



MEMORANDUM

TO: Mayor Bonnette and Members of Council

FROM: Meagan Cooper, Communications Specialist

DATE: August 9, 2021

MEMO NO.: MEM-ADMIN-2021-0013

SUBJECT: Town of Halton Hills Privacy Policy and Terms of Use

PURPOSE OF THE MEMORANDUM:

The purpose of this memo is to inform Halton Hills Council of the implementation of a cookies banner and subsequent privacy policy and terms of use for the public to acknowledge and accept when using the Town's websites, haltonhills.ca, visithaltonhills.ca & investhaltonhills.com.

BACKGROUND:

Canadian privacy laws require consent to the collection, use and disclosure of personal information. The safest way to obtain permission of online data collection is through express, informed consent which can be achieved through a website cookie banner.

Cookies are stored fragments of data created by a web server and used to improve the browsing experience for the user. A cookie banner often appears across the footer of a website that users will acknowledge, agreeing to the collection of personal data during their visit. Cookie banners are required to inform website users of what data is being collected and how it is being used - ensuring any data collection done by the website provider is transparent and consented to.

With the implementation of a cookie banner, comes the need for an established privacy policy and terms of use for visitors to read prior to consenting to the collection of their personal data. The below proposed privacy policy has been developed with input from Town staff across various divisions including Information Technology Services, Communications and Clerks. Privacy policies and terms of use from surrounding municipalities were also reviewed during development to ensure consistency and best practice.

COMMENTS:

Policy Details

The Town of Halton Hills is committed to protecting the privacy of any personal information you may provide when visiting haltonhills.ca, visithaltonhills.ca or investhaltonhills.com. Our privacy policy complies with the provisions set out in the [Municipal Freedom of Information and Protection of Privacy Act](#). The Town of Halton Hills may change this policy at any time at its sole discretion.

This privacy statement is limited to the Town of Halton Hills Website. The Town assumes no responsibility for the websites that are linked to, hosted by or otherwise electronically connected to the Town's websites or web server.

All Town of Halton Hills' websites use cookies to monitor website traffic and usage mainly through Google Analytics, Site Improve and other online application services. These services collect statistical data that does not identify specific individuals. No information stored in cookies is collected or stored on Town Servers.

- [View Google's policy](#)
- [View Site Improve's privacy policy](#)

All Town of Halton Hills affiliated websites are hosted by a third-party host, eSolutions.

- [View eSolutions privacy policy](#)

Let's Talk Halton Hills

The community feedback platform "Let's Talk Halton Hills" is hosted by a third-party host, Bang the Table. View [Bang the Table's privacy policy](#).

TripSpark (ActiVan)

The ActiVan user portal is hosted by TripSpark Technologies (Trapeze Group Ltd.). View [TripSpark's privacy policy](#).

Collection of Personal Information

When you visit a Town of Halton Hills website, you do so anonymously and are not required to tell us who you are. The Town may ask you for personal information in order to provide requested Town services. When personal information is requested, it is our commitment to provide notice outlining our legal authority to collect it; the purpose for the collection; how the information will be used and who to contact if you have any questions about the collection of personal information. Access is limited to only those

employees who need the information in order to perform their assigned duties. Employees are regularly instructed in their responsibilities in protecting personal information and privacy

All information voluntarily sent to the Town website by email, feedback form or other means becomes the property of the Town of Halton Hills. The Town of Halton Hills does not sell, distribute or share private information with vendor/contractors. This privacy statement is limited to haltonhills.ca, visithaltonhills.ca and investhaltonhills.com.

Recording and Broadcasting of Town Meetings and Events

Town Council and other Town events are recorded and/or live-streamed. If you are a participant or present (in person or virtually), you may be seen and/or heard as part of the broadcast or recording, and your name, comments and/or presentation materials will become part of the public record.

Freedom of Information (FOI)

The Town of Halton Hills endeavors to make its information accessible to the public. Some records, however, contain information that is either privileged or of a personal nature. The Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) compels the municipality to review such documents prior to their disclosure. Request to access such records requires a formal written Freedom of Information request. [View the Town's Freedom of Information webpage.](#)

Disclaimer and Terms of Use

The Town of Halton Hills worldwide websites are provided for information purposes only. The Town of Halton Hills does not accept any responsibility for reliance thereon. The authors publishing on the Town of Halton Hills' websites do not make any representations or warranty, express or implied, including without limitations, as to the quality, merchantability and fitness for the Town of Halton Hills' websites. The Town shall not be liable for any indirect, special, incidental, exemplary, consequential or other damages including lost profits and the user agrees by using Town of Halton Hills worldwide websites to save the Town harmless.

The user of the Town of Halton Hills worldwide websites is responsible for confirming the accuracy of the information contained therein prior to using or relying on the information. The Corporation for the Town of Halton Hills does not accept any responsibility for the accuracy of this information, nor is it responsible for any expenses or damages incurred directly or indirectly resulting from the use of this information. Please check directly with Town staff for the most up to date information.

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

In the case where information available at Town facilities and that of any of the Town of Halton Hills' websites is inconsistent, it shall be deemed that the material located at Town facilities to be current and correct overriding the material contained within the website. It is always in the best interest of the viewers of the Town of Halton Hills' websites to contact the Town of Halton Hills – when in doubt – to ensure timely and accurate information.

Copyright

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CONCLUSION:

As a next step, the Town's website provider, eSolutions, will implement a cookies banner on haltonhills.ca, visithaltonhills.ca & after transition, investhaltonhills.com. The cookies banner will provide a link to a new webpage (to be developed) that will house the Town of Halton Hills Privacy Policy and Terms of Use. Website visitors will get the opportunity to consent to collection of cookies and read the Town's Privacy Policy prior to agreement. The banner will continue to display across the website until users acknowledge it, applying to both returning and new visitors moving forward.

Reviewed and approved by,

A handwritten signature in black ink that reads "Alex Fuller". The signature is written in a cursive, flowing style.

Alexandra Fuller, Director of Communications

A handwritten signature in black ink that reads "C. Mills". The signature is written in a cursive, flowing style.

Chris Mills, Acting Chief Administrative Officer