



**Revised:** November 4<sup>th</sup>, 2021

## **1 Purpose**

- 1.1. This Privacy Policy is Grant Memorial Church Inc.'s ("GMC") commitment to the protection of any personal information that is disclosed to GMC. It was created to ensure GMC preserves the confidentiality, accuracy and security of this information. These principles guide GMC in the collection, use, retention and disclosure of all personal information.

## **2. Definitions**

- 2.1. What is personal information?
  - a. This includes information such as name, address, telephone number, date of birth and social insurance number.
  - b. It also includes credit card, email address, facsimile and banking information.

## **3. Collection and Use of Personal Information**

- 3.1. The information that is collected enables us to process and/or develop:
  - a. donation receipts;
  - b. child abuse registry checks;
  - c. police checks;
  - d. a database from which we maintain our volunteer program;
  - e. employee files;
  - f. communication; and
  - g. relationship building.
- 3.2. GMC will ask permission and inform as to why the information is being collected. In some instances, where the purpose for collection is obvious, a person's consent is implied. Personal information will only be used for the purposes identified when express consent was obtained.

## **4. Disclosure of Personal Information**

- 4.1. GMC does not provide or exchange personal information to other organizations without consent. Personal information is a vital part of our ongoing relationship with Church attendees. Personal information will only be disclosed:
  - a. on a confidential basis, to obtain a child abuse registry check or a police check;
  - b. if the disclosure is required or permitted by law; or
  - c. if an individual requests or consents to the disclosure.

- 4.2. Consent for the use of personal information can be withdrawn at any time, upon reasonable notice to GMC. The implications of withdrawal will be communicated. GMC may retain information for audit and archival purposes.

## **5. Maintaining and Safeguarding Personal Information**

- 5.1. GMC strives to ensure that security measures protect personal information against unauthorized access, loss, deletion or alteration. This includes limiting access to those employees who have a signed Disclosure of Personal Information. This also includes the use of individual sign-up procedures for program registration, which are stored in a secure location, prohibiting personal information from being displayed publicly.

## **6. Limiting Use, Disclosure and Mandatory Breach Reporting**

- 6.1. We recognize our legal obligations to protect the personal information we have gathered about individuals. We have therefore made arrangements, including arrangements with our outsourced service providers as mentioned above, to secure against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. These arrangements may include physical security measures, network security measures, and organizational measures such as non-disclosure agreements and need-to-know access.
- 6.2. In the unfortunate event that the Church suffers a loss of personal information, or unauthorized access to or disclosure of personal information, the Church will notify any affected individuals as required by law and the Office of the Privacy Commissioner of Canada.

## **7. The Role of the Privacy Officer**

- 7.1. GMC's Privacy Officer is the point of contact, if any matters regarding the use of personal information needs to be raised. The Privacy Officer is responsible for monitoring information collection and data security, and ensures that other staff members receive appropriate training on privacy issues and their responsibilities under the code. The Privacy Officer also handles all privacy inquiries and personal information access requests under the code.
- 7.2. Ultimate responsibility for our compliance with the Policy rests, however, with the Lead pastors, senior management team and directors of GMC.

## **8. Access Your Personal Information**

- 8.1. When requesting information, a reasonable amount of time (14 days) must be allowed to respond to a request. There is no cost for above requests unless a number of copies of records are required. GMC will advise of any costs prior to copying those records. GMC may not be able to provide access to personal information where the information cannot be separated from the records of others, cannot be disclosed for reasons of security or is protected by legal privilege.

## **9. Questions and Concerns**

- 9.1. GMC is committed to continuous improvement and values input. We strive to ensure that the information collected, used and disclosed is accurate and up to date. A Privacy Officer has

been appointed to ensure that all employees comply with the following 10 Principles for the Protection of Personal Information:

- a. **Accountability:** GMC is responsible for maintaining and protecting the personal information under its control. GMC has designated a Privacy Officer who is responsible to ensure that the church complies with its privacy obligations in accordance with applicable privacy laws.
- b. **Identifying Purposes:** Before or at the time personal information is requested, the purposes for which it will be used or disclosed will be identified.
- c. **Consent:** A person's knowledge and consent for the collection, use or disclosure of personal information is required.
- d. **Limiting Collection:** The collection of personal information is limited to only the purposes identified.
- e. **Limiting Use, Disclosure and Retention:** Personal information will be used or disclosed only for the purpose to which consent has been given (or as required by law.) The information will be retained only for as long as necessary to fulfill identified purposes.
- f. **Accuracy:** The information will be kept accurate, complete and up-to-date, as new information is provided.
- g. **Safeguards:** Personal information will be protected with appropriate security safeguards: i.e. physical measures, technological tools, and organizational controls.
- h. **Openness:** Specific, understandable information will be made readily available regarding GMC's personal information policies and practices.
- i. **Individual Access:** When requested, access will be given to the existence, use and disclosure of a person's information. That person is entitled to question its accuracy and completeness, and its uses.
- j. **Challenging Compliance:** A person whose records are held by GMC is entitled to question the Privacy Officer about our compliance with any of these principles.

## 9.2. Complaints about Compliance

- a. Upon receiving the response from the Officer, the person who filed the complaint may, if they are not satisfied, appeal initially to the organization's Senior Management Team and then, secondly, to the GMC Board of Trustees to review and determine the disposition of the complaint at issue.
- b. The determination of the GMC Board of Trustees shall be final and the Officer shall abide by and implement any of its recommendations.

9.3. If an attendee would like to review their own personal information, correct or revise existing information, or if any questions, concerns or comments regarding this Privacy Policy or its application have been raised, please contact the Privacy Officer by email at: [privacy@grantmemorial.ca](mailto:privacy@grantmemorial.ca), or by mail at: 877 Wilkes Avenue, Winnipeg, MB, R3P 1B8, Attention: Privacy Officer.