

**First Christian Reformed Church-London**  
**Protection of Personal Information Policies and Procedures**

**1. Introduction**

- 1.1. The First Christian Reformed Church of London intends to comply with all applicable laws and is committed to protecting the privacy of its members, adherents, donors, volunteers, employees, directors, officers and any other persons about or from whom the Church collects personal information. The Church embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information to ensure that all personal information is properly collected, used only for purposes for which it is collected and is disposed of in a safe and timely manner when no longer required.
- 1.2. This Policy applies to Personal Information which is collected, used or distributed by the Church for commercial purposes.

**2. Definitions**

- “Church” is defined as the First Christian Reformed Church
- “Individual” is defined as any member, adherent, associate member, donor, volunteer, employee, director, officer, elder, pastor, and any other person who has dealings with the Church.
- “Personal Information” is defined as any information about an Individual that the Church collects, processes or uses.
- “Collector” is defined as any Individual who receives Personal Information on behalf of the Church.
- “Policy” is defined as the First Christian Reformed Church Protection of Personal Information Policies and Procedures.

**3. Accountability**

- 3.1. The Church is responsible for maintaining and protecting the personal information under its control. The Church has appointed Barb Morrison as its Privacy Officer.
- 3.2. They may be contacted as follows:

Name: Barbara Morrison  
c/o First Christian Reformed Church

Address: 507 Talbot Street  
LONDON, Ontario  
N6A 2S5

Phone: (519) 432-7997  
Fax: (519) 432-7613  
E-mail: [firstcrc@skynet.ca](mailto:firstcrc@skynet.ca)

- 3.3. Collectors of Personal Information shall be accountable for such information to the Privacy Officer.
- 3.4. Any Personal Information that is transferred to a third party for processing is subject to this policy. The Church shall use contractual or other appropriate means to provide a level of protection of the Personal Information that is comparable to this policy while the information is being processed by a third party.

- 3.5. The Church shall communicate and explain this Policy and provide training with respect thereto to all persons who may be in a position to collect, retain or use Personal Information.
- 3.6. The Church shall prepare and disseminate information explaining the Policy to Individuals.

#### **4. Identifying Purposes**

- 4.1. The Church collects and uses personal information for a variety of purposes including:
  - providing services to individuals ministered to by the Church;
  - establishing and maintaining membership lists including sufficient information to meet Denominational needs;
  - managing payroll and benefits for Church employees;
  - maintaining employment records including employee performance evaluations;
  - and
  - establishing and maintaining lists of donors.
- 4.2. The Church shall identify the purposes for which it collects personal information.
- 4.3. The purpose of collecting Personal Information shall be disclosed to the Individual from whom the Personal Information is being collected before or at the time the information is collected.

#### **5. Consent**

- 5.1. Consent will be obtained from the Individual whose Personal Information is collected, used and disclosed, unless obtaining the consent would be inappropriate or not required by law. In some cases a person's consent may be implied by virtue of their membership in the Church or because of the person's conduct with the Church.
- 5.2. When it is appropriate, written consent will be obtained. Written consents will be kept on file for as long as the information is reasonably necessary.
- 5.3. The Church shall ensure that there is no condition attached to the supply of benefits requiring an Individual to provide consent for the collection, use, or disclosure of Personal Information beyond that required to fulfill the explicitly specified and legitimate purposes.
- 5.4. An Individual may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice, where required.
- 5.5. If an Individual wishes to withdraw consent, he or she must provide explicit instructions in writing to the Privacy Officer. The Privacy Officer will then determine whether any Personal Information about the person is in the Church's possession or control. If so, the Individual shall be informed of any reasonable foreseeable implications of withdrawing consent.

#### **6. Limiting Collection**

- 6.1. Personal Information collected will be limited to that required for the purpose or purposes identified by the Church. The Church is committed to collecting personal information in a fair, open and lawful manner.

#### **7. Limiting Use, Disclosure and Retention**

- 7.1. Personal Information shall not be used, disclosed or retained for purposes other than those for which it was collected, except with the consent of the Individual or as required by law.
- 7.2. All collected Personal Information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by the law. Nothing in this Policy prevents the elders, deacons or pastoral staff from collecting, retaining and using information related to individuals ministered to by the

Church, since such information assists in providing quality services to those ministered to.

## **8. Accuracy**

- 8.1. Personal Information, whether in electronic or paper-based format, shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purposes for which it was collected.

## **9. Safeguards**

- 9.1. Personal Information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding includes physical measures such as locked filing cabinets and premises security, organizational measures such as restricted access to files with personal information or technological measures such as security software.
- 9.2. The Church shall ensure that any person having access to Personal Information entrusted to the Church is made aware of the importance of maintaining confidentiality of the information.
- 9.3. The Church shall ensure that care is taken when Personal Information is disposed of or destroyed to prevent unauthorized parties from gaining access to the information.

## **10. Openness**

- 10.1. The Church shall be open about the Policy, as well as any related practices or procedures that are not explicitly set out in the Policy.
- 10.2. Information that will be made available to Individuals upon request shall include:
  - the name and contact information of the Privacy Officer;
  - the means of gaining access to Personal Information held by the Church;
  - a description of the type of Personal Information held by the Church, including a general account of its use;
  - a copy of any written information that explains the Church's policies, standards or codes regarding Personal Information; and
  - what Personal Information is made available to related organizations.

## **11. Access to Personal Information**

- 11.1. The Church will grant an Individual access to Personal Information about themselves where the Church is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contacts.
- 11.2. In order to access Personal Information, a written request must be made to the Privacy Officer.
- 11.3. Once a written request has been made by an Individual the Church shall:
  - inform the Individual whether the Church holds Personal Information about the Individual;
  - allow the Individual access to Personal Information about the Individual;
  - advise the Individual of the use that has been made or is being made of the Personal Information; and
  - provide an account of the third parties to which the Personal Information has been disclosed.
- 11.4. If the Church believes that access to Personal Information should be denied to an Individual, for any reason, the Church shall consult legal counsel before allowing access to any Personal Information.

- 11.5. The Church shall ensure that when an Individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, the Church amends the information as required.

## **12. Challenging Compliance**

- 12.1. Complaints or inquiries about the collection, use, disclosure or retention of Personal Information or the Church's compliance with these ten principles should be directed to the Privacy Officer in writing.
- 12.2. Upon receipt of a complaint or inquiry from a person, the Privacy Officer shall deliver a copy of this Policy to the person.
- 12.3. Upon receiving a complaint or enquiry from a person, the Privacy Officer will investigate, ensure that appropriate measures are taken if necessary, and advise the person as to the Privacy Officer's findings and any corrective actions taken.
- 12.4. Upon receiving the response from the Privacy Officer, the person who filed the complaint may, if he or she is not satisfied, appeal to the Council for an independent evaluation and response with respect to the complaint.
- 12.5. The determination of the Council shall be final and the Privacy Officer shall abide by and implement any of its recommendations.

## **13. Conditions**

- 13.1. This Privacy Policy is subject to amendment in response to developments in Privacy Legislation, and in particular, the anticipated introduction of Provincial privacy legislation.
- 13.2. The Privacy Officer will review and recommend changes to this policy to Church Council from time to time and notification of any changes will be posted on the Church's internet web site and will be available at the Church office.
- 13.3. Any changes in the Privacy Policy will apply to personal information collected from the date of the posting of the revised Privacy Policy on the Church's internet web site.

Last Modified

January 11, 2005