

St. Andrew's Presbyterian Church, Guelph Privacy Policy

Approved by the Session - November 2005

Purpose

This policy is to safeguard personal information entrusted to St. Andrew's Presbyterian Church, Guelph (hereinafter, "St. Andrew's") and to comply with the requirement of the Personal Information Protection and Electronic Documents Act (PIPEDA) and any other applicable legislation.

Privacy Principles

St. Andrew's is committed to maintaining the accuracy, confidentiality, and security of all personal information in its possession. The Church, its Session and Board of Managers, officers, employees and volunteers are required to comply with this policy. As part of this commitment St. Andrew's 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

At St. Andrew's, the Session as a whole is responsible for the organization's compliance with this policy. Each team, employee and volunteer is responsible for maintaining and protecting the personal information under its control and is accountable for such information to the Session. In the future, it may be deemed appropriate to seek out an individual from within the organization to act as a Privacy Officer.

2. Identifying Purposes

St. Andrew's collects and uses personal information about individuals solely for the following purposes:

- a. to enable communication
- b. to provide income tax receipts
- c. to meet statutory and regulatory requirements
- d. to register people for events and activities
- e. to provide security and risk management information.

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, St. Andrew's 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

Unless we hear otherwise, provision of personal information on official church forms, constitutes consent for St. Andrew's to collect, use and disclose personal information for the purposes stated in this policy.

An individual may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The choice to provide us with personal information is always that of the individual. Decisions to withhold particular information may impact one's ability to meet specific requirements for the provision of certain services.

An individual may refuse or withdraw consent by contacting the Church Office at 519-822-4772 or at mailbox@standrewsguelph.com. The Church Administrator 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 St. Andrew's collects shall be limited only to that which is necessary for the purposes identified.

5. Limiting Use, Disclosure and Retention

The personal information St. Andrew's 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 it is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

6. Accuracy

St. Andrew's 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 inform us and we will make the appropriate corrections promptly. In some cases, St. Andrew's relies on the individual to ensure that certain information such as mailing address, email address and telephone number, is current, complete and accurate.

7. Safeguards

St. Andrew's uses appropriate security safeguards to protect personal information from risks such as loss, misuse, unauthorized access, disclosure, or alteration. Safeguards include physical, administrative, and electronic security measures.

All employees and volunteers of St. Andrew's 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 and volunteers whose job responsibilities require them to access it.

8. Openness

St. Andrew's 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.

Contact the Church Administrator at 519-822-4772 or at mailbox@standrewsguelph.com to access this information.

9. Access

An individual has the right to access their personal information under the control of St. Andrew's. Upon request in writing to the Session at the address listed below, 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, St. Andrew's may not be able to provide access to certain personal information that it holds about an individual. For example, St. Andrew's may not provide access to personal information if doing so would reveal personal information about a third party. If access cannot be provided, St. Andrew's 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 initially by the Church Administrator who may decide to pass the enquiry on to the Session. Both may be contacted by telephone at 519-822-4772, by email at mailbox@standrewsguelph.com or by regular mail at 161 Norfolk Street, Guelph, ON N1H 4J8.

11. Revisions to this policy

The development of St. Andrew's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, St. Andrew's may revise this policy from time to time. For a copy of the current version please contact the Church Office at the above numbers and addresses.