

**Appendix B - Procedures for the Collection, Retention and  
Disclosure of Personal Information  
to  
Town of Newmarket  
Protection of Personal Information Policy CORP.1-0X**

**Collection of Personal Information**

1. Personal information will not be collected by Town staff unless essential for business purposes or authorized for collection under legislation, or Town bylaw;
2. A Privacy Impact Assessment (PIA) will be conducted for:
  - any new administrative program or new type of municipal service collecting, storing or using personal information;
  - significant changes made to an existing program or service such as conversion from a paper to electronic system or changes to the type or amount of personal information collected etc; and
  - significant changes to technology based business applications or implementation of new systems, which collect or retain personal information;
    - a. The privacy impact assessment will be completed by staff implementing the program or service and reviewed by the supervising Manager or Director;
    - b. The completed PIA will be provided to the Records and Projects Coordinator;
    - c. See Appendix B.i for the Privacy Impact Assessment form and Appendix B.ii for the guidelines for completing the assessment;
3. When personal information is collected there will be a 'notice of collection' statement setting out: the legal authority for collection, the principle purpose of collection, the title, business address, and contact information of the responsible employee or department. See Appendix B.iii for the Notice of Collection Template.
  - a. This statement will be provided on all written or electronic forms collecting personal information, will be available upon request when personal information is collected verbally, and will be clearly posted in municipal facilities where necessary;
4. Personal information will not be collected without the knowledge or consent of the individual to whom the information relates except in certain exceptions under s. 29 of the *Municipal Freedom of Information and Protection of Privacy Act* or when providing emergency care or treatment;
5. Personal information of minors (under 16) will not be collected without express or implied authorization of a parent / guardian except in the case of providing emergency treatment; and
6. All personal information collected will be complete and accurate.

**Appendix B - Procedures for the Collection, Retention and  
Disclosure of Personal Information  
to  
Town of Newmarket  
Protection of Personal Information Policy CORP.1-0X**

**Retention of Personal information**

1. Personal Information will be retained for one year after it is collected or used unless authorized under another retention period in the Classification and Retention Schedule (Appendix F of the Records Retention Policy CORP. 1-06); and
2. All personal information whether in paper or electronic form will be retained in a safe and secure manner.

**Use and Disclosure of Personal Information**

1. All personal information banks maintained by the Town will be kept as accurate and up to date as is reasonably possible. All personal information banks will be identified and the resulting listing shall be made available to all employees and the public upon request. See Appendix B.iv;
2. Personal information will only be used for the purpose for which it was collected unless for a 'consistent purpose' the individual to whom the information relates might reasonably expect, or unless authorized under statute or policy;
3. The use and disclosure of personal information for any purpose other than the one for which it was collected will only be permitted with the consent of the individual to whom the information relates, or in accordance with the provisions of s. 31 and s. 32 of the *Municipal Freedom of Information and Protection of Privacy Act*;
4. Access to personal information will be restricted to only those employees requiring access in order to carry out their duties;
5. Personal information will not be left exposed or visible on desks or computer screens;
6. Records containing personal information shall not be removed from the workplace unless authorized under another policy or statute. External and mobile devices containing or accessing personal information will be kept secure and managed according to data security and governance policy; and
7. Sensitive, personal or confidential information should wherever possible, be sent by regular mail or courier. If transmitting such information by email or fax, addresses and fax numbers must be verified to ensure that they are accurate.