APPENDIX 1.5

PERSONAL INFORMATION PRIVACY POLICY

General

At Grace United Church, Sarnia, ON., a community of faith of The United Church of Canada within the Antler River Watershed Regional Council, we understand that personal privacy is a critical issue for our members, adherents, donors, and employees. This privacy policy outlines our principles and procedures regarding the confidentiality and security of personal information given to us by members, adherents, donors, and employees.

Scope

This policy applies to Grace United Church, Sarnia, ON., a community of faith of The United Church of Canada. It outlines the principles and commitments we make to our members, adherents, donors, and employees, to protect their personal information.

Definitions

“Personal Information” includes any factual or subjective information, recorded or not, which can lead directly or indirectly to identification of an individual. Personal information does not include the name, title, business address / telephone / email of an employee of an organization.

“Collection” is the act of gathering, acquiring, or obtaining personal information from any source, by any means.

“Consent” involves voluntary agreement with what is being done or proposed. Consent may be expressed in writing, or verbally, or tacitly. Implied consent exists when the church can reasonably infer consent based upon the action of the member, adherent, donor or employee.

“Member” and “Adherent” (for the purposes of this policy) means anyone who makes use of the services, programs and activities of Grace United Church.

“Donor” means anyone who contributes financial resources to Grace United Church.

“Employee” means anyone who contributes their time and talent to the work of Grace United Church, whether on a paid, contract or voluntary basis. *This definition not applicable to the definition of employee under any other statute or law or common law or for any other purpose.*

“Disclosure” is the act of making personal information available to others.

“Use” is the treatment and handling of personal information by and within Grace United Church.

“Third Party” is an individual or organization other than Grace United Church and its members, adherents, donors, and employees.

Section 1: The Accountability of Grace United Church

1.0. Grace United Church is accountable for the protection of the private information of members, adherents, donors, and employees.

1.1. The overall responsibility of the protection of personal information, and compliance with this Privacy Policy rests with the Grace United Church Privacy Officer.

1.2. This United Church community of faith is committed to ensuring that appropriate security measures are used in the transfer of sensitive private information. When using email or wireless communication, we advise members, adherents donors and employees that complete confidentiality and security are not assured.

1.3. Grace United Church is not accountable for any damages suffered when a member, adherent, donor or employee transmits personal information through email or wireless communication, or when Grace United Church transmits such information at the request of the member, adherent, donor or employee.

1.4. Grace United Church has developed policies and procedures to: protect personal information; receive and respond to complaints and inquiries; train staff regarding the policies and procedures; communicate the policies and procedures to our members, adherents, donors and employees.

Section 2: Identifying the Purposes of Personal Information

2.0. Grace United Church will communicate the purposes for which information is being collected, either orally or in writing.

2.1. Grace United Church collects personal information for the following reasons only:

- To provide information for church programs and services
- To maintain donor records and issue charitable tax receipts
- To maintain adequate stewardship or care for our human and financial resources
- To provide services that will meet the spiritual, educational, and human needs of our members, adherents, donors, and employees
- To adequately promote the mission and outreach services of both our community of faith and the larger United Church
- To verify the identity of a member, adherent, donor, or employee
- To provide for the transfer of appropriate records to our Regional Archives for archival and research purposes

Section 3: Consent from Members, Adherents, Donors, and Employees

3.0. Grace United Church will obtain consent from members, adherents, donors, and employees for the collection, use, or disclosure of any personal information except where detailed in this Privacy Policy. We will make reasonable efforts to ensure that members, adherents, donors, and employees will understand how their personal information will be used and disclosed.

3.1. The consent of a member, adherent, donor or employee can be written, spoken, or implied. For example, consent may be expressed by means of a check-off box on a paper form, expressed over the telephone, or expressed by filling out a contact form on a website. A member can

withdraw consent at any time, but such withdrawal may also inconvenience the member, adherent, donor, or employee (i.e. charitable tax receipts, or employee pension or earnings statements). If such information is required by law, the community of faith may decline to deal with a member, adherent, donor, or employee who has withdrawn their consent to the required information.

3.2. Grace United Church may collect, use, or disclose personal information without the member, adherent, donor or employee's knowledge or consent in the following exceptional circumstances:

- When such collection, use or disclosure is permitted or required by law
- When using such information is required in an emergency that threatens an individual's life, health, or personal security
- When certain information is publicly available
- When we require legal advice from a lawyer
- When we need to collect a debt from a member, adherent, donor, or employee
- When we need to deal with an anticipated breach of law

Section 4: Limits for Collecting Personal Information

4.0. Grace United Church will collect personal information only for the purposes identified. We will use methods that are lawful, and will not collect information indiscriminately.

Section 5: Limits for Using, Disclosing and Keeping Personal Information

5.0. Personal information will be used or disclosed only for the purposes for which it was collected. If such information is to be used for additional purposes, we will seek new consent to do so.

5.1. Grace United Church will not sell membership, adherent, or donor lists to Third-Parties.

5.2. Grace United Church may occasionally use membership, adherent, or donor lists to conduct surveys in order to provide better programs and services, or to do research for future planning.

5.3. Grace United Church may send membership, adherent, and donor lists to other offices of the United Church in order that they may provide information for Broadview subscriptions, or in order that our General Council or Regional offices may send out information on issues of stewardship, outreach, and other concerns of our larger church.

5.4. Grace United Church will transfer records to the Regional Archives in order that the long-term legal and business purposes of the church, and its archival and research purposes can be continued with appropriate care. The majority of personal information is not preserved at the Archives, but some records are archival in their nature and will be preserved.

5.5. Grace United Church may contract with Third-Parties for storage of personal information, via cloud services or other technology. Grace United Church expects such parties to adhere to their policies, procedures and security requirements to protect the personal information.

Section 6: Accuracy

6.0. Grace United Church will make reasonable efforts to ensure that any personal information collected is accurate, complete, and current. In most cases, it will rely on the members,

adherents, donors and employees to keep certain information current, complete, and accurate.

6.1. Members, adherents, donors, and employees may request amendments to the records at Grace United Church, in order to ensure the accuracy and completeness of their personal information. If the amendment request pertains to information that remains in dispute, the community of faith will note the person's opinion in the file.

Section 7: Safeguarding Personal Information

7.0. Grace United Church is committed to the safeguarding of the personal information of members, adherents, donors, and employees in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use, or modification.

7.1. Depending on the sensitivity of the personal information, Grace United Church may employ appropriate security measures to protect the information. The measures may include, for example, the physical security of offices, locked filing cabinets, and electronic security measures such as computer passwords and security software.

7.2. Grace United Church will use appropriate security measures when disposing of personal information, computers no longer in use, and other storage devices. This will, for example, involve the shredding of paper records containing personal information, and the reformatting of computers and storage systems no longer in use.

Section 8: Availability of Policies and Procedures

8.0. Grace United Church is open about the policies and procedures it uses to protect the personal information of members, adherents, donors and employees. Information about these policies and procedures will be made available in written format in plain language. However, to ensure the integrity of our security procedures, we may refuse to publicly disclose certain information.

8.1. Grace United Church will make the following information available:

- The name, title, and address of the Privacy Officer who can respond to requests for information on personal information policies and procedures, and to whom complaints or inquiries can be forwarded (see Section 12.0);
- A description of the type of personal information held by Grace United Church, including a general account of its use;
- A copy of any brochures or other information that explain the policies and procedures; and
- An explanation of what personal information is made available to related organizations within the United Church.

Section 9: Providing Access to Personal Information

9.0. Members, adherents, donors, and employees have a right to have access to their personal information held by Grace United Church. Upon request, the church will, within a reasonable time period, tell the member, adherent, donor, or employee what personal information it has, what it is being used for, and to whom it has been disclosed if applicable and within the time period for which records are available.

9.1. Members, adherents, donors, or employees may be asked to be specific about the information they would like to have access to, and to submit their request in writing to the Privacy Officer of the community of faith (see section 12.0).
9.2. Members, adherents, and donors will be required to provide personal information to identify themselves to enable Grace United Church to provide an account of the existence, use, and disclosure of personal information.
9.3. The information will be made available at a reasonable cost that will vary with the type and amount of information requested. If the information is extensive, the community of faith will inform the member of the cost, and request further direction from the individual as to whether or not the Community of faith should proceed with the request.
9.4. If a request for information is refused, the community of faith will notify the individual in writing, documenting the reasons for refusal and resources for redress available to the member, adherent, donor or employee. These reasons may include that it is unreasonably costly to provide; that the information could threaten the security of another individual; that it was information generated in a formal dispute resolution process; that the information contains references to other individuals; that the information cannot be disclosed for legal or security reasons; or that it is information that is subject to solicitor-client or litigation privilege.
9.5. If the information is demonstrated to be inaccurate or incomplete, Grace United Church will amend the information as required.

Section 10: Compliance and Complaints

10.0. Members, adherents, donors or employees are to direct any complaints, concerns, or questions regarding this privacy policy in writing to the Privacy Officer of Grace United Church. If the Privacy Officer is unable to address the individual's concerns, the issue can be referred to an appeal committee made up of the Chair of Council, a member of the Ministry and Personnel Committee, and one of the ministry personnel in the community of faith. If any of the individuals in these positions are in conflict regarding the individual making the complaint, they should be excused from participation in the appeal committee and a substitute should be appointed by Council.

Section 11: Revisions to this Policy

11.0. The development of the Grace United Church's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, the Church may revise this policy from time to time. For a copy of the current version please contact the Grace United Church Privacy Officer.

Section 12: Request for Access to Personal Information Form

Person making request:

Name: _____

Address: _____

_____

Phone: _____

Signature: _____ Date: _____

Description of Personal Information:

_____

_____

_____

Reason for request:

_____

_____

_____

Privacy Officer Signature: _____ Date: _____

Date copy of Personal Information returned (if applicable): _____

Privacy Officer: Office Administrator
Grace United Church
990 Cathcart Blvd
Sarnia, ON N7S 2H2
519-542-1203
office@graceucsarnia.com

Note: A $15.00 fee may apply for request of duplicate marriage or baptism certificate.