



Policy Number: 2026-03
Date of Issue: May 19, 2026
Policy Subject: Privacy Management Program Policy

1. POLICY STATEMENT

The Village of Myrnam (the “Village”) is committed to protecting the personal information of individuals it collects, uses, and discloses in the course of its municipal operations. This policy establishes a Privacy Management Program to ensure compliance with the Protection of Privacy Act (POPA).

2. SCOPE

This policy applies to:

- All employees, Council members, volunteers, contractors, and third-party service providers acting on behalf of the Village.
- All personal information collected, used, or disclosed in any format (paper, electronic, verbal).

3. DEFINITIONS

- **Personal Information:** Any recorded information about an identifiable individual, including but not limited to names, addresses, contact information, identification numbers, and other data as defined in POPA.
- **Privacy Breach:** Unauthorized access, use, disclosure, or loss of personal information.

4. PRIVACY MANAGEMENT PROGRAM REQUIREMENTS

The Village’s program will include:

1. Accountability

- The Chief Administrative Officer (CAO) is designated as the Privacy Officer, responsible for overseeing compliance with POPA and this policy.

2. Collection, Use, and Disclosure

- Personal information is collected, used, and disclosed only for legitimate municipal purposes.
- Individuals will be informed at the time of collection about the purpose of the information and any applicable disclosures.

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3. Consent

- Consent will be obtained where required by POPA, either explicitly or implicitly depending on the type of information and use.

4. Safeguards

- Reasonable administrative, technical, and physical safeguards will be applied to protect personal information.
- Examples include locked filing cabinets, password-protected files, limited access to electronic records.

5. Access and Correction

- Individuals have the right to access their personal information and request corrections if it is inaccurate or incomplete.
- Requests should be submitted to the CAO.

6. Retention and Disposal

- Personal information will be retained only as long as necessary for the purpose for which it was collected, or as required by law.
- Disposal will be secure, e.g., shredding paper documents and securely deleting electronic files.

7. Privacy Breaches

- Any suspected breach must be reported immediately to the CAO.
- The CAO will investigate, mitigate, and report breaches in accordance with POPA.

8. Training and Awareness

- All employees and contractors handling personal information will receive training on their responsibilities under POPA and this policy.

9. Monitoring and Review

- The Privacy Officer will conduct annual reviews of the Privacy Management Program to ensure compliance and update practices as necessary.

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5. ROLES AND RESPONSIBILITIES

Role	Responsibility
Chief Administrative Officer	Privacy Officer, oversees compliance, investigates breaches, provides training
Employees / Volunteers	Follow policy, report breaches, safeguard personal information
Council	Ensure program is resourced and supported

6. REVIEW AND CONTINUOUS IMPROVEMENT

- This Energy Policy will be reviewed at least once every five years or earlier if required due to technological, regulatory, or financial changes.

MAYOR

CHIEF ADMINISTRATIVE OFFICER