

Revision 0.1	Prepared By Krystal Mc Dowell Scott Lyall Jessica Meyer	Date Prepared 04/06/2022
Effective Date 1/1/2023	Reviewed By Olana Todoruk, Craig Hrynychuk,	Date Reviewed

Privacy Policy

Scheduled Review Date: January 2026

Policy Statement

The Alberta Municipal Health and Safety Association (AMHSA), is committed to maintaining the accuracy, confidentiality, and security of your personal information.

Purpose

This policy outlines AMHSA's privacy practices and how personal information is collected, used and disclosed.

Scope

This policy applies to the personal information of individuals who take training courses from AMHSA ("learners"), forums or webinar participants, training portal members, as well as AMHSA employees. If you are unsure whether this Privacy Policy applies to you, please contact AMHSA's Privacy Officer for more information.

Privacy Policy Effective for Canada

It is AMHSA's intent to comply with privacy legislation within each jurisdiction in which AMHSA operates. Sometimes privacy legislation and/or an individual's right to privacy are different from one jurisdiction to another. This policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

This policy has a limited scope and application. Consequently, the rights and obligations contained in this policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this policy applies to you, please contact AMHSA's Privacy Officer for more information.

Responsibilities

Executive Director

- Approve and implement policies that support escalation and reporting of validated privacy breach incidents to the AMHSA board of directors executive.
- Privacy breach reporting to the Board of Directors and Privacy Commissioner as required
- Compliance with privacy laws;

- Communications with provincial and federal privacy commissioners, and other governmental authorities responsible for privacy; and
- Investigations, inquiries, complaints, and other proceedings related to the privacy of personal information.

Privacy Officer

- Responding to requests for access to, and correction of, personal information, and other requests from data subjects;
- Facilitate inquiries, complaints, Investigations and other proceedings related to the privacy of personal information.
- Privacy breach response and reporting (If applicable)

Director of Operations

- Oversight of collection, use, and disclosure of personal information;
- Investigations of potential breaches as required
- Compliance with privacy laws;
- Ensuring all employees receive appropriate personal information privacy training
- Ensuring personal information is stored and transmitted according to AMHSA's data classification system (further information about AMHSA's data classification system is available in the table below).
- Ensuring personal information is stored and transmitted according to AMHSA's data classification system (further information about AMHSA's data classification system is available in the IT/Cyber Security and Data Breaches Policy).

Director of Learning and Assurance

- Investigations, inquiries, complaints, and other proceedings related to the privacy of personal information
- Privacy breach response and reporting;
- Ensuring all employees receive appropriate personal information privacy training

Employees

- Ensuring that personal information is collected, used, and disclosed in accordance with this Privacy Policy and as otherwise directed by AMHSA;
- Ensuring personal information is collected, used, and disclosed on a need-to-know basis, and only for the purposes of carrying out the employee's roles and responsibilities to AMHSA;
- Attending all personal information privacy training assigned by Functional Leader;
- Diligently reporting any actual or suspected improper collection, use, or disclosure of personal information; and
- Diligently safeguarding the confidentiality and privacy of personal information, including by maintaining a clean desk at all times; not leaving sensitive or confidential information, including personal information, unattended; and securely transferring physical and electronic records.

Contractors

- ensuring that personal information is collected, used, and disclosed in accordance with this policy and as otherwise directed by AMHSA;
- diligently reporting any actual or suspected improper collection, use, or disclosure of personal information; and
diligently safeguarding the confidentiality and privacy of personal information, including always maintaining a clean desk; not leaving sensitive or confidential information, including personal information, unattended; and securely transferring physical and electronic records.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

What Personal Information Does AMHSA Collect?

You can visit AMHSA's website without telling us who you are or revealing any information about yourself, including your e-mail address. Our web server may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page that is viewed by that IP address and what country you are from. We use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website.

AMHSA collects and maintains different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address, and any other contact or other information that you choose to provide by:
- using the "contact us" portion of this website;
- applying for a position with AMHSA through this website;
- by corresponding with a representative of AMHSA via e-mail using the hyperlinks created for that purpose;
- if you are a learner, we collect information about enrolment, attendance, participation, contributions, user / course feedback, email, online payment information, and grades related to courses you take from AMHSA.

When you request information from AMHSA, we may use the contact information that you provide to send you information about offers on products and services that we provide to, or receive from, you, or that we believe may be of interest to you. We may also contact you to provide you with, or collect from you, business relationship information, including information related to your agreements, preferences, advisors and decision-makers, feed-back and other information requested by or provided to you.

If you have asked us to put you on an e-mail mailing list, we may e-mail you our newsletter. Each of our newsletter e-mails includes an unsubscribe link that you can use to remove yourself from such

mailing lists. You can also contact safety@amhsa.net to unsubscribe from our mailing lists. We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. This information about our offers may include contract terms, and other information for the purpose of market analysis and strategic planning. We may also collect information related to our media, and public relations activities and information related to our interactions with financial and other analysts and advisors.

As a general rule, AMHSA collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may use the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Why Does AMHSA Collect Personal Information?

AMHSA collects personal information to manage, maintain, and develop business and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to be able to review the products and services that we provide and obtain from you so that we may understand your requirements and you may understand our requirements for such products and services and so that we may work to improve our products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to protect us against error, fraud, theft and damage to our goods and property;
- to maintain the integrity of the courses we offer to learners and to be able to provide records related to such courses;
- to enable us to comply with applicable law or regulatory requirements; and
- any other purpose to which you consent.

How Does AMHSA Use Cookies?

When you visit AMHSA's website, we place a "session cookie" on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the website so that we can better

understand your use of our website so that we can customize and tailor the website to better meet your needs.

Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (1) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (2) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you will not be able to access a number of web pages found on the website.

What About Links to Other Websites?

AMHSA's website may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. AMHSA is not responsible for how such third parties collect, use or disclose your personal information. AMHSA's secure member communication platform (Civilized Discourse Forum) maintains its own [privacy policy](#). You should review the privacy policies of these websites before providing them with personal information.

How Does AMHSA Use and Disclose Your Personal Information?

We may use and disclose your personal information:

- for the purposes described in this Privacy Policy;
- to determine suitability for an honour or award;
- in an emergency that threatens life, health, or safety; or
- for any additional purposes for which we have obtained your consent to use or disclose your personal information.

When Does AMHSA Disclose Your Personal Information?

The personal information we collect is used and disclosed for our business purposes, including for those purposes explained in this Privacy Policy.

We may share your personal information with our employees, contractors, consultants, and other parties who require such information to assist us with managing our relationship with you.

We may disclose your information to third parties, including: third parties that provide services to us or on our behalf; third parties that assist AMHSA in the provision of services to you; and third parties whose services we use to conduct our business.

For example BIS Training Software, with servers located in Canada, Civilized Discourse, with servers located in USA, Constant Contact, with servers located in USA but with personal data processed outside of USA like India or the Philippines, who may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your personal information may be collected, used, processed, stored or disclosed in Canada, the United States of America, or elsewhere. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of such other jurisdictions may be able to obtain access to your

personal information through the laws of the foreign country. Where possible, AMHSA tries to store all data on Canadian servers, where not possible, AMHSA works towards trusted locations.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of AMHSA through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of AMHSA's regular reporting activities to its regulatory bodies;
- to provide records relating to courses you have taken with us;
- if you are a prospective, current, or former employee of a municipality or other public body, we may disclose information related to the courses you have taken from us to the municipality or public body;
- to protect the rights and property of AMHSA;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent.

We find that learners often wish to share contact information so they can stay in touch with their fellow learners of the same course. In such situations, we will seek your consent to share your name, email address, and other personal information with other members of the same course.

Your Consent is Important to Us

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

Choice/Opt-Out

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

How is Your Personal Information Protected?

AMHSA endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while this website strives to protect your personal information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk. Once this website receives your transmission, we make commercially reasonable efforts to ensure its security on our systems.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact our Privacy Officer using the contact information set out below. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact the office of our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide

some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this policy or concerns about how we manage your personal information, please contact our Privacy Officer by telephone, or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

Privacy Officer

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

Privacy Officer
Attn: Craig Hrynchuk
Phone: 1-800-267-9764
Address: 176, 2755 Broadmoor Blvd, Sherwood Park AB, T8H 2W7
E-mail: privacyofficer@amhsa.net

Revisions to this Privacy Policy

From time to time, AMHSA may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our website www.amhsa.net and we encourage you to refer back to it on a regular basis. This Privacy Policy was last updated on the date provided above.

Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it shall mean "including without limitation."

This Privacy Policy does not impose upon AMHSA any obligations, or create or confer upon any individual any rights, outside of, or in addition to, those imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.