

Deputizing the Private Sector



Office of the Information and
Privacy Commissioner of Alberta

9 Risk Indicators

The ability of individuals to control their personal information is connected to their individual autonomy, dignity and privacy.¹ Individual privacy is affected by programs that require private businesses to collect certain personal information about their customers for later use by government agencies, including law enforcement. Here are nine statements to consider for the collection, use or disclosure of personal information in a new program or proposed legislation.

1 The personal information required to be collected is **more than what the business currently collects about its customers or clients.**



2 The **business has no special experience in protecting personal information** with limited training or expertise in providing necessary security for the additional personal information being collected.

3 The business is **not prohibited from using the additional personal information** for secondary purposes.



4 The business is **not experienced in handling requests from individuals for access to or correction** of their personal information.



5 The collected personal information is **immediately reported to the government, law enforcement or another authority.**

6 A **government, law enforcement or another authority can request access to the collected personal information** without a judicial or other formal process.



7 The collected personal information is **not required to be routinely disposed of** after a defined period of time.



8 The business is **not required to notify individuals when it discloses the personal information** to the government, law enforcement or another authority.



9 There is **no sunset clause for the automatic review of the program** after a defined period of time.