



approved by ARROW Utilities Board of Directors – June 20, 2025

The purpose of this policy is to ensure that the Board complies with the Protection of Privacy Act and the Access to Information Act, managing records in a manner that ensures privacy protection, accessibility, integrity and transparency.

Access to Information Act – Means Province of Alberta legislation that establishes the legislative framework on access to information in the public sector, providing for public accountability through a right of access to records under the control of public bodies.

Protection of Privacy Act – Means Province of Alberta legislation that aims to give Albertans peace of mind that their personal information is protected, where it is mandatory for public bodies to create programs and services with protection of privacy in mind and require that Albertans are notified if their personal information is involved in a privacy breach

STURGEON
COUNTY



Records Management – Means the systematic control of records throughout their lifecycle, from creation or receipt, through their processing, distribution, organization, storage and retrieval to their archiving or disposition.

Senior Officials and Employees – Means ARROW Utilities Directors and ARROW Utilities employees who handle personal information.

RESPONSIBILITIES

Applicant –

- a. Shall be required to pay a fee for service, the fee payable will be in accordance with the Access to Information Act (Bill 33), as amended from time to time or any successor Regulation that sets fees for requests for information from the Province.
- b. Will submit the request in writing and specify the records or information being sought.
- c. Will provide identification and specify their contact information.
- d. Will have the right to access records unless the information is exempted from disclosure under the Access to Information Act.

Board of Directors –

- a. Shall approve the Access to Information and Privacy Protection policy and comply with its standards.
- b. Will ensure compliance with this policy, providing resources necessary for effective records management.
- c. Will review and update this policy as required, at minimum every four years.

CEO –

- a. Shall provide organizational oversight ensuring compliance with the policy.
- b. Will ensure necessary Administrative Policies are in place to support the Access to Information and Privacy Protection

Document Controller –

- a. Shall maintain and implement Administrative Policies outlining procedures, standards and guidelines to Records Management, ensuring CEO approval.



STANDARDS/ PROCEDURES

- b. Handle requests for access to information, and address or provide notifications on privacy concerns.

ARROW Utilities commits to:

1. **Compliance with Protection of Privacy Act and the Access to Information Act**
 - a. ARROW Utilities will comply with all provisions of the Access to Information Act.
 - b. Personal information will be collected, used and disclosed in accordance with the Protection of Privacy Act.
2. **Collection of Personal Information**
 - a. Personal information will only be collected for purposes that are legal and necessary for the operation of ARROW Utilities
 - b. Individuals will be informed about the purpose and legal authority for the collection of their personal information.
3. **Use and Disclosure of Personal Information**
 - a. Personal information will only be used for the purpose for which it was collected or for a use consistent with that purpose.
 - b. Personal information will not be disclosed without the individual's consent, unless permitted or required by law.
4. **Access to Information**
 - a. Individuals have the right to access their personal information held by ARROW Utilities, subject to exemptions under the Protection of Privacy Act and the Access to Information Act.
 - b. Requests for access to information will be handled within 10 business days, unless in circumstances where more time is required due to the scope or volume of information requested, in which case the Applicant will be notified.
5. **Records Management**
 - a. ARROW Utilities will implement and maintain a comprehensive records management program.



- b. Records will be managed in a way that ensures their authenticity, reliability, integrity, and usability.
- c. Records will be securely stored and protected from unauthorized access, alteration and destruction.

6. Retention and Disposition of Records

- a. Records will be retained for as long as necessary to fulfil their purpose and comply with legal and regulatory requirements and in accordance with ARROW Utilities' Records Retention Policy.
- b. ARROW Utilities will establish and follow procedures for the secure disposal of records that are no longer needed.

7. Training and Awareness

- a. ARROW Utilities will provide training and support as required, to ensure that all employees are aware of their individual responsibilities under the Protection of Privacy Act and the Access to Information Act and this policy.

REFERENCE DOCUMENTS

Administrative Policy – Records Retention