next Review**	April 2026
Supporting Documents	*Bylaw No. 1501, 2025 Town of Golden Freedom of Information and Protection of Privacy* *Bylaw No. 1462, 2021 Town of Golden Administrative Fees and Information Access* *Freedom of Information and Protection of Privacy Act (RSBC 1996, c. 165)* *Town of Golden Privacy Breach Procedure* *Town of Golden Privacy Complaint Procedure* *Town of Golden Privacy Correction of Personal Information Form Procedure* *Town of Golden Privacy Impact Assessment Procedure and Template* *Town of Golden Information Sharing Agreement Procedure and Template* *Town of Golden Mail Opening Policy* *Town of Golden Cyber Incident Response Plan* *Records Management Policies and Procedures*		

1. PURPOSE

This policy is intended to describe how the Town of Golden collects, uses, discloses and protects personal information. This policy provides a framework for how the Town will ensure personal information is managed in accordance with the *Freedom of Information and Protection of Privacy Act.*

2. SCOPE

This policy applies to personal information that the Town collects, uses or discloses in any form (including verbal, electronic or written personal information). This policy does not apply to any collection, use or disclosure of personal information through the Town's website. The Town's website privacy policy can be accessed through this link: www.golden.ca/privacy-policy

3. BACKGROUND

This policy is established in accordance with *"Bylaw No. 1501 Town of Golden Freedom of Information and Protection of Privacy Act Bylaw"*. This policy is the foundation for the Town's privacy management program. It sets the framework for privacy to be a central component of our business practices and a built-in component of our day-to-day operations.

4. DEFINITIONS

In this Policy:

"Act" means the *Freedom of Information and Protection of Privacy Act [RSBC, 1996]*.

"Council" means the Council of the Town of Golden.

"Coordinator" means the person designated as the Information and Privacy Coordinator in section 3(2) of *Bylaw No. 1501, 2025 Town of Golden Freedom of Information and Protection of Privacy*.

"Employee" means an employee of the Town of Golden.

"Head" means the person designated as the Head in section 3(1) of *Bylaw No. 1501, 2025 Town of Golden Freedom of Information and Protection of Privacy*.

"Personal Information" means recorded information about an identifiable individual (but does not include information to enable an individual at a place of business to be contacted, such as the name, position name or title, business telephone number, business address, business email or business fax number of the individual).

"Service Provider" means a person, an organization or company retained under a contract to perform services for the Town.

"Town" means the Town of Golden.

"Us" refers to the Town, as do "our", "we" and similar terms.

"You" refers to anyone whose personal information we collect, use or disclose.

5. COLLECTION OF PERSONAL INFORMATION

5.1 We collect personal information:

a. where collection is authorized under a statute, such as the *Community Charter* and the *Local Government Act*, or is authorized under Town bylaws;

b. for the purposes of our activities, services and programs;

c. for the purposes of planning or evaluating our activities, services and programs;

d. for law enforcement purposes, including enforcing our bylaws; and

e. at presentations, ceremonies, performances, or similar events, that are open to the public and where you voluntarily appear, such as public meetings and public hearings.

5.2 We collect your personal information directly from you, but we may also collect it from another source if you have consented to our doing so. We may also collect your personal information from another source as permitted under the *Act*, including in these cases:

a. where another law allows us to do so;

b. for law enforcement, for a court proceeding, to collect a debt or fine from you, or to make a payment to you;

c. where your personal information is necessary for us to deliver, or evaluate, a common or integrated program or activity;

d. where your personal information is necessary to establish, manage or terminate an employment relationship between you and us;

e. if your personal information may be disclosed to the Town under Part 3 of the *Act*; or

f. where we collect your personal information for the purpose of determining your suitability for an honour or award.

6. USE AND DISCLOSURE OF PERSONAL INFORMATION

6.1 We will use and disclose your personal information only for the purpose we collected it for. We may also use or disclose your personal information for another purpose if you have identified the information and consented to our other use. Lastly, we may use your personal information for a purpose for which it can be disclosed to us under Part 3 of the *Act.*

6.2 We may also disclose your personal information:

a. if you have identified the information and consented in writing to its disclosure;

b. to our employees or service providers if the information is necessary for their duties, for delivery of a common or integrated program, services or activity, or for planning or evaluating a Town program, service or activity;

c. if your personal information is made publicly available in British Columbia by a law that authorizes or requires it to be made public;

d. to a public body or law enforcement agency to assist in a specific investigation or law enforcement proceeding;

e. to your union representative who is making an inquiry, if you have given the representative written authority to make the inquiry or it is otherwise authorized;

f. to our legal counsel for the purpose of legal advice or for use in legal proceedings involving us;

g. to your Member of the Legislative Assembly if you have asked her or him to help resolve a problem; or

h. as otherwise permitted or required under Part 3 of the *Act.*

6.3 Please note that all information provided at open meetings of Council or its committees is considered to be public. If you provide or disclose your personal information to us for that purpose, you are consenting to that information being available to the public, including through posting on our website, webcasting or video recording. This information is considered to be a part of the public record and cannot be removed or changed. However, if you satisfy us in advance that you have legitimate personal safety concerns for yourself or an immediate family member, we may allow you to submit your personal information to Council or a committee in confidence. We will not make it publicly available in that case, although we will keep it in our Corporate Services office, as part of the record.

7. ACCURACY OF PERSONAL INFORMATION

7.1 We make every reasonable effort to ensure that personal information we use for decision making directly affecting you is accurate and complete.

8. ACCESS TO PERSONAL INFORMATION

8.1 You can ask us to give you a copy of your personal information that is in our custody or control by contacting the Corporate Services department. If you are an employee and would like a copy of your own employee personal information, you will need to contact Human Resources through the Chief Administrative Officer.

8.2 If we believe your request may involve someone else's personal information, or information protected under the *Act,* we may require you to make a formal request under the *Act* for access to records. The *Act* gives us 30 business days to respond to a formal request, starting on the date your request is received (the *Act* also allows that time to be extended). Please note that in some cases the *Act* may require us to refuse you access to even your own personal information. We will give you written reasons for every decision on a formal request.

8.3 Before disclosing your personal information, we will require you to verify your identity, so we can be assured that you are the individual whose information is being requested. This helps ensure we do not disclose your personal information to someone to whom it should not be given.

9. CORRECTION OF PERSONAL INFORMATION

9.1 If you believe there is an error or omission in or from your personal information, you can contact us in writing and ask us to correct it. If we decide to correct your information, we will do so as soon as reasonably possible. If we decide not to correct your information, we will note your requested change on the information as well as why we did not correct your information as you asked.

10. RETENTION AND DISPOSAL OF PERSONAL INFORMATION

10.1 If we use your personal information to make a decision that directly affects you, we will keep it in accordance with relevant record retention schedules, as per Town policies. We use reasonable efforts to ensure that your personal information is destroyed securely in accordance with our records retention schedules.

11. SAFEGUARDING OF PERSONAL INFORMATION

11.1 The Town administers reasonable security standards to ensure the personal information in its custody and/or control is secure at all times.

11.2 Town of Golden employees and service providers are responsible for ensuring the physical and technical security of all data (including data at rest or in transit) and must meet all applicable security standards.

12. PRIVACY COMPLAINTS

12.1 Any complaint about any privacy-related matter under this policy or under the *Act* must be made to us in writing or by filling out a Privacy Complaint Form. If needed, our

complaint and correction procedure allows us to take complaints by phone while filling out the form.

12.2 We will consider your complaint, including complaints about a breach of your privacy, and will disclose the outcome to you in writing. We expect you to co-operate reasonably and in a timely way with our investigation, including by promptly providing us with information that we might reasonably need to complete our investigation. Your failure to do so may result in our being unable to proceed any further with your complaint.

12.3 You can make a written formal complaint to the Office of the Information and Privacy Commissioner for British Columbia, although we encourage you to use our complaint procedure first. We aim to respond to your complaint and resolve your concern to your satisfaction.

13. PRIVACY BREACHES

13.1 Information regarding our procedures for responding to a privacy breach is outlined in the *Town of Golden Privacy Breach Procedure*.

14. EDUCATION AND AWARENESS

14.1 All Town employees receive training on the *Act* and privacy generally as appropriate to their work function.

15. PRIVACY IMPACT ASSESSMENTS

15.1 Privacy impact assessments (PIAs) are conducted to determine if a proposed system, project, program, service or activity meets or will meet the requirements of Part 3 of the *Act*. A PIA will be done for a new initiative or for updates to existing initiatives. An initiative is an enactment, system, project, program, or activity that involves the collection, use or disclosure of personal information.

16. SERVICE PROVIDER MANAGEMENT

16.1 Employees who prepare or manage contracts with service providers are to include the standard privacy language, as designated by the Head, in all contracts that involve the service provider having access to, or collecting, using or disclosing, personal information in the custody or under the control of the Town.

17. INFORMATION SHARING AGREEMENTS

17.1 If initiatives include a regular or systematic exchange of personal information with partners outside of the public body, an Information Sharing Agreement must be completed and submitted to the Head.

18. ROLES AND RESPONSIBILITIES

18.1 The Chief Administrative Officer approves policy and procedures and ensures all employees are given notice of, and access to, a copy of the policy.

18.2 Department Heads:

a. Support and co-operate with the Head and Coordinator in implementing the policy and in complying with the *Act*.

b. Are responsible for overseeing the collection, use, disclosure, retention and disposal of personal information within their departments to ensure compliance with the *Act* and the Town of Golden's policies and bylaws.

18.3 The Director of Corporate Services & Communications/Corporate Officer:

a. Is designated the Head for the purposes of the *Act* and as such has full responsibility for compliance with the *Act.*

b. Is responsible for overseeing the duties and responsibilities of the Corporate Services team.

18.4 The Manager of Corporate Services/Deputy Corporate Officer is designated as the Information and Privacy Coordinator.

18.5 The Head may delegate any of the Head's duties under the *Act* to the Coordinator.

18.6 The Corporate Services Department:

a. Under the direction of the Head, responsible for the development, management and implementation of the Town's privacy management program, including ongoing assessments and revisions.

b. Coordinates employee training and education, ensuring that all new employees receive orientation and training on the *Act* and the Town's relevant bylaws and policies within the first year of their employment.

19. REVIEW

19.1 This policy shall be reviewed by the Corporate Officer every year or when legislation changes.

MAYOR CHIEF ADMINISTRATIVE OFFICER