

Appendix D - Privacy Breach / Complaint Procedures

To

Town of Newmarket

Protection of Personal Information Policy CORP.1-0X

1. All privacy breaches and privacy complaints will be immediately reported to the supervisor / manager.
2. The supervisor / manager will call the Town Clerk or designate to report the complaint or breach.
3. The supervisor / manager will send an email to the Town Clerk or designate and their Director outlining in detail the circumstances of the breach or complaint, identifying all staff involved, and the personal information at issue.
4. The Records and Projects Coordinator will contact the staff involved directly if necessary for any questions or follow-up required.
5. The Records and Projects Coordinator will send a notification to all affected parties of a privacy breach. The notification will:
 - a. provide details of the extent of the breach and the specifics of the personal information at issue;
 - b. advise of the steps that have been taken to address the breach, both immediate and long-term; and
 - c. advise that the Information and Privacy Commissioner of Ontario has been contacted to ensure that all obligations under the Act are fulfilled.
6. The Records and Projects Coordinator will report all privacy breaches to the Information and Privacy Commissioner of Ontario and senior management.
7. All privacy complaints will be investigated and a report submitted to senior management. The report shall include:
 - a. A description of the circumstances of the complaint and the personal information involved; and
 - b. An analysis of the cause of the complaint, staff actions and procedures, and any recommended solutions.