

<b>Section:</b>	Administration (AD)
<b>Subject:</b>	Organization of the Institution
<b>Legislation:</b>	<i>Access to Information Act (RSA 2024, c A-1.4); Protection of Privacy Act (SA 2024, c P-28.5); Protection of Privacy (Ministerial) Regulation (143/2025).</i>
<b>Effective:</b>	April 10, 2024
<b>Revision:</b>	May 21, 2026

**APPROVED:** \_\_\_\_\_  
**President and CEO**

## **POLICY**

The policy of the Board of Governors is to comply with the *Protection of Privacy Act* (POPA) and the *Access to Information Act* (ATIA).

## **PROCEDURE**

### **DEFINITIONS**

#### **Personal information**

Recorded information about an identifiable individual and includes, but is not limited to, name, residential address and phone number, personal email address, sex (sex assigned at birth), age, gender identity, title, pronouns, sexual orientation, marital or family status, religious affiliation, Indigeneity, ethnicity, disability status, languages spoken, immigration status, identification number, education and employment history, health information including documentation of approved accommodations for physical or mental disability, an individual's personal views or opinions and information about an individual's financial matters.

#### **Privacy complainant**

A person who initiates a complaint believing that SAIT has improperly collected, used, allowed unauthorized access to, or disclosed their personal information. A privacy complainant can be any individual, including but not limited to members of the SAIT community.

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**Privacy complaint**

A formal expression of concern submitted by an individual (the “complainant”) regarding an alleged breach of privacy, which SAIT has improperly collected, used, allowed unauthorized access to, and/or disclosed their personal information.

**Privacy breach**

Any incident where personal information is collected, used, disclosed or accessed without proper authorization.

**GOVERNING PRINCIPLES**

1. SAIT is committed to providing a safe and secure process for individuals to raise privacy concerns, whether confidentially or anonymously, while ensuring that complaints are handled fairly, effectively and in compliance with the *Protection of Privacy Act* (POPA).
2. This procedure applies to the personal information of any individual while engaged with any activity related to their employment, contract, association or studies at/with SAIT. Refer to [procedure AD.1.1.1 Personal Information](#).
3. All complaints must first be assessed to determine whether they relate to the collection, use, disclosure or handling of personal information, or whether they fall under another SAIT policy or conduct matter (e.g., SAIT Code of Ethics). This assessment ensures that complaints are directed to the correct process and enable timely complaint response.

**PROCEDURE**

**A. Confidential Complaints**

1. Complainants may submit their privacy complaint, in confidence, with their identity known but protected, through any of the following secure methods:
  - a) Send an email to [access.privacy@sait.ca](mailto:access.privacy@sait.ca);
  - b) Call the Access and Privacy unit at 403.389.2707; or
  - c) Send written complaints addressed to the Access and Privacy unit, Office of General Counsel at:

Southern Alberta Institute of Technology  
1301 – 16 Avenue NW  
Calgary, AB, T2M 0L4  
Attention: Access and Privacy Advisor

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- d) Clearly mark the envelope “**Confidential - Privacy Submission**”.
  - e) Mail will be opened by authorized personnel and stored securely.
2. The privacy complaint must include the following:
- a) Complainant name and contact information. The complainant’s identity and details will be kept strictly confidential and shared only with individuals directly involved in the investigation;
  - b) Description of the privacy concern and extent of the circumstances affecting the complainant’s privacy;
  - c) The name of the school/department and/or name of the member of the SAIT community associated with the alleged improper collection, use and/or disclosure of the complainant’s personal information;
  - d) The date or time period when the alleged improper collection, use and/or disclosure of personal information had occurred; and
  - e) Supporting documentation, if any.

## **B. Anonymous Complaints**

1. SAIT encourages individuals to report privacy concerns, including through anonymous submissions, while recognizing that the lack of identifiable information may limit the scope of the investigation.
2. All anonymous submissions will be reviewed to determine whether there is sufficient information to investigate.
3. Limitations due to the lack of identifiable information will be documented, and the complainant will be informed, where possible, that anonymity may restrict the scope or outcome of the investigation.
4. Complainants may submit their privacy complaint, anonymously, without providing any identifying information through any of the following secure methods:
  - a) Send an email to [access.privacy@sait.ca](mailto:access.privacy@sait.ca). The email should not include any personal identifiers such as name, SAIT ID number or contact information.

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Complainants may wish to use a temporary or alternative email account that does not reveal their identity, to maintain anonymity.

- b) Send written complaints addressed to the Access and Privacy unit, Office of General Counsel at:

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1301 – 16 Avenue NW  
Calgary, AB, T2M 0L4  
Attention: Access and Privacy Advisor

- c) Clearly mark the envelope “**Confidential - Privacy Submission**” and do not include your name, return address or any identifying details.
  - d) Mail will be opened by authorized personnel and stored securely.
5. The privacy complaint must include the following:
- a) Description of the privacy concern and extent of the circumstances affecting the complainant’s privacy;
  - b) The name of the school/department and/or name of the member of the SAIT community associated with the alleged improper collection, use and/or disclosure of the complainant’s personal information;
  - c) The date or time period when the alleged improper collection, use and/or disclosure of personal information had occurred; and
  - d) Supporting documentation, if any.

### **C. Assessment and Investigation**

1. Due to the lack of contact information, anonymous complainants will not receive acknowledgement, responses or updates regarding their submission;
2. The processing time for investigating a privacy complaint will vary depending on the description, circumstances and level of complexity of the complaint. In general, the access and privacy advisor, office of general counsel, will take the following steps:
  - a) Notify the complainant by acknowledging receipt of the privacy complaint within 3 business days;

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- b) Contact the complainant to gather additional information or to obtain clarification, if required;
- c) Communicate with the school/department and with any individuals associated with the privacy complaint and/or who have knowledge of the circumstances about the complaint;
- d) Depending on the nature of the privacy complaint, the access and privacy advisor, office of general counsel, may consult with other schools or departments such as, for instance, Campus Security, Environmental Health and Safety, Human Resources, Information Technology Services, Office of Community Conduct, Office of the Registrar and/or Office of the Ombudsperson;

#### **D. Resolution**

1. Following appropriate assessment and investigation of the complaint, the access and privacy advisor will:
  - a) Decide on the appropriate course of action (such as, for instance, data correction, implementation of a procedural change and/or staff privacy training);
  - b) Communicate the outcome to the complainant (excluding anonymous complainants); and
  - c) Follow up with the school/department and individuals involved in the privacy complaint in order to implement any recommended remedial actions including escalation.

#### **POLICY/PROCEDURE REFERENCE**

- AD.1.1 [Privacy policy](#)
- AD.1.1.1 [Personal Information procedure](#)
- AD.1.1.2 [Privacy Impact Assessment procedure](#)
- AD.1.1.3 [Privacy Incident Response procedure](#)