

TOWN OF BRIDGEWATER

PRIVACY POLICY

POLICY NO. 120

Introduction

The Town of Bridgewater, hereafter known as ‘the Town’, is committed to protecting the privacy of any individual who interacts with the Town, its employees and services. Part of that commitment is to explain what Personal Information may be collected and why, how it will be used, and who may have access to it.

The Town collects Personal Information for the purposes of administering its programs and services. The Town ensures the protection of Personal Information from unauthorized collection and use. People have the right to access their own information, to request the correction of that information and to file a complaint in regard to the handling of their Personal Information by the Town.

The Town is subject to the [Municipal Government Act](#), the [Freedom of Information and Protection of Privacy Act](#), and the [Personal Information International Disclosure Protection Act](#) of Nova Scotia.

Defining Personal Information

For the purposes of this Policy, “Personal Information” means any information about an individual that is, or can reasonably be, associated with that individual.

The Town may collect, create, record, and use Personal Information in physical and electronic form, and will hold, use, and otherwise process such information as set out in this policy and in accordance with applicable Personal Information protection legislation.

The Town may manage Personal Information because:

- A person provided their information to us.
- A third party, such as service providers or representatives, provided it to us.
- In the case of service providers, an employer provided it.
- It is publicly available.

- It was created or generated by the Town because it was observed or inferred from an individual's interactions with the Town.

The Town only collects Personal Information that it is legally authorized to collect and relates to authorized programs or activities. The Personal Information the Town collects generally consists of information concerning one of the following departments or programs, but not limited to:

- Finance, Administration, Engineering, Community Development, Energize Bridgewater, Public Works, Water Services, Recreational Services, Economic Development, Bridgewater Police Services, Bridgewater Fire Department, and DesBrisay Museum.

Specific questions about what data elements are collected by any Town program or service can be referred to the Town's Privacy Officer.

Collecting Personal Information

Personal Information is generally collected directly from an individual but may also be collected indirectly from third parties.

Where Personal Information is held by a third party, the Town will take reasonable steps to ensure that the third party has represented that they have the authority to disclose the subject individual's Personal Information.

Using Personal Information

Personal Information collected by the Town is used to:

- Communicate with, and, where necessary, confirm information provided by private citizens or their representatives, about the Town activities and initiatives, provide information about new programs, service updates, technical support issues, events, and volunteer opportunities.
- Communicate generally with individuals seeking information on the Town's activities.
- Respond to service requests and provide other service information requested by citizens or contractors.
- Establish, maintain, and manage relationships with individuals who provide Town programs and services.
- Obtain and process payments for programs or services, which includes providing necessary information to the Town's third-party service providers.

- Where applicable, seek reimbursement from insurers.
- Administer municipal operations.
- Maintain information technology security and physical security of facilities.
- Provide educational opportunities for citizens, service providers, partners, and employees.
- Meet the Town's responsibilities to regulators, tax officials, or otherwise meet the Town's legal responsibilities.
- Achieve a specific purpose where the Town has obtained appropriate consent to collect or use personal information for that purpose, including but not limited to, sharing information with third parties that collaborate in the administration of Town programs.

Upon request, the Town will explain the purposes for which the information is being collected. This may be done by contacting the Privacy Officer. The treatment of the Personal Information of prospective, current, and former employees is addressed in our Employee Privacy Policy (Section 10.10 of Personnel Policy). Information about the Personal Information collected in the Energize Bridgewater Home Upgrades (EBHU) Program can be found at <https://www.energizebridgewater.ca/upgrades> , and the Bridgewise Program <https://www.energizebridgewater.ca/bridgewise> .

Disclosing Personal Information

The Town, while conducting its program activities, may share Personal Information with:

- Other government bodies, including law enforcement agencies.
- Service providers, including information technology support service providers.
- Payment processing providers.

The Town does not sell Personal Information to anyone. The Town does not share, transfer, exchange or disclose personal with third parties, except to support the Town's objectives for the purposes stated in "Using Personal Information". The Town only discloses such Personal Information as is necessary for the purposes of a program or service. When applicable and operationally feasible, the Town will seek consent prior to disclosing Personal Information.

In the event of a legal requirement to disclose Personal Information, the Town will disclose Personal Information only when and to the extent legally required. Any disclosure to third party service providers will be done pursuant to agreements setting out the requirements for use, protection, storage, and deletion of such information, or as required by law.

Specifically, the Town may share personal information with its employees, agents, other government institutions, and certain unaffiliated third parties, such as contractors and service providers that need access to such information to assist the Town in meeting the needs of our business and operational activities.

The Town may also disclose Personal Information in an anonymized or de-identified form (i.e., after information has been removed to ensure the identity of any one individual cannot reasonably be ascertained). For example, the Town may share anonymized information publicly to show trends about the general use of our programs and services.

Protecting Personal Information

The Town endeavours to maintain appropriate physical, procedural and technical safeguards with respect to our offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information in our custody. These safeguards also apply to the disposal or destruction of such information.

Measures to keep Personal Information secure include:

- Education and training to relevant staff to ensure they are aware of the privacy and security obligations when handling Personal Information.
- Administrative and Technical measures to restrict access to Personal Information to only those personnel who require access for business reasons.
- Technical security controls, including firewalls, encryption, and anti-virus and endpoint detection and response software.
- Physical security measures to control access to our premises.

Storing & Retaining Personal Information

Currently, Personal Information under the care of the Town is used, accessed, and stored on servers in Canada. In the event the residency of Personal Information, in whole or in part, changes, the privacy statement will be updated.

Whether in Canada or not, Personal Information is subject to the laws of those jurisdictions where it is located and such laws may require disclosure, including to governmental bodies and regulatory agencies. Some jurisdictions may have arrangements or agreements under which information is exchanged with other jurisdictions for law enforcement and other purposes mandated by law.

The Town actively retains Personal Information only if it is required for relationship management or as required by law. When and if this period ends, Personal Information is scheduled for destruction. Depending on the nature of the information and the purpose for which it was collected, this length of time may vary as some data is kept permanently.

Rights to Access, Correct and Delete Personal Information

The Town provides a reasonable right of access and correction and will endeavour to provide personal information in question within a reasonable time. Individuals may be asked for identification so that the Town may verify someone's identity before providing Personal Information.

If documents are required in an alternative format, the Town will make reasonable efforts to provide personal information in that format. If there will be charges associated with the retrieval and provision of requested information, requesters will be advised the charges and their authorization obtained before proceeding with the request.

Access to Personal Information may be declined in certain circumstances. These include where the information requested would reveal confidential information or personal information about someone else or if the Town is permitted or prohibited by legal requirements from disclosing such information.

Upon review of personal information, that individual may request to update or correct the Personal Information that the Town holds. People may also request that Personal Information held by the Town be changed, deleted or its use restricted. If required to delete or erase Personal Information, it will be done in accordance with any applicable operational policy.

Individual Consent

Unless permitted by law, the Town will not collect Personal Information without first obtaining an individual's consent. In the event the Town wants to use information for a new or different purpose and believes consent is required, it will seek further consent to use and disclose that personal information.

However, there may be situations where consent is implied by actions such as actively filling out a form for service or including personal information in an inquiry. By providing Personal Information to the Town in any manner, it is agreed that we may collect, use, disclose or otherwise process your Personal Information in accordance with this Privacy Statement.

Generally, individuals may withdraw their consent for the Town to use their Personal Information. This will mean that your data cannot be used or shared by the Town. If this

happens, this may prevent the Town from providing you with information for our programs or accessing our services. The Town will inform people of the impacts of withdrawing their consent. Please note that there may be circumstances where consent cannot be withdrawn because of legal, regulatory, or contractual requirements. To withdraw consent, contact the Town as described below in “Answering Your Privacy Questions”.

Canadian law permits or requires the use or disclosure of Personal Information without consent in specific circumstances. These circumstances include situations when required by law or necessary to protect the Town, its employees, or others. Should the Town believe it appropriate to disclose Personal Information without consent, it will limit the disclosure of information to what is necessary.

Answering Privacy Questions

Questions, concerns or complaints about how the Town manages or uses Personal Information should be directed to the Privacy and Data Protection Officer:

- By email – Eric.Lawton@Bridgewater.ca
- By mail – Privacy and Data Protection Officer, 60 Pleasant Street, Bridgewater, Nova Scotia B4V 3X9
- By telephone – (902) 930-4834

To escalate concerns if dissatisfied with the Town’s response, contact the Office of the Information & Privacy Commissioner of Nova Scotia; oipcns@novascotia.ca or (902) 424-4684.

Disclaimer & Copyright

The Town is not responsible for any expenses or damages incurred directly or indirectly resulting from the use of this information. Please check with Town staff for the most up to date information. *Please check with the Privacy Officer, should you have questions on the accuracy of this statement.*

The Town makes every effort to ensure that the material provided herein is current and The Town reserves the right to change notices or descriptions without advanced warning.

In the case that information physically available at Town Hall or other Town facilities is in discrepancy with information made available at the website, users of the website are hereby given notice that the physical material located at Town Hall shall govern as correct and overrides material contained within the website. It is always in the best

interest of the viewers of The Town's website, when in doubt, to contact The Town to ensure timely receipt of accurate information.

All the material provided in this website is the sole property of the Town of Bridgewater and cannot be duplicated in whole or in part without the express written permission of The Town or its legal representatives. Duplication in whole or in part constitutes a breach in copyright.

Approved: April 27, 2026 Motion#:26-075