



simplechurches is committed to ensure the protection of personal information that we collect, use or disclose. We will inform individuals of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Commitment outlines the principles and practices we will follow in protecting individual's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of individual's personal information and allowing individuals to request access to, and correction of, their personal information.

Our Privacy Commitment concerns personal information about identifiable individuals, including our employees and volunteers. This can include an individual's name, age, home address and phone number(s), email address(s), gender, marital status, photo, medical information and involvement in our programs. In the case of employees and volunteers, it can also include social insurance numbers, and employment history. Contact information that would allow you to contact our employees during working hours is not covered by this Privacy Commitment.

## **Policy 1– Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the individual voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We collect, use and disclose personal information for a variety of reasons, all of which serve the individual or the simplechurches community. This information enables us to serve the individual and to provide a safe environment for individuals and the families. We will only collect individual's information that is necessary to fulfill the following purposes:
  - To create and distribute a Church Directory to members and adherents;
  - To maintain a contact list for pastors and support staff;
  - To provide lay-empowered leaders access to personal information so as to administer their ministries;
  - To send information to members and adherents;
  - To register and care for children and youth in ministry events;
  - To provide financial statements and Income Tax receipts for those who support simplechurches ministries financially;
  - To transact and manage pre-authorized gifts to simplechurches approved ministries.

## **Policy 2 – Consent**

- 2.1 We will obtain an individual's consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, on website or through an authorized representative, including:
  - When you submit an offering envelope. Personal information on the offering envelope or cheque is provided with your consent to use that information for our records;
  - When you register online for a simplechurches user account;
  - When you submit a pre-authorized form for automatic deposits to simplechurches
  - When you complete and submit an information form;
  - When you voluntarily provide personal information either orally or in writing, if it is reasonable that a person would voluntarily provide that information;

•When you register into any activity that invites you to provide selected information

Consent can also be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the individual voluntarily provides personal information for that purpose.

- 2.3 We may collect, use or disclose personal information without the individual's knowledge or consent only in an emergency that threatens an individual's life, health, or personal security or when to do so is permitted or required by law.

### **Policy 3 – Using and Disclosing Personal Information**

- 3.1 We will only use or disclose an individual's personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.
- 3.2 We will not use or disclose an individual's personal information for any additional purpose unless we obtain consent to do so.

### **Policy 4 – Retaining Personal Information**

- 4.1 If we use an individual's personal information to make a decision that directly affects them, we will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it.
- 4.2 Subject to the above, we will retain an individual's personal information only as long as necessary to fulfill the identified purposes or a legal or administrative purpose.

### **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that individual's personal information is accurate and complete where it may be used to make a decision about the individual.
- 5.2 Individuals may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the individual's correction request in the file.

### **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that personal information is appropriately protected:
- The use of locked filing cabinets;
  - The use of user ids, passwords, encryption, firewalls;
  - Restricting employee access to personal information as appropriate (i.e. only those that need to know will have access)

- 6.3 When destroying personal information, we will use appropriate security measures such as shredding paper documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 – Providing Access to Personal Information**

- 7.1 Individuals have a right to access their personal information, subject to limited exceptions, including but not limited to disclosure that would reveal personal information about another individual, and certain circumstances raising health and safety concerns.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 We will make the requested information available within 30 working days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.4 If a request is refused in full or in part, we will notify the individual in writing, providing the reasons for refusal and the recourse available to them.

### **Policy 8 – Questions and Concerns: The Role of our Privacy Officer**

- 8.1 Our Privacy Officer is responsible for ensuring simplechurches compliance with this policy and the *Personal Information Protection Act* of British Columbia.
- 8.2 We invite you to direct any concerns or questions regarding our compliance with this Privacy Commitment to our Privacy Officer, Andy Lambkin (andy@simplechurches.ca). If our Privacy Officer is unable to resolve your concern, you may also write to the Information and Privacy Commissioner of British Columbia.