

Title:	Correction of Personal Information
Effective Date:	2026 June 01
Responsible Business Unit:	Law, Legislative Services & Security – Information & Privacy Services

1. PURPOSE

- 1.1 This Administration standard will be followed when The City of Calgary (“The City”) receives a request to correct personal information pursuant to the *Protection of Privacy Act* (“*POPA*”) of Alberta.
- 1.2 Following this standard will result in:
 - a) Promoting the accuracy and completeness of personal information in the custody or under the control of The City;
 - b) Consistent and transparent processes being applied for the correction of personal information; and
 - c) Meeting legislative obligations for responding to requests to correct an individual’s personal information, including requests made by an authorized representative.

2. APPLICABILITY

- 2.1 This Administration standard applies to all City employees except:
 - a) Calgary Police Services, as a separate public body; and
 - b) Calgary Housing Corporation, as a separate public body.
- 2.2 This Administration standard applies to all records in the custody or under the control of The City.

3. STANDARD

- 3.1 Employees will:
 - a) Maintain the accuracy and completeness of personal information in The City’s custody or control;
 - b) Correct factual personal information without a formal request under *POPA*, if the information is not an opinion about the individual, including a professional or expert opinion, or an incorrect fact stated in a record of a third party or other public body;
 - c) Direct requests for correction of personal information to the appropriate business unit area or to the Privacy Officer for guidance and/or processing;
 - d) Verify the identity of the individual requesting a factual correction, or, where a request is made by a representative, verify both the identity of the individual and the authority of the representative to act on their behalf, before processing the correction request;

- e) Verify that all factual correction requests are supported by appropriate and relevant documentation or information to substantiate the requested correction;
- f) Make the requested corrections, or, where a correction is not made, apply an annotation or linkage to the request across all systems containing the personal information; and
- g) Document the decision.

3.2 Access and Privacy Program Administrators (“APPA”) will:

- a) Help their respective business units maintain compliance with the Administration standard;
- b) Identify public bodies or third parties that received the individual’s personal information that was corrected or annotated within the year prior to the request for correction;
- c) Assess whether the corrected or annotated personal information is material; and
- d) Provide the Privacy Officer with the information needed in a timely manner to complete required notifications to third parties or other public bodies.

3.3 Business Unit Managers will:

- a) Ensure business unit implementation of the Administration standard;
- b) Authorize the correction of personal information required by the business unit area; and
- c) Ensure the APPA is notified of any corrections to personal information made by the business unit area so the Privacy Officer can issue required notifications.

3.4 The Privacy Officer will:

- a) Notify public bodies or third parties that received the individual’s personal information within the year prior to the request for correction, where the correction or annotation is material;
- b) Dispense notification to public bodies or third parties, where the correction or annotation is immaterial, or the individual has provided written consent or agreement that notification is not required; and
- c) Ensure the individual receives written notice within 30 business days indicating whether the correction was made, or an annotation or linkage has been added.

4. CONSEQUENCES OF NON-COMPLIANCE

- 4.1 Employees who fail to adhere to this Administration standard may be subject to corrective action, including dismissal from employment, in accordance with the *Labour Relations standard*, the *Exempt Staff policy*, or the specified terms outlined in their employment contract.

4.2 In addition to any consequences from The City associated with not adhering to this Administration standard, failure to comply with the duties imposed by *POPA* or otherwise acting in contravention of the legislation may lead to penalties or offences under *POPA*.

5. DEFINITIONS

5.1 In this Administration standard:

- a) **Annotation** means a note added to a record indicating the individual's request for correction if no correction is made, and date it was added. An annotation is placed close to the disputed information;
- b) **Authorized Representative** means a person who is legally entitled to exercise an individual's rights or powers on the individual's behalf, including a personal representative of a deceased individual, a guardian or trustee, an agent or attorney, or any person with written authorization from the individual to act on the individual's behalf;
- c) **Control** means The City has the authority over the creation, use, distribution, retention or disposition of the records;
- d) **Correction** means a change to factual personal information to make it accurate or complete;
- e) **Custody** means records that are in The City's possession and may include records supplied by a third party;
- f) **Employee** means City staff and any person who performs a service for The City as an appointee, volunteer, or student or under a contract or agency relationship with The City as per *POPA*;
- g) **Factual** means what is actual or based on fact such as age, date of birth, contact information, income information and qualifications;
- h) **Linkage** means a mechanism used when a record cannot be directly updated, attaching, connecting the individual's correction request to the original record;
- i) **Opinion** means a subjective assessment, evaluation, or professional judgement about an individual. Opinions cannot be corrected but must be annotated or linked with the individual's request for correction;
- j) **Personal Information** means recorded information about an identifiable individual, including:
 - i. the individual's name, home or business address, home or business telephone number, home or business email address or other contact information, except where the individual has provided the information on behalf of the individual's employer or principal in the individual's capacity as an employee or agent;
 - ii. the individual's race, national or ethnic origin, colour or religious or political beliefs or associations;
 - iii. the individual's age, gender identity, sex, sexual orientation, marital status or family status;

- iv. an identifying number, symbol or other particular assigned to the individual;
- v. the individual's fingerprints, other biometric information, blood type, genetic information or inheritable characteristics;
- vi. information about the individual's health and health care history, including information about the individual's physical or mental health;
- vii. information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given;
- viii. anyone else's opinions about the individual; and
- ix. the individual's personal views or opinions, except if they are about someone else.

k) **Record** means any electronic record or other record in any form in which information is contained or stored, including information in any written, graphic, electronic, digital, photographic, audio or other medium, but does not include software or any mechanism that produces records.

6. ASSOCIATED GOVERNANCE

- 6.1 This Administration standard outlines requirements in support of the *Protection of Privacy policy*.
- 6.2 This Administration standard conforms to the *Protection of Privacy Act ("POPA")* and *Protection of Privacy (Ministerial) Regulation ("Ministerial Regulation")*.
- 6.3 If any provision of this Administration standard conflicts with any provision of *POPA*, the provision of *POPA* prevails.

7. HISTORY

Action	Date	Approval	Description
New	2026 Jun 01	Head of the Local Public Body	New Standard developed during the review of the Protection of Privacy policy.