

Town of Blackfalds - Privacy and Security Statement

As a local public body, the Town of Blackfalds is subject to the *Freedom of Information and Protection of Privacy Act* (FOIP). We value our residents and visitors and take personal privacy seriously. In the course of providing products and services, we may collect personal information that we understand is considered private or confidential. We are therefore providing this Privacy and Security Statement to explain our commitment to privacy, outlining our practices and policies for collecting, using and sharing information collected.

Generally, users can browse through our secure website without giving any personal information. If you request access to online services, or if you provide us with your personal information in an email, this Privacy and Security Statement describes how and when we collect your personal information and how we use it. We do not automatically gather any personal information from you, such as your name, phone number, email or address. This information is only obtained if you supply it voluntarily, usually through contacting us via e-mail, or registering in a secure portion of the site.

We developed this Privacy and Security Statement to be transparent about information we collect and how we use it when you, either, visit the Town of Blackfalds website or register for an online service or program. Review the full text of our Privacy and Security Statement below.

Privacy and Security Statement Table of Contents

- Copyright / Intellectual Property
- Liability
- Disclosure
- Our Privacy Principles and Commitment to Privacy
- Freedom of Information and Privacy - FOIP
- What is Personal Information?
- How We May Use Your Information
- Visiting Our Website
- Information Collected Automatically Via the Internet
- Logging Practices
- Google Analytics
- Links to Other Websites
- Cookies
- Email Comments, Questions or Responses
- Online Activity (e-newsletters, e-billing services, credit card transactions, questionnaires, forms)
- Collecting and Using Personal Information
- How We Protect Your Information
- Your Right to Review Your Information
- Keeping Your Information Accurate
- Release of Your Information
- Information Disclosure to Non-Affiliated Entities
- CASL – Canada's Anti-Spam Legislation
- Video Surveillance
- Council Meetings – Video and Live-Streaming
- Changes in the Privacy and Security Statement
- Your Concerns Matter to Us
- Who Can Answer Your Questions About Privacy?

Copyright / Intellectual Property

The site content (which includes all logos, graphics, documents, designs and source code) unless otherwise identified, is the copyrighted material of the Corporation of the Town of Blackfalds or is republished by the Town of Blackfalds under license. Site visitors may not copy,

reproduce, republish, decompile, distribute, post, display or transmit the site content without the express permission of the Town of Blackfalds.

Liability

The site content on the Town of Blackfalds website has been provided as a public service. The information is made available in good faith and is derived from sources believed to be reliable and accurate at the time of release on the Internet. However, the information is provided solely on the basis that readers will be responsible for making their own assessment of the matters discussed herein and are advised to verify all relevant representations, statements and information. Changes in circumstances after a document is placed on the Internet may affect the accuracy of the information. Additionally, materials may be maliciously vandalized. No assurance is given as to the accuracy of any information contained after publication on the Internet. While every attempt has been made to ensure its accuracy, the Town of Blackfalds makes no warranties or representations, expressed or implied, concerning the accuracy, reliability, or completeness of the information contained in or linked from this website. In the event of a discrepancy between the information contained on this website and the information contained in the records of the Town of Blackfalds, the information contained in the records of the Town of Blackfalds shall be deemed accurate. Each user waives and releases the Town of Blackfalds, to the full extent permitted by law, from any and all claims relating to the usage of material or information made available through the Town of Blackfalds website and its subdirectories. Under no circumstances shall the Town of Blackfalds be liable for any direct, indirect, special, punitive, incidental, or consequential damages arising out of the use of, or the inability to use, the site content. The Town of Blackfalds reserves the right to terminate or block access to site content whenever and wherever necessary.

Disclosure

The Town of Blackfalds will not sell, share, lease or disclose personal information to any third party without proper notification as authorized under FOIP. We will ensure that personal information is not disclosed to any individual, agency, or other government authority except when required by Canadian law. Personal information may be used for statistical or comparative analyses prepared by, or on behalf of, the Town. The resulting summary data cannot be associated to an identified individual or business.

The Town records visits to this website and logs the user's server or proxy address, the date/time/length of the visit and the files requested for statistical purposes. The information is used to analyze our server traffic. No attempt will be made to identify users or their browsing activities except where authorized by law.

Our Privacy Principles and Commitment to Privacy

- We adhere to strict standards, in terms of security and confidentiality, while protecting all personal information we collect.
- We maintain physical, electronic and organizational safeguards to protect this information.
- We require any person or organization providing products or services on our behalf to protect the confidentiality of this information.
- We permit only authorized employees and contractors, including but not limited to consultants, to have access to non-public personal information for consistent purposes.
- We afford all customers, whether former or existing, the same protections with respect to the use and sharing of their information.

The Town of Blackfalds respects your privacy and is committed to protecting the personal information that you share with us. Personal information that is in the custody of, or under the

control of, the Town is protected by the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIP).

Freedom of Information and Protection of Privacy - FOIP

Any personal information you provide is managed according to the *Freedom of Information and Protection of Privacy Act* (FOIP). This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected and that you have a right of access to the information.

Public information may include communications and correspondence addressed to municipal elected officials by members of the public. These Communications may also appear on the public agenda of committees or Council. The same privacy legislation may deem some records to be private or privileged if of a personal nature. Privacy legislation compels the municipality to review all documents prior to their disclosure. To learn more about the *Freedom of Information and Protection of Privacy Act*, please visit www.oipc.ab.ca

What is Personal Information?

'Personal Information' includes any information by which you can be personally identified, such as your first name, last name, address, telephone number, email address, credit card number, date of birth, purchase information, membership number, relationship with another family member, your photo and any other similar information. You may provide us with personal information under a wide range of circumstances, such as when you submit information to us through our website or mobile applications, sign up for email, e-newsletter or e-billing, book a reservation, enter an online promotion, sign up for programs or services, request information, submit an application for employment, apply for credit services or provide feedback in a survey.

'Non-Personal Information' is information, about you, that does not personally identify you. Information of this type is often obtained through your use of our website, mobile applications and visits to our business.

How We May Use Your Information

We will use the information you provide to us for the specific purposes for which you provided the information, as stated at the time of collection. The following are some other ways in which we may use your information to administer and provide the products and services you request:

- to operate and promote our programs and services;
- to notify you about programs and services provided by us, our affiliates or other associated third parties;
- to improve the programs and services we provide and develop new programs and services;
- to improve our website and mobile applications;
- to track your use of our website and mobile applications for internal market research;
- to ask for your participation in internal market research;
- to generate aggregate statistical studies;
- to contact you in response to your inquiries, comments and suggestions;
- to provide you with a secure and safe environment;
- to uphold our right to protect our property or to enforce our agreements with you;
- to cash your checks, extend you credit, process credit card and/or other financial transactions;
- to contact you when necessary; and
- otherwise, with your consent or as permitted or required by law.

Visiting Our Website

Our goal is to provide access to the widest possible audience. This site conforms to the Web Content Accessibility Guidelines of the [Worldwide Web Consortium \(W3C\)](#), to support users of all abilities. This includes visually impaired or blind visitors using screen reading software.

When you visit the Town of Blackfalds secure website, you do so anonymously – there is no need to tell us who you are. If you direct an enquiry to a Town department, we will ask you to provide your name and mailing address or email address for the purpose of issuing a response. Only those who “need to know” will have access to any personal information provided.

Encryption technology protects personal information during transmission. A notice stating “you are in a secure site” will be posted on Town pages when you are in an encrypted session. Secure pages are not saved in temporary caches on a computer. Once you exit secure screens, those screens cannot be accessed again. If encryption is not available on a page, an alternate means of communication will be recommended.

The Town web server does not collect or retain your e-mail address, although some internet service providers may automatically include your e-mail address with your IP address (internet protocol).

Any Town site where personal information is requested will contain a notice outlining our legal authority to collect it and include the following information:

- the purpose for collecting the personal information;
- how it will be used; and
- who to contact if you have any questions about these practices.

Personal information is retained and disposed of according to the FOIP Act and our records retention schedule. To ensure personal information is unrecoverable, a utility program is used to remove electronic data and paper records are shredded.

PDF documents - Some documents on this secure website are available in a PDF format. Adobe Acrobat is needed to open these files. Acrobat is available to download at no charge from [Adobe](#).

Printing pages - The text on this web page was designed to print on regular 8.5" x 11" paper, free of navigation and other non-content elements. Use your browser’s ‘print’ command to preview how pages will print and to select printing options.

Text size - Web pages can be enlarged or reduced by clicking on your browser’s menu and choosing size options.

Information Collected Automatically Via the Internet

The Town of Blackfalds uses a secure protocol (https) when accessing our server. Logs capture computer information, navigation and clickstream data.

Much of the information collected does not identify who you are. Other information, such as your domain name or IP address, may identify you depending on the naming standards followed by your Internet service provider. You may wish to ask them about their policies and practices.

Although we make no attempt to link the information captured to the identity of individuals, the information captured does identify the following:

- the Internet domain and IP address from which you access our secure website
- the type of browser and operating system used to access our site
- screen resolution of your monitor

- the date and time you access our site
- the pages you visit
- the address of any website from which you linked to the Town of Blackfalds website

This information is used to help us make our site more useful to our audiences by learning about the number of visitors to our site, and by monitoring traffic patterns and the types of technology our visitors use. We do not track or record information about specific individuals and their visits. Visitor information is not disclosed to anyone except Town of Blackfalds personnel who need the information for legitimate business purposes, such as responding to a request.

Logging Practices

The Town of Blackfalds logs HTTP requests to the secure Town Web server. These logs record the IP address of site visitors. An IP address is the number automatically assigned to a computer or to the ISP (Internet Service Provider) requesting a URL. The Town cannot identify you from this information. The Town uses log files for systems analysis, maintenance and site evaluation. We collect and use only information we believe is necessary to find out how many people visit our website and which sections of the site are visited the most frequently. This helps us to gather analytics and know what type of information visitors to our site are seeking, so we can improve our website and make it easier to access information. We record the numbers of visitors to our website, but no information about individual visitors is kept or used.

We do not link information with the identity of individuals visiting our sites unless an attempt to damage our site has been detected.

Google Analytics

The Town of Blackfalds uses Google Analytics to gather statistics on portions of its web site. The Town will use the information gathered to improve digital services for site users.

Google Analytics employs cookies to define user sessions, which allows for the collection of important data about how our patrons are using the site. Google Analytics uses only first-party cookies for data analysis. This means that the cookies are linked to the Town's website domain, and the Town will only use the collected specifics and cookies for aggregate data, including age, gender and possibly interests for non-individual statistical analysis related to browsing behaviour.

According to Google, the data collected cannot be altered or retrieved by services from other domains. If you choose, you can opt out by turning off cookies in the preferences settings in your browser. For more information on Google Analytics, please visit [Google's web site](#) and source their [Google Analytics privacy statement](#)

Links to Other Websites

The Town's secure website may contain links to other sites. The Town of Blackfalds is not responsible for the content and privacy practices of other websites. The Town encourages you to examine the privacy policy and disclaimer of each site in regard to the disclosure of your personal information to that site.

Cookies

Cookies are small text files that instruct your computer how to view a particular web page. They are sent to your browser when you access a website. Your browser will return this cookie information to the domain where the cookie originated.

Some Town web pages use cookies for one of the following three practices:

- Single-session cookies, which log users over a single session and do not maintain data over multiple sessions or visits;
- Multi-session cookies for use in web analytics, which log users over multiple sessions purely to gather data to analyze web traffic statistics; and
- Multi-session cookies for use as persistent identifiers (persistent cookies), which log users' activities over multiple visits with the intent of remembering data, settings, or preferences unique to that visitor.

The Town of Blackfalds uses session cookies as an additional security feature for its online services. For example, when you log in to any online service and are verified through your customer identification number and password, a cookie will store the identification number of your browser. Throughout your session, the session cookie acts as a type of digital signature to identify your current session to the Web server.

We also use session cookies to track your visits within our site. We use that information to determine the type of information that you are looking for and to improve our site. We use information about the website you visited immediately prior to our site to assess the viability of links that we have created on third-party sites.

The Town's website also uses persistent cookies to improve users' experience by remembering settings related to functionality. Other multi-session and single-session cookies are used in combination with the website's analytics software for website improvements.

The information stored in "persistent cookies" is written onto your hard drive and remains there until the expiry date of the cookie. The Town of Blackfalds also uses persistent cookies to store non-sensitive information that you are aware of and have agreed to.

You may accept or decline cookies. All Web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer.

By declining cookies, interactive features or online services that depend on cookies will not function as intended. If you choose to accept cookies, all browsers offer the ability to later delete cookies that you have accepted. If you choose to delete cookies, any settings and preferences controlled by those cookies will be deleted and may need to be automatically recreated upon a return visit.

The Web server will monitor the number of your browser to ensure that, at all times during your session, we are dealing with you.

Currently, most browsers do not distinguish between session cookies and persistent cookies. For Web services to operate, your browser must be set to accept cookies. If you are concerned about having your browser enabled to accept cookies while you are surfing other websites, we recommend that you enable your browser to notify you when it is receiving a cookie. This gives you the ability to accept or reject any cookie presented by the Web server you are visiting.

Email Comments, Questions or Responses

When you send us an email or ask us to respond to you by email, we learn your exact email address and any information you have included in the email.

We use your email address to acknowledge your comments or reply to your questions, and we will store your message and our reply in case we correspond further. We may also use your email address to send you information about other services of the Town of Blackfalds that we believe may be of interest to you. If you don't want us to contact you with other service information by email, you may tell us so at any time.

Email over the Internet is generally unencrypted. As part of an application, the Town of Blackfalds may request that you transmit confidential information to us over the Internet, and in these cases, we will ensure that the transmissions are encrypted. We recommend that you use caution when forwarding free-format email messages to us and that you do not include confidential information (for example, an account number) on those messages, as they are not encrypted.

Online Activity (e-newsletters, e-billing services, credit card transactions, questionnaires, forms)

Should you choose to provide us with personal information—as in an email or by filling out a form and submitting it to us through our secure website—we will use that information to respond to your message and to help us get the information you have requested. The Town of Blackfalds does not collect personal information for commercial marketing or distribution to any private organizations. Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, you can use another method such as fax or regular mail.

e-newsletters: Personal information is collected in accordance with Section 3 of the *Municipal Government Act* and Section 33 of the *Freedom of Information and Protection of Privacy Act*. It will be used, solely, to distribute an electronic newsletter.

Using our online e-billing services: When you register for one of our online services, for example, your tax account or permits, we compile a profile for you for that service. Your profile includes your name, address, account number(s), customer identification number and some other information relevant to the specific service.

Each time you use our online services, we collect your customer identification number, information about the transaction(s) that you complete and any Web pages you visit while using the service.

We use your profile in responding to your inquiries about the service. We use your customer identification number to identify you as a user of the service. We use aggregate transaction information to assess and improve the service.

Credit card transactions: All credit card transactions for the Town of Blackfalds are processed in accordance with our Credit Card Acceptance Policy. This policy established control measures for the use of credit cards for the payment of municipal accounts while ensuring the liability of the Municipality is protected. This policy authorizes the Town to accept payments for receivables as well as processing payments for cash sales.

Online questionnaires: The Town of Blackfalds occasionally invites public comment through questionnaires for the purposes of program evaluation, program planning and/or to obtain public input.

In some instances, we utilize the services of a third-party service provider. Information from these questionnaires may be stored electronically on a server outside of Canada and may be subject to laws within that country.

Completion of online questionnaires is done on a voluntary basis and, in most cases, no personal information is required.

If there ever were a need to collect your personal information, the Town of Blackfalds would indicate this with the questionnaire and provide a name and contact number for the individual who can answer any questions you may have about such collection. The intent is to provide enough information for you to make an informed decision on whether to participate and provide personal information.

Online forms: Personal information is collected in accordance with Section 3 of the *Municipal Government Act* and Section 33 of the *Freedom of Information and Protection of Privacy Act*. It will be used strictly for the purpose(s) of the program or service being applied for.

Collecting and Using Personal Information

When we collect information about you, we will explain how we intend to use it. We will limit the information we collect to what we need and we will use it only for the outlined purposes. We will obtain your consent if we wish to use your information for any purpose that is not consistent with the purpose for which it was originally collected.

Any personal information collected for the creation of an online user account is for the customization of your account and is collected under the authority of Section 33(c) of the *Freedom of Information and Protection of Privacy Act*.

If you choose to provide us with personal information in an email or by submitting a form to our secure website, we will use that information to respond to your message and get the information you have requested.

How We Protect Your Information

Personal information is managed and protected according to Part 2 of the FOIP Act and we will only retain your information as long as it is required.

The length of time we retain information varies depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with us but only as long as it is legally necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

We have thorough security standards to protect our systems and your information against unauthorized access and use.

For example, our systems are designed to ensure that your password is always private and confidential. When you use a password, it is scrambled after you enter it. For your protection your password is known only to you. Our employees cannot gain access to it and they will not ask you to reveal it. Nor should you share your password or customer identification number with family members or others.

We audit our procedures and security measures regularly to ensure they are being properly administered and that they remain effective and appropriate.

When we provide information in response to a legal inquiry or order, we ensure that the order is valid and we disclose only the information that is legally required.

All employees of the Town of Blackfalds are familiar with the procedures that must be taken to safeguard customer information.

Your Right to Review Your Information

We will give you access to the information we retain about you upon written request. Most of this information is in the form of your transaction records. These are available to you through your account statements, by visiting the Town Office or by accessing your account through our online services.

If you require other information, simply contact the department or office where your account is maintained. We will ask you specific details such as your name, address and account number in order to assist you with your request.

Keeping Your Information Accurate

We will make every reasonable effort to keep your information accurate and up to date. Under the provisions of FOIP, you have the right to correct your personal information.

Having accurate information about you enables us to give you the best possible service. You can help by keeping us informed of any changes: for example, a new address or telephone number. If you find any errors in our information about you, let us know and we will correct them immediately and make sure the correct information is conveyed to anyone we may have misinformed. If any information remains in dispute, we will note your opinion in the file.

Release of Your Information

We will only release your personal information to third parties, in limited circumstances, as authorized under Sections 17(2) and 40 of the *Freedom of Information and Protection of Privacy Act* (FOIP). Some of these circumstances are:

- where we have your written consent; or
- to those departments within the Town of Blackfalds who assist us in serving you; or
- where we are required or permitted to do so by law.

We limit the amount of information we provide in these circumstances.

Information Disclosure to Non-Affiliated Entities

As required, information may be shared with or collected by third party service providers who provide us with services such as data hosting or processing, credit card processing, credit checks or processing and fulfilling reservations or purchases. We require that these providers exercise reasonable care to protect your personal information and restrict it to the purposes for which it was provided to them.

We may share certain limited information about you with other companies with whom we have joint marketing agreements or other businesses with whom we have a contractual relationship, who may contact you as part of a third-party program. These agreements generally include financial services companies, such as banks and insurance companies or other service providers contracted by the Town.

We may transfer or provide a copy of your personal information to non-affiliated third parties in connection with an acquisition, merger, restructuring, sale, reorganization or other transfer involving any of our properties or all or any portion of our business.

We may also disclose your personal information to third parties for the following purposes:

- as required by law or regulation;
- to comply with legal, regulatory or administrative requirements of any governmental authorities;
- to comply with a court order, subpoena, search warrant or other valid legal process;
- in connection with any legal action, claim or dispute, including but not limited to the collection of debts; and
- for the protection of persons or property.

CASL – Canada's Anti-Spam Legislation

[Canada's Anti-Spam Legislation \(CASL\)](#) came into effect July 1, 2014 and is in place to protect Canadians while ensuring that businesses can continue to compete in the global marketplace.

In accordance with CASL, Canada's Anti-Spam Legislation, unless there is a pre-existing business relationship, written consent is required to receive commercial electronic messages (CEM's). The Town sends out e-newsletters and e-billing and uses email, SMS, social media and instant messaging to send commercial or promotional information about the programs and services available in our municipality to residents, visitors and other important audiences. The Town will make every effort to ensure that we comply with mandatory content of CEM's, ensuring that a valid form of consent is recognized by way of opting in. The unsubscribe mechanism must be able to be readily performed and any opt out or unsubscribe request will be honored no later than 10 business days after it is received.

Opting out will not prevent your personal information from being shared by our affiliates for any purpose or used for other non-marketing purposes described in this policy.

On January 15, 2015, [new rules about installing computer programs](#) came into force. It is now illegal to install programs, such as malware, on someone's computer without consent.

Video Surveillance

We use video surveillance systems to monitor Town properties and facilities. Surveillance cameras are used for security purposes and to protect us, our customers and employees against potential violations of criminal or civil laws. Surveillance camera output is monitored by authorized employees and may be viewed by law enforcement and regulatory authorities. Signage is posted near cameras to notify users of the area that personal information may be captured and recorded.

Council Meetings – Video and Live-Streaming

The Town implemented live streaming of public Council meetings on October 8, 2019 to improve accessibility, provide greater access to Council decision-making and encourage openness and transparency. It is not the intent of live streaming, recording and publishing to capture those in the gallery area. Clearly marked notices are posted and all attendees consent to their image, voice or comments being recorded. Barring technical difficulties, recordings of each public meeting of Council will be published on the [Council page of the Town website](#) and the [Town's YouTube © channel](#) within 3 working days. Individuals are free to view and share recordings for personal, non-commercial purposes. Sole responsibility for any charges imposed by a service provider lies with the individual. Video, images and audio contained in a live stream or recording must not be altered, reproduced or republished without the express written permission of Council. As live streaming is not interactive, any inquiries are to be directed through the [Office of the CAO](#).

Changes in the Privacy and Security Statement

Over time, it may be necessary to modify or supplement our Privacy and Security Statement. When we make changes, we will post the changes to our website. Amendments will be effective upon posting on the website. We encourage you to visit our website from time to time to review this statement in the event it may have changed. Your continued provision of information to us or use of our website following the posting of changes to the Privacy and Security Statement means that you accept the changes and our use of your personal information in accordance with the revisions. If the Town makes any material changes, each Town department will provide revised versions and may provide a public notification of relevant changes affecting their areas.

Your Concerns Matter to Us

If you have concerns or questions about privacy and confidentiality, or concerns about the way a request was handled, you can take the following actions:

- Begin by contacting the director of the department/office that handles your account. They have the decision-making authority to resolve most concerns.
- If your problem or concern remains unresolved, please contact the Records Management and FOIP Coordinator at foip@blackfalds.com or 403.885.6370.

Who Can Answer Your Questions About Privacy?

To discuss any privacy concerns that are not addressed in our Privacy and Security Statement, contact the Records Management and FOIP Coordinator at foip@blackfalds.com or 403.885.6370.

The Government of Alberta also maintains a website with free access to the *Freedom of Information and Protection of Privacy Act* at <http://www.servicealberta.ca/foip/>