



Guide to Developing Privacy Statements for Government of Alberta Websites

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Freedom of Information and Protection of Privacy

Guide to Developing Privacy Statements for Government of Alberta Web Sites

Table of Contents

About This Guide	1
Before You Begin	2
Locating Your Privacy Statement on the Site	4
Building Your Privacy Statement	5
<i>General Privacy Statements</i>	6
<i>Information Collected and Stored Automatically</i>	7
<i>Security</i>	11
<i>Privacy and Links to Other Sites</i>	11
<i>Information Collected in E-mails and Web Forms</i>	12
<i>Transactions Where Information Enters a System of Records</i>	13
<i>Getting More Information</i>	15
Sample Privacy Statements	16
Glossary	18

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About This Guide

This guide is meant to help World Wide Web (Web) site managers develop and use privacy statements on their Government of Alberta Web sites.

Several online surveys have indicated that privacy is a major concern of Internet users. These surveys indicate the concerns include a lack of transparency regarding the use and disclosure of personal information by Web sites, the tracking of an individual's activities on Web sites and concerns about the security of their personal information in the Internet environment.

Moreover, the *Freedom of Information and Protection of Privacy Act* (FOIP Act) governs the conditions under which public bodies may collect, use and disclose personal information and what information individuals must be given when a public body is collecting this information.

There are a wide variety of uses of the Internet across the Alberta government. For this reason, it is impossible to develop a single privacy statement that would cover all uses and circumstances under which personal information might be collected. Rather, this guide is meant to provide guidance to public bodies about different types of privacy statements that might be included, given a particular use of the site.

The content and functionality of an individual Web site will determine what kind of privacy statement you require. For example, a very simple site that just provides information may only require a general privacy statement. However, managers of sites that collect personal information from users need to ensure that the requirements of section 33 of the FOIP Act are met. The Guide provides sample statements from which you can build a privacy statement that is appropriate for the content and functionality of your site. At the end of the Guide, there are two sample privacy statements to show you what a complete statement might look like.

Placement of your privacy statement is also a very important consideration. Guidelines on the placement of the privacy statement on Government of Alberta Web sites are included.

If you have any comments on the information contained in this guide, please contact:

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Before You Begin

Developing your Web site privacy statement is not easy. The end result should help users to understand what information you are collecting about them and how it is to be used. Moreover, your statement should reflect your actual business practices and how your site is operated technically.

Here are four steps you can follow to develop a privacy statement that meets your needs:

Step 1: Bring Together a Multi-disciplinary Team.

Don't try to do it on your own. You'll want to include expertise from IT, FOIP and program areas. If possible, also get your legal counsel to participate in the process.

Bringing together this expertise will ensure:

- your practices comply with the *Freedom of Information and Protection of Privacy Act*,
- your program needs are met, and
- IT processes are understood.

While the entire team will develop the statement, it is wise to appoint one person to take responsibility for the actual writing. This way, the group can concentrate on the content. By having one individual responsible for the writing, you can avoid "writing by committee."

Step 2: Develop Draft Privacy Statements.

Before you develop your statement:

- consider how your Web site is used (e.g. broadcasting static information, providing customized entry points, conducting transactions with clients that collect personal information);
- think about your target audience and how knowledgeable they are about how Web sites operate (e.g. a senior's benefit site would likely have a different type of privacy statement than the site of the Office of the Chief Information Officer); and
- collect information about the technical operation of your site (e.g. does it use cookies, what data is captured automatically).

The examples in this guide can help you build a privacy statement that meets your needs. You'll have to analyze what makes sense in your particular case. The examples

provided here are only a starting point. You'll need to modify them depending on your actual practices.

Step 3: Test the Draft Statements with Users.

You'll probably need to go through a few versions of the statement until you're satisfied that the statement reflects your needs and is easy for users to understand.

Step 4: Get Legal and Communications Advice.

You should submit your final statement to your legal counsel and, if appropriate, Communications Branch before finalizing it and loading it on your site. You may also want to get your statement reviewed by the Office of the Information and Privacy Commissioner.

Step 5: Plan for a Review of Your Statement.

Web sites change constantly. In addition to new content, you will likely have new functionality added to your site. In the haste and excitement of growing a site, don't let your privacy statement get forgotten. It is wise to set up a regular review of your privacy statement to ensure that it is still appropriate for both the content and functionality of the site.

Locating Your Privacy Statement on the Site

Every Government of Alberta Web site **must** contain a privacy statement. Because of the importance of the issue, it should not be part of the disclaimers or a legal notices section. A link to the privacy statement **must** be provided from every page of your site.

If you know your clients are sensitive about privacy issues, you may want to consider giving more prominence to your privacy statement on your home page. This practice is being used more and more by both private and public sector organizations to show their commitment to protecting the privacy of users.

If users can conduct transactions on your site (for example, fill out a form or application), you **must** provide a link to a statement that informs the user of your authority to collect the information, and the purpose for which it is collected. The privacy statement should relate to the specific information collected on the form, just as you would on paper-based transactions with clients. In these cases, your site will have a “general” privacy statement that applies to the site, and specific information related to the collection of personal information – your authority to collect it and how it will be used – related to the specific form used in the transaction.

Building Your Privacy Statement

A good privacy statement contains multiple parts. Each part addresses specific concerns of users, or specific aspects of personal information that may be collected, depending on how the Web site is built and operated and how the users use the site.

Use the chart below to determine what parts you need to include in your privacy statement. You'll notice that many of the parts will be appropriate to most sites. These parts are identified with a check mark (☑). Each part is hyperlinked to sample statements that you can use as a starting point. In this way, you can select from the menu of those offered to begin to build a privacy statement that meets your needs.

By using this checklist, you can ensure that your privacy statement reflects both how your site is used and your operational practices.

**Table 1:
Key Parts of a Privacy Statement**

<i>Which of the following situations apply to your Web site?</i>		<i>Build your own privacy statement using these models.</i>
<i>You are primarily posting information and need a broad general privacy statement.</i>	☑	<i>General Privacy Statements</i>
<i>You collect usage statistics automatically.</i>	☑	<i>Information Collected and Stored Automatically</i>
<i>Your site is monitored for security protection.</i>	☑	<i>Security</i>
<i>Your site provides links to other sites.</i>	☑	<i>Privacy and Links to Other Sites</i>
<i>Your site enables visitors to submit information through e-mails and Web forms.</i>	☐	<i>Information Collected in E-mails and Web Forms</i>
<i>Your site includes transactions (e.g. online forms, applications) where personal information enters a system of records in your organization.</i>	☐	<i>Transactions Where Information Enters a System of Records</i>
<i>Users may ask for information about who to contact about your privacy policy.</i>	☑	<i>Getting More Information</i>

General Privacy Statements

[\[Return to Top\]](#)

Web sites can provide a first impression of your organization. A clearly presented general policy on privacy can reassure users that information you collect about them will be handled appropriately.

General privacy statements are appropriate for sites that only post information – where users are browsing, searching and downloading information from your site.

General privacy statements should be written in plain language and tell users what, if any, information is collected when they visit your site. If your site does not use cookies, or other tools for collecting user information, it is wise to state this in the general privacy statement.

Here are two examples of general privacy statements that state the organization's commitment to privacy and the fact the *Freedom of Information and Protection of Privacy Act* applies to the site. The first example also clearly states that “cookies” are not used.

Example 1:

We are committed to providing our visitors with a Web site that respects their privacy. This page summarizes the privacy policy and practices on [NAME OR ORGANIZATION] Web site.

We do not automatically gather any personal information from you, such as your name, phone number, e-mail or address. This information is only obtained if you supply it voluntarily, usually through contacting us via e-mail, or registering in a secure portion of the site.

Any personal information you do provide is managed according to the Alberta Freedom of Information and Protection of Privacy Act. This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected and that you have a right of access to the information.

This Web site does not use “cookies” or any other means of collecting information about you or your computer without your knowledge. (A “cookie” is a file placed on your hard drive by a Web site that allows the Web site to monitor your use of the site, usually without your knowledge.)

Example 2:

Thank you for visiting the [NAME OF ORGANIZATION] Web site and reviewing our privacy policy. Our privacy policy is clear: We will not collect personal

information about you when you visit our Web site unless you choose to provide that information to us.

We do not regularly use "cookies" to track how our visitors use the site. Whenever we enable "cookies" to facilitate your transactions, we will first inform you.

Here is how we handle information about your visit to our Web site: [INSERT APPROPRIATE NOTES].

Information Collected and Stored Automatically

[\[Return to Top\]](#)

Often, information is routinely collected about visitors to assess traffic and usage of a site. Some organizations collect a lot of information during any given session on their site, while others may choose not to. Most have the technical capability to collect information and later take additional steps to identify people (e.g. looking up static Internet Protocol (IP) addresses that may be linked to specific individuals).

Your policy should state clearly what information you are collecting automatically. More importantly, your statement should reflect whether you intend to identify this information with individuals, or use it only for statistical purposes.

If your site is using cookies, the policy should state **how** you are using cookies (e.g. persistent cookies or session cookies.)

Here is an example of a simple statement reflecting the fact that one's IP address is not used to link activity to a particular individual.

Example 1:

We use software that receives and records the Internet Protocol (IP) address of the computer that has contacted our Web site. We make no attempt to link these addresses with the identity of individuals visiting our site.

You may want to be more specific about the type of information that is collected automatically during a visit to the site, as in the following example.

Example 2:

If you do nothing during your visit but browse through the Web site, read pages, or download information, we will gather and store certain information about your visit automatically. This information does not identify you personally. We automatically collect and store only the following information about your visit:

1. *The Internet domain (for example, "xcompany.com" if you use a private Internet access account) and IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access our Web site;*
2. *The type of browser and operating system used to access our site;*
3. *The date and time you access our site;*
4. *The pages you visit; and*
5. *If you linked to the [NAME OF ORGANIZATION] Web site from another Web site, the address of that Web site.*

We use this information to help us make our site more useful to visitors — to learn about the number of visitors to our site and the types of technology our visitors use. We do not track or record information about individuals and their visits.

Of course, not all IP addresses can be tracked to an individual. The following statement reflects this fact.

Example 3:

When you visit the [NAME OF ORGANIZATION] Web site, the Web server automatically collects a limited amount of information essential for the operation and security of our Web site and the other sites that reside on the server. Some of this information (e.g. browser type) does not identify who you are. Other information, such as your Internet domain name or IP address, may identify you depending, in large part, on the naming standards followed by your Internet service provider. You may wish to ask them about their policies and practices in this regard.

The following statement acknowledges that personal information may be collected, but not tracked to the individual. It is based on the vocabulary of the World Wide Web Consortium's Privacy Preferences Project (P3P). A P3P standard is not yet finalized. Because of its technical nature, this type of statement may be more suited to a knowledgeable group of users.

Example 4:

[NAME OF ORGANIZATION] logs http requests to our server. These logs capture computer information and navigation and clickstream data, such as the originating IP (e.g. 204.41.227.10) address of an agent requesting a URL and the email address of the site visitor if they have included it in their browser. This data is used in non-identifiable form for Web site and system administration purposes.

Logged information is not disclosed outside of [NAME OF ORGANIZATION] personnel or those under contract to conduct maintenance to Web server components. The logs are permanently archived as raw research material. The logs may not be accessed, opted out of or changed by server users.

While your practice may be to maintain logs and retain that information, the user may have questions about who has access to that information. Section 40 of the FOIP Act covers the conditions under which a public body may disclose personal information, including instances where there is a legal requirement to disclose the personal information. Even if you intend to use the information internally, there may be cases where you are required to surrender the files. Users should be told of this possibility.

On these issues, it is wise to consult your legal counsel to ensure that the privacy statement accurately reflects **actual** practice or likely practice in the near future.

The following example clearly states that no one will have access to personal information except in cases where you are required to disclose the information.

Example 5:

[NAME OF ORGANIZATION] records your visit and logs the following information for statistical purposes — your server's address; the name of the top-level domain from which you access the Internet (for example, .gov, .com, .ca, .org, etc); the type of browser you use; the date and time you access the site; the pages you have accessed and the documents downloaded and the previous Internet address from which you linked directly to the site.

We will not identify users or their browsing activities, except as required by a law of Alberta or Canada or if we are compelled to produce this information for a legal proceeding.

Cookies are a common method of collecting information about users. If your site uses cookies, you should be explicit about:

- how you are using the cookies,
- how long the cookie will reside on their machine, and
- how the user can reject the cookie or disable this function.

The following example is one that has been reviewed by the Office of the Information and Privacy Commissioner and is currently used on the Travel Alberta Web site. It states that cookies are being used. It describes what a cookie is and how it is used on the site. It also describes how the user can disable the cookie. Finally, it is explicit about how long the cookie will reside on the user's machine.

Example 6:

This Web site uses “cookies.” Cookies are small amounts of information that are distributed to Web browsers to assist you when you return to this site or a specific area on the site. The cookie used here retains session information, or more specifically, the options selected to determine your itinerary. If you have concerns about this, you can change the settings on your Web browser to not accept this information or display warning messages when this is about to occur. Cookies are not retained by the site but reside on your machine and are marked for removal by your browser after a period of 28 days.

The following example is more explicit about how the cookies are used on the site. In this case, the cookie expires 30 minutes after the last time the cookie was modified.

Example 7:

We only enable "cookies" for our searchable Frequently Asked Questions (FAQ) database, and then only for the feature that allows you to register to be notified when a question is modified. A cookie is a small piece of text information that is sent to your browser — along with a Web page — when you access a Web site. Your browser will only return this cookie information to the domain where the cookie originated. No other site can request it.

In the case of our searchable FAQ database, the cookie helps us remember you if you request to be notified of a change of a question. If you choose to disable cookies, you may still request that you be notified when a question is changed, but you will be required to enter your email address for every question you wish to be notified about. The cookie will expire 30 minutes after the last time the cookie was modified. This expiration time does not delete the cookie from your PC, but it does make it invalid and we can no longer use that cookie. No other Web site can use this cookie under any circumstances. If you wish to delete this (or any cookie), that is a function of your Web browser and you should consult the software's Help files.

It may also be helpful to tell people what the impact of disabling the cookie will be, as in the following example.

Example 8:

[NAME OF WEB SITE] does not use persistent cookies (persistent tokens that pass information back and forth from the client machine to the server). We do use session cookies (tokens that remain active only until you close your browser) in order to make the site easier for you to use. We DO NOT keep a database of information obtained from these cookies.

We use cookies in the following ways:

- *To save you time in filling out forms. For example, when downloading high-resolution images, you only have to answer the questions about your type of*

organization and intended use once for each visit to the site. When you close your browser, the cookie is deleted from your computer.

- *To maintain a relationship between the image and the correct link, the program that displays the banners on the bottom of some of our pages uses a session cookie. When you close your browser, the cookie is deleted from your computer.*

You can choose not to accept these cookies and still use the site, but it may take you longer to fill out the same information repeatedly and clicking on the banners will not take you to the correct link. Refer to the help information in your browser software for instructions on how to disable cookies.

Security

[\[Return to Top\]](#)

Government Web sites are monitored to maintain system security. Your privacy statement should contain a statement related to this activity.

The following example notifies the reader of the maintenance of usage logs and how they may be accessed. It also identifies how long the logs are maintained.

Example 1:

For site security purposes and to ensure that this service remains available to all users, this government computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

Except for authorized law enforcement investigations, no other attempts are made to identify individual users or their usage habits.

Privacy and Links to Other Sites

[\[Return to Top\]](#)

One of the advantages of the Web is the ability to link to other information. Almost all provincial government Web sites have links to other government sites as well as non-government sites. In these cases, your privacy statement should contain a notice to the user that if they go to another site from yours, the privacy policy of that site may be different.

The following example states that the organization is not responsible for the privacy policy of other sites that it may be linked to. It also encourages users to look at the privacy policy of sites they visit.

Example 1:

This Web site contains links to other sites. We are not responsible for the content and the privacy practices of other Web sites and encourage you to examine each site's privacy policy and disclaimers and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

Sometimes, your site may warn the user that they are leaving your site. If this is the case, the following example tells the user that you cannot be responsible for the practices of linked sites, but that they will be warned before leaving your site.

Example 2:

Our Web site has links to many other sites. Before leaving the [NAME OF ORGANIZATION] Web site, a page will appear informing you that you are leaving our server. Once you link to another site, you are subject to the privacy policy of the new site. You should review the privacy policy and disclaimers of the new site you are going to.

Information Collected in E-mails and Web Forms

[\[Return to Top\]](#)

Most sites allow the user to e-mail an employee of the department (e.g. “Ask the Expert,” or “Feedback” to the Web master). Many sites also have forms that users can fill out to receive further information, become part of a mailing list or listserv or to join a discussion group.

Almost all of these instances involve the collection of personal information. Your privacy statement should clearly state how this information is to be used, if and how it will be retained, and to whom (and in what form) it may be disclosed.

It is also a good practice to warn the person that, while the information submitted will be protected once it reaches your site, the Internet is not totally secure and that you cannot ensure that the information will be protected during transmission to your site.

In the following example, the use of the personal information submitted is described. It also describes who has access to this information.

Example 1:

If you join an [NAME OF ORGANIZATION] online discussion group, we may ask you to volunteer personal information such as your name and e-mail address for the purposes of effective administration of the discussion group. In some cases, our groups are limited to member-only discussions and as such cannot be accessed by

the general public. We will notify you as to whether you are joining a closed (limited) or open (public) discussion.

Any personal information you supply will not be disclosed to anyone except [NAME OF ORGANIZATION] personnel who need the information, (e.g. to respond to your request).

The following example explains that e-mails are treated the same as letters sent to your organization.

Example 2:

If you choose to provide us with personal information — as in an e-mail to someone else, or by filling out a form with your personal information and submitting it to us through our Web site — we use that information to respond to your message and to help us get you the information you have requested.

We treat e-mails the same way we treat letters sent to [NAME OF ORGANIZATION]. We do not collect personal information for any purpose other than to respond to you. We only share the information you give us with another government department if your inquiry relates to that department.

Moreover, we do not create individual profiles with the information you provide or give it to any private organizations. [NAME OF ORGANIZATION] does not collect information for commercial marketing.

The following example warns the user that information they provide may not be secure before it reaches your site.

Example 3:

Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, you can use another method such as fax or regular mail. For more help, call [NAME OF ORGANIZATION] at [TELEPHONE NUMBER].

Transactions Where Information Enters a System of Records

[\[Return to Top\]](#)

As more and more public bodies use the Internet to carry out transactions with clients, personal information protected by the FOIP Act will be collected. In these instances, it is good practice to conduct a Privacy Impact Assessment.

In cases where traditional paper collections of information are supplemented or replaced by electronic forms offered through a Web site, the rules of the FOIP Act continue to apply.

For situations where a notice is required in the paper-based world, the general principle is that the equivalent notice is required in the online world. You should have a link to the appropriate privacy notice at the point where the information is collected.

In these cases, as with current practices in service delivery that do not involve the Internet, section 33 of the FOIP Act places restrictions on what information may be collected.

Web visitors would probably also like to know how long their personal information is kept.

In the following example, a generic reference to section 33 of the FOIP Act is made. The example also states (in general terms) how the information will be used and how long it will be kept.

Example 1:

The information provided on this application is collected under section 37 of the Alberta Health Care Insurance Act and section 33 of the Freedom of Information and Protection of Privacy Act for the purpose of determining eligibility for the Palliative Care Drug Program. If you have any questions regarding the collection of this information, please contact Customer Services and Registration inquiries at the addresses or phone numbers provided.

Example 2:

We are collecting this personal information to determine and verify your eligibility for assistance programs for post-secondary studies. We do so under the Alberta Students Finance Act, 1980, the Alberta Student Loan Act, 1994, and the Canada Student Financial Assistance Act, 1994. Your personal information is protected by the privacy provisions of the Freedom of Information and Protection of Privacy Act. If you have any questions about the collection of this information you may contact a Career Consultant at your nearest Career Development Centre, or Canada-Alberta Service Centre. Please consult the telephone directory for the centre nearest you.

Example 3:

Any personal information that we ask you to provide via our Web site is collected in compliance with section 33 of the Alberta Freedom of Information and Protection of Privacy (FOIP) Act. We collect only what is necessary for the operation of the Web site and the provision of requested materials to you. The information is used

only for the purpose it was collected or for a consistent purpose. Further, we keep the information only for the length of time necessary to fulfill the purpose for which it was collected.

Getting More Information

[\[Return to Top\]](#)

There may be users that have concerns or questions about your privacy policy. Therefore, it is a good idea to include information about who to contact if the user has questions.

Here are two examples of simple statements that can be used at the end of your privacy statement to help users who may have questions.

Example 1:

For more information about any of the policies described above or about our Web site in general, please contact us:

By e-mail: [E-MAIL ADDRESS]

By telephone: [TELEPHONE NUMBER]

By fax: [FAX NUMBER]

Example 2:

If at any time you have questions about our privacy policy, please notify the Webmaster by email at [E-MAIL ADDRESS].

If you do not wish to send your request using e-mail, you can send it in writing to the following postal address: [INSERT ADDRESS].

Sample Privacy Statements

Here are two sample privacy statements. They were developed to meet specific needs of particular sites. They are included here to give you an idea of how different parts of the privacy statement can be put together to form a cohesive, easy-to-read statement.

Access and Privacy, Service Alberta has developed this site as a resource for public bodies and individuals wanting information about the provincial *Freedom of Information and Protection of Privacy (FOIP) Act*.

We are committed to providing our visitors with a Website that respects their privacy. This page summarizes the privacy policy and practices on Government of Alberta Web sites.

We do not automatically gather any personal information from you, such as your name, phone number, or e-mail address. This information is only obtained if you supply it voluntarily, usually through contacting us via e-mail, or registering in a secure portion of the site.

Any personal information you do provide is protected under Alberta's *Freedom of Information and Protection of Privacy Act*. This means that, at the point of collection, you will be informed that your personal information is being collected, the purpose for which it is being collected and that you have a right of access to the information.

We use software that receives and records the Internet Protocol (IP) address of the computer that has contacted our Web site. We make no attempt to link these addresses with the identity of individuals visiting our site.

We do not regularly use "cookies" to track how our visitors use the site. Whenever we enable "cookies" to facilitate your transactions, we will first inform you.

Visitor information is not disclosed to anyone except Government of Alberta personnel who need the information, e.g. to respond to a request.

This Web site contains links to other sites. We are not responsible for the content and the privacy practices of other Web sites and encourage you to examine each site's privacy policy and make your own decisions regarding the accuracy, reliability and correctness of material and information found.

For questions or comments regarding this policy, or for additional information about the administration of the *Freedom of Information and Protection of Privacy Act*, please visit our Web site at foip.alberta.ca or contact us:

By e-mail: foiphelpdesk@gov.ab.ca

By telephone: 780-427-5848

By fax: 780-427-1120

Privacy commitment

Travel Alberta respects the privacy of our customers. We pledge to never release your personal information (i.e. name, address, telephone number, e-mail address or credit card information) to anyone who is not employed or contracted by us to provide a service to you. We will only use this information to serve you better. Travel Alberta may from time to time, with your permission, send you information we feel will be of use to you. If you prefer not to receive this type of information in the future, just let us know by contacting us (see below) and we will take you off of our mailing list.

Information collected via the Internet

When you visit the Travel Alberta Web site the Web server automatically collects a limited amount of information essential for the operation and security of our Web site and the other sites that reside on the server. Some of this information (e.g. browser type) does *not* identify who you are. Other information, such as your Internet domain name or IP address, *may* identify you depending, in large part, on the naming standards followed by your Internet service provider. You may wish to ask them about their policies and practices in this regard.

Messages sent via the Internet can be intercepted. If you are concerned about sending your personal information to us via the Internet, please call Travel Alberta at 1-800-661-8888 (toll free in North America) or 1-780-427-4321.

Cookies

This Web site uses “cookies.” Cookies are small amounts of information that are distributed to Web browsers to assist you when you return to this site or a specific area on the site. The cookie used here retains session information, or more specifically, the options selected to determine your itinerary. If you have concerns about this, you can change the settings on your Web browser to not accept this information or display warning messages when this is about to occur. Cookies are not retained by the site but reside on your machine and are marked for removal by your browser after a period of 28 days.

What other personal information do we collect and how we use it

Any personal information that we ask you to provide via our Web site is collected in compliance with section 33(c) of the Alberta Freedom of Information and Protection of Privacy (FOIP) Act. We collect only what is necessary for the operation of the Web site and the provision of requested materials to you. The information is used only for the purpose it was collected or for a consistent purpose. Further, we keep the information only for the length of time necessary to fulfill the purpose for which it was collected. Travel survey information is collected, stored and used only in *non-identifying* form.

Links to other Web sites

This site contains links to other tourism related Web sites. We are not responsible for the privacy practices of any sites you may visit after you enter the Travel Alberta site.

Questions?

For more information about any of the policies described above or about our Web site in general, please contact us:

By e-mail: [EMAIL ADDRESS]

By telephone: [TELEPHONE NUMBER]

By fax: [FAX NUMBER]

Glossary

Browser

A client program that is used for looking at various kinds of Internet resources. Netscape and Internet Explorer are two examples of browsers.

A Web browser cache stores the pages, graphics and sounds from Web sites that you visit on your hard drive. When you go back to the page, everything doesn't have to be downloaded all over again. As a result, many users do not realize that some of the pages they have visited, including pictures and text, are now saved on their computer's hard drive.

Clickstream Data

Clickstream data are records of user activity within the site containing information about where visitors went, how they got there, what they did and how long they stayed.

When you surf the Internet, your connection runs through your Internet Service Provider's (ISP) system. A record can be maintained of every Web site, and every page of every Web site, that you access, which news-groups you participate in, which distribution lists you receive, the e-mail addresses of mail you send and receive, and more. Traveling the Internet creates a trail that has been referred to as a clickstream.

Client

A software program that is used to contact and obtain data from a server software program on another computer, often across a great distance. Each client program is designed to work with one or more specific kinds of server programs and each server requires a specific kind of client. A Web browser is a specific kind of client.

Cookie

A "cookie" is a small text file that a Web site can place on your computer's hard drive in order, for example, to collect information about your activities on the site or to make it possible for you to use an online "shopping cart" to keep track of items you wish to purchase. The cookie transmits this information back to the Web site's computer which, generally speaking, is the only computer that can read it. Most consumers do not know that "cookies" are being placed on their computers when they visit Web sites. If you want to know when this happens, or to prevent it from happening, you can set your browser to warn you when a Web site attempts to place a "cookie" on your computer. (*See also "persistent cookie" and "session cookie."*)

Domain Name

The unique name that identifies an Internet site. Domain names always have two or more parts, separated by dots. The part on the left is the most specific, and the part on the right is the most general. A given machine may have more than one domain name, but a given domain name points to only one machine. For example, the following domain names all refer to the same machine:

matisse.net
mail.matisse.net
workshop.matisse.net

Usually, all of the machines on a given network will have the same thing as the right-hand portion of their domain names (matisse.net) in the above examples.

Internet Protocol (IP) Address

A unique number consisting of four parts separated by dots (e.g. 165.113.245.2). Every machine that is on the Internet has a unique IP number. Most machines also have one or more *Domain Names* that are easier for people to remember.

Internet Service Provider (ISP)

A service, usually a private company, that provides Internet access to users. When you surf the Internet, your connection runs through your Internet Service Provider's (ISP) system.

Listserv®

The most common kind of Internet mailing list. Listserv® is a registered trademark of L-Soft International, Inc.

Maillist (Mailing List)

A system that allows people to send e-mail to one address, where their message is copied and sent to all of the other subscribers to the mail list. In this way, people who have many different kinds of e-mail access can participate in discussions together.

Persistent Cookie

A “cookie” that remains on the user’s system after they close down their browser. These cookies can remain for a specified period of time or an indefinite period of time. (*See also “cookie.”*)

Personal Information

The FOIP Act (section 1(n) defines personal information as recorded information about an identifiable individual, including:

- the individual's name, home or business address or home or business telephone number;
- the individual's race, national or ethnic origin, colour or religious or political beliefs or associations;
- the individual's age, sex, marital status or family status;
- an identifying number, symbol or other particular assigned to the individual;
- the individual's fingerprints, other biometric information, blood type, genetic information or inheritable characteristics;
- information about the individual's health and health care history, including information about a physical or mental disability;
- information about the individual's educational, financial, employment or criminal history, including criminal records where a pardon has been given;
- anyone else's opinions about the individual; and
- the individual's personal views or opinions, except if they are about someone else.

Privacy Impact Assessment

The Office of the Information and Privacy Commissioner has developed a Privacy Impact Assessment (PIA) process to assist organizations in reviewing the impact that a new project may have on an individual's privacy.

The process is designed to ensure that the organization evaluates the program or scheme to ensure compliance with Part 2 of the *Freedom of Information and Protection of Privacy Act*.

More information can be obtained at:

www.oipc.ab.ca

Public Bodies

The FOIP Act applies to public bodies. A *public body* is defined in section 1(1)(p) of the Act as:

- a department, branch or office of the Government of Alberta;
- an agency, board, commission, corporation, office, or other body listed in Schedule 1 of the FOIP Regulation;
- the Executive Council Office;
- the office of a member of the Executive Council;
- the Legislative Assembly Office;
- the offices of the Auditor General, the Ombudsman, the Chief Electoral Officer, the Ethics Commissioner, or the Information and Privacy Commissioner; or
- a local public body.

Section 33, The FOIP Act

Section 33 of the Act provides that no personal information may be collected by or for a public body unless:

- the collection of personal information is expressly authorized by an enactment of Alberta or Canada;
- the personal information is collected for the purposes of law enforcement; or
- the personal information relates directly to and is necessary for an operating program or activity of the public body.

Collection occurs when a public body gathers, acquires, receives or obtains personal information. It includes activities where individuals respond through interviews, questionnaires, surveys, polling, or by completing forms in order to provide information to public bodies. There is no restriction on how the information is collected. The means of collection may be writing, audio or video taping, electronic data entry or other such means.

Section 33 of the Act stipulates that collection can take place *by* or *for* a public body. A public body is bound by the requirements of the Act whether it conducts its own collection activities or authorizes an outside agent to carry out the collection. This authorization may be either under contract or through an agreement or arrangement with another public body or private organization.

Examples of organizations and individuals that might collect personal information on behalf of a public body include non-profit support groups such as the John Howard Society, medical laboratories and diagnostic imaging firms, and school counselors.

Section 40, The FOIP Act

Section 40 of the Act lists the **only** circumstances under which public bodies may disclose personal information. It provides for a response to an access request under Part 1, or disclosure on the absence of a formal access request.

The word *only* indicates that disclosures of personal information are limited to the specific circumstances outlined in section 40. If section 40 does not provide authority for a disclosure, the public body cannot disclose the information.

Section 40 *enables* disclosure; it *does not require* disclosure. This is indicated by the word *may* in the introduction to the section. Public bodies should look at the circumstances surrounding each request when deciding whether to disclose personal information. They should also disclose only the information pertinent to the request.

Disclose means to release, transmit, reveal, expose, show, provide copies of, tell the contents of, or give personal information by any means to someone. It includes oral transmission of information by telephone or in person; provision of personal information

on paper, by facsimile copy or in another format; and electronic transmission through electronic mail, data transfer or the Internet. The disclosure may be made:

- to the person whose information it is, either in response to a routine request for information or in response to a FOIP request;
- to an individual's personal representative who is entitled to exercise the rights of that individual under section 84 of the Act;
- to any other person in response to a FOIP request, as a release in the public interest, when the disclosure would not be an unreasonable invasion of privacy, or when section 40 of the Act specifically allows the disclosure; or
- to other public bodies, to legislative, legal and judicial officers, to other levels of government, or to non-government organizations. These disclosures may take place to support the activities of either the public body disclosing the information or the party to which it is disclosed.

Session Cookie

A "cookie" that is erased when the user closes their browser. (*See also "cookie."*)

World Wide Web Consortium's Privacy Preferences Project (P3P)

The Platform for Privacy Preferences Project (P3P), developed by the World Wide Web Consortium, is emerging as an industry standard providing a simple, automated way for users to gain more control over the use of personal information on Web sites they visit.

At its most basic level, P3P is a standardized set of multiple-choice questions, covering all the major aspects of a Web site's privacy policies. Taken together, they present a clear snapshot of how a site handles personal information about its users. P3P-enabled Web sites make this information available in a standard, machine-readable format. P3P enabled browsers can "read" this snapshot automatically and compare it to the consumer's own set of privacy preferences. P3P enhances user control by putting privacy policies where users can find them, in a form users can understand, and, most importantly, enables users to act on what they see.

More information on P3P and its privacy policy generators at www.w3.org/P3P.