
Approved by the Board of Elders: November 29, 2022

Purpose:

This policy is to safeguard personal information entrusted to Owen Sound Alliance Church and to comply with the requirements of any and all provincial or federal legislation, such as but not limited to the *Personal Information Protection and Electronic Documents Act* (PIPEDA), any replacement and revisions of PIPEDA, as well as any other provincial legislation and any other applicable legislation.

Privacy Principles:

Owen Sound Alliance Church is committed to maintaining the accuracy, confidentiality and security of all personal information in its possession. The Church, its Board members, officers, employees and volunteers are required to comply with this policy. As part of this commitment, Owen Sound Alliance Church has adopted the following ten principles, based on the values set by the *Canadian Standards Association's Model Code for the Protection of Personal Information* and *Canada's Personal Information Protection and Electronic Documents Act*.

1. Accountability

The Board of Elders and the Senior Pastor of Owen Sound Alliance Church are responsible for the organization's compliance with this policy. Each elder, employee, contract personnel, committee member, and volunteer is responsible for maintaining and protecting the personal information under its control and is accountable, for such information, to the Board of Elders and the Senior Pastor.

2. Identifying purposes

Owen Sound Alliance Church collects and uses personal information about individuals solely for the following purposes:

- a. To provide income tax receipts;
- b. To register and provide consent for children and youth to attend age appropriate programming and events;
- c. To meet all Plan to Protect requirements for employees and volunteers, including, but not limited to, ministry volunteer application forms and background checks;
- d. Short Term Mission Trips applications;
- e. To enable communication by Elders and Staff within their scope of duties with all those attending the church. Communication methods includes, but are not limited to, email, phone, and regular mail.
- f. To meet statutory and regulatory requirements.

Any other use of personal information, such as church telephone or photo directories, shall only be used by explicit written consent of the individual.

Business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

The only circumstance under which personal information may be disclosed to third parties is for the fulfillment of any purposes identified above, or as required by law.

Where personal information is disclosed to third parties for the fulfillment of any purposes identified above, the church will make all reasonable efforts to ensure that the third party has appropriate security procedures in place for the protection of the personal information being transferred.

3. Consent

Personal information provided on official church forms constitutes consent for the Church to collect, use and disclose personal information for the purposes stated in this policy, unless the provision on such forms to withdraw consent is clearly indicated subject to legal and contractual restrictions and reasonable notice.

The choice to provide Owen Sound Alliance Church with personal information is always the individual's. Decisions to withhold particular information may impact one's ability to meet specific requirements for the provision of certain services.

An individual may refuse consent by clearly indicating on any form where personal information is provided, or withdraw consent at any time by contacting the Privacy Office. The Privacy Officer will explain the options and any consequences of refusing or withdrawing consent, and will record the individual's choice.

4. Limiting collection

The personal information the Church collects shall be limited only to that which is necessary for the purposes identified.

5. Limiting use, disclosure and retention

The personal information the Church collects will only be used or disclosed for the purposes for which it was collected, unless an individual has consented or when it is required or permitted by law. Personal information will be retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

A formal written request may also be made to the Privacy Officer to permanently dispose of their personal information providing that doing so does not inhibit the completion of any obligation under which the personal information was given, or violate any federal or provincial laws.

6. Accuracy

Owen Sound Alliance Church will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. If an individual finds any inaccuracies in our information, they should immediately inform the Church and the appropriate corrections shall be made promptly. In some cases, the Church relies on the individual to ensure that certain information, such as a mailing address, email address and telephone number, is current, complete and accurate.

7. Safeguards

Owen Sound Alliance Church uses appropriate security safeguards to protect personal information, including those of minors, from risks such as loss, misuse, unauthorized access, disclosure, or alteration. Safeguards include physical, administrative, and electronic security measures. All employees, contract personnel, elders and volunteers of the Church are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behaviour, and must follow applicable laws and regulations. In the course of daily operations, access to personal information is restricted to those employees, contract personnel and volunteers whose job responsibilities require them to access it.

8. Openness

Owen Sound Alliance Church will provide information to individuals about our policies and procedures relating to the overall management of personal information that is under our control or with regard to specific personal information about which an individual may have a concern. Arrangements can be made with the Privacy Officer to access this information.

9. Access

An individual has the right to access their personal information under the control of the Church. Upon request to the Privacy Officer in writing by email or regular mail at the church address, the individual will be informed of the existence, use, and disclosure of their personal information and will be given access to the information. In certain exceptional situations, the Church may not be able to provide access to certain personal information that it holds about an individual. For example, the Church may not provide access to personal information if doing so would reveal personal information about a third party. If access cannot be provided, Owen Sound Alliance Church will notify the individual, in writing, of the reasons for refusal.

10. Handling enquiries and complaints

Any questions or enquiries concerning compliance with our privacy policies and procedures may be addressed to the Privacy Officer by telephone, email or by regular mail at the church mailing address.

11. Revisions to this policy

The development of the Owen Sound Alliance Church's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology, legal requirements and legislative law, the Church may revise this policy from time to time. For a copy of the current version please contact the church office or visit the Church's website and click on the Resources page.