

## **FLEETWOOD CHRISTIAN REFORMED CHURCH**

### **GENERAL PRIVACY POLICY**

#### **OUR COMMITMENT TO PRIVACY AND OUR PRIVACY PRACTICES**

Fleetwood CRC is committed to protecting the privacy, confidentiality and security of the personal information of Fleetwood CRC's members, supporters and other stakeholders. Fleetwood CRC values the trust of those Fleetwood CRC deals with and recognizes that maintaining that trust requires that Fleetwood CRC be transparent and accountable in how Fleetwood CRC treats the information that you provide to Fleetwood CRC.

During the course of Fleetwood CRC's various activities, Fleetwood CRC frequently gathers and uses personal information. Anyone from whom Fleetwood CRC collects such information should expect that it will be carefully protected and that except as otherwise legally required or permitted any use or other dealing with this information is subject to consent. Fleetwood CRC's privacy practices are designed to achieve this.

Personal information gathered by Fleetwood CRC is kept in confidence. Fleetwood CRC staff are authorized to access personal information based only on their need to deal with the information for the reasons for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. Fleetwood CRC also takes measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed.

This policy is based on the *Ten Privacy Principles* contained in the Canadian Standards Association (CSA) Model Code for the protection of personal information and on which the relevant privacy legislation is founded. Fleetwood CRC has tailored its own ten privacy principles in compliance with the relevant privacy legislation to meet the specific needs and expectations of its stakeholders.

#### **SCOPE OF POLICY**

This policy applies to personal information of individual stakeholders in the possession and control of Fleetwood CRC. This policy does not apply to employee and volunteer personal information. The Fleetwood CRC Employee and Volunteer Privacy Policy covers this information. This policy also does not apply to information collected, used or disclosed with respect to corporate or commercial entities that deal with Fleetwood CRC. Corporate and commercial information is protected by other policies and practices of Fleetwood CRC and through contractual arrangements.

This policy does not apply to the collection, use or disclosure of your contact information or publicly available information by Fleetwood CRC.

## DEFINITIONS

In this policy:

**“business contact information”** means information to contact a person at a place of business, including the person’s name, position, business address, business telephone number, business e-mail address and business fax number.

**“Church Order”** means the Church Order of the CRCNA, as amended from time to time.

**“collection”** means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

**“consent”** means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is clear and does not require any inference on the part of Fleetwood CRC. Implied consent exists when Fleetwood CRC can reasonably infer consent based upon your action or inaction.

**“CRCNA”** means the Christian Reformed Church in North America denomination of which Fleetwood CRC is a member.

**“CRCNA AGENCIES”** means the agencies and ministries of the CRCNA, as constituted from time to time.

**“disclosure”** means making personal information available to others outside of Fleetwood CRC.

**“personal information”** means information about an identifiable person that is recorded in any form but does not include his or her business contact information. Personal information includes a person’s age, gender, race, ethnic origin, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, travel history, consumer preference information, personal habits, personal interests and personal history. Personal information does not include information that cannot be associated with a specific person.

**“privacy officer”** means a person designated by Fleetwood CRC who is accountable for compliance with this policy by Fleetwood CRC and whose contact information is set out at the end of this policy.

**“third party”** means a person or organization other than Fleetwood CRC and you.

**“use”** means the treatment and handling of personal information by and within Fleetwood CRC

**“Fleetwood CRC”** means the Fleetwood Christian Reformed Church which operates a church at

Surrey, BC.

“**you**” means a member, supporter and anyone else for whom Fleetwood CRC collects personal information, except for employees and volunteers of Fleetwood CRC for whom Fleetwood CRC has a separate privacy policy.

## **1. Fleetwood CRC ACCOUNTABILITY**

Fleetwood CRC is accountable and responsible for personal information under its control, including information that has been transferred to a third party. In cases where such transfers take place Fleetwood CRC will ensure that the third party has comparable privacy safeguards in place. Fleetwood CRC has designated a privacy officer to ensure compliance with this policy.

Ultimate accountability for Fleetwood CRC compliance rests with the Board of Directors of Fleetwood CRC who delegates day-to-day accountability to the privacy officer. Other persons within Fleetwood CRC may be accountable for the day-to-day collection and processing of personal information or may act on behalf of the privacy officer.

Fleetwood CRC will adopt policies, procedures and practices to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies, procedures and practices and communicate policies, procedures and practices to you.

## **2. IDENTIFYING THE PURPOSES OF PERSONAL INFORMATION**

When collecting personal information Fleetwood CRC will orally or in writing state the purpose of collection and will provide, on request, contact information for the privacy officer who can answer questions about the collection.

Fleetwood CRC may collect your personal information for the following purposes:

- § to provide and administer religious and other related products and services through Fleetwood CRC;
- § to provide administrative services through Fleetwood CRC;
- § to assess applications for membership in Fleetwood CRC by prospective members;
- § to contact members, supporters and other stakeholders regarding resource materials and other products and services of Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;
- § to contact members, supporters or other stakeholders for special events, promotions, fund raising and other similar matters, which are directly or indirectly beneficial to Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;

- § to administer religious and other related policies, procedures and practices of Fleetwood CRC ;
- § to thank and publicly recognize members, supporters and other stakeholders;
- § to provide members, supporters and other stakeholders with information about how donated funds are used by Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;
- § to keep members, supporters and other stakeholders informed about the activities of Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;
- § to promote opportunities for members, supporters, potential supporters and other stakeholders to support Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;
- § to establish and maintain lists of members, supporters or other stakeholders;
- § to conduct surveys or research;
- § to publish a directory;
- § to compile statistical and historical information about members, supporters and other stakeholders;
- § to establish and maintain subscriptions to publications of Fleetwood CRC, the CRCNA and the CRCNA AGENCIES;
- § to build and maintain relationships among stakeholders within Fleetwood CRC;
- § to disclose information requested by third parties (with permission of members, supporters and other stakeholders);
- § to protect Fleetwood CRC, you and others from fraud and error and to safeguard the interest of Fleetwood CRC and its staff and representatives;
- § to authenticate your identity;
- § to ensure staff and contractors comply with their agreements and legal obligations to Fleetwood CRC;
- § to administer relations with the provincial, state and federal authorities, the CRCNA, the CRCNA AGENCIES and other organizations with whom Fleetwood CRC has relations from time to time;
- § for activities and proceedings under the Church Order;

- § to comply with Canada Revenue Agency requirements for gift processing;
- § to comply with any legal or regulatory requirement; and
- § to use and disclose for any other purpose directly or indirectly related to establishment or operation of Fleetwood CRC.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with Fleetwood CRC.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is permitted or required by law.

### **3. CONSENT**

Fleetwood CRC will obtain your consent to collect, use or disclose personal information except where Fleetwood CRC is permitted or required by law to do so without consent. For example Fleetwood CRC may collect, use or disclose personal information without your consent where:

- § Fleetwood CRC reasonably expects that obtaining consent would compromise an investigation or proceeding;
- § Fleetwood CRC's use of the information is for acting in an emergency that threatens a person's life, health or personal security;
- § Fleetwood CRC is obtaining legal advice; or
- § Fleetwood CRC needs to deal with an anticipated breach of law.

Fleetwood CRC will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed.

Your consent may be express or implied and may be given through an authorized representative such as a lawyer or agent. If you are under the legal age, your consent may be obtained from a parent or guardian.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. Fleetwood CRC may imply consent if the purpose for the collection of the information would be reasonably obvious to you and is given voluntarily by you for that purpose. Consent may also be implied where Fleetwood CRC notifies you that Fleetwood CRC

intends to collect, use or disclose information and you do not decline Fleetwood CRC's intended action within a reasonable period of time. The manner in which Fleetwood CRC obtains consent for the collection of personal information will vary with the sensitivity of the information being collected.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided that Fleetwood CRC is given reasonable written notice. Fleetwood CRC will inform you of the likely consequences of the withdrawal of consent, which may include the inability of Fleetwood CRC to provide certain products or services to you.

#### **4. LIMITS FOR COLLECTING PERSONAL INFORMATION**

Fleetwood CRC will only collect personal information that is reasonably necessary to provide a product or service either directly or indirectly and which is reasonably necessary for the purposes to which you consented. Fleetwood CRC will collect personal information by lawful means. Fleetwood CRC may also collect information as permitted or required by law.

#### **5. LIMITS FOR USING, DISCLOSING AND KEEPING PERSONAL INFORMATION**

Your personal information will only be used or disclosed for the purpose for which it was collected. Fleetwood CRC will not use personal information for any additional purpose unless Fleetwood CRC seeks your consent to do so.

Fleetwood CRC may periodically use your personal information to conduct surveys in order to enhance Fleetwood CRC's provision of products or services.

Fleetwood CRC will not sell member, supporter or other stakeholder lists or personal information to third parties.

Subject to applicable legal requirements, Fleetwood CRC, the CRCNA and the CRCNA AGENCIES may transfer information between each other. The CRCNA and/or the CRCNA AGENCIES will only use or disclose your personal information in accordance with the policies, procedures and practices of Fleetwood CRC except where the CRCNA and/or the CRCNA AGENCIES are permitted or required by law to do otherwise. The CRCNA and/or the CRCNA AGENCIES will only use or disclose your personal information for the purposes for which it was collected and to assist the CRCNA and/or the CRCNA AGENCIES in carrying out duties on behalf of Fleetwood CRC except where the CRCNA and/or the CRCNA AGENCIES are permitted or required by law to do otherwise.

Fleetwood CRC will retain your personal information only so long as necessary for the identified purposes or for necessary legal or business purposes. Fleetwood CRC will keep your personal information used to make a decision affecting you for at least one year after using it to make the decision. Fleetwood CRC will also keep personal information that is the subject of a request by you for as long as is necessary to allow you to exhaust recourse with respect to this personal

information. Once Fleetwood CRC no longer has a reason to retain your personal information, Fleetwood CRC will destroy, erase or make anonymous documents or the records containing personal information.

## **6. ACCURACY**

Fleetwood CRC will make reasonable efforts to ensure your personal information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, Fleetwood CRC will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

Fleetwood CRC will not routinely update your personal information unless it is necessary to fulfill the purposes for which it was collected. You may request amendments to the records at Fleetwood CRC to ensure the accuracy and completeness of your personal information. If the amendment request relates to information that remains in dispute, Fleetwood CRC will note your opinion on the file.

## **7. SAFEGUARDING PERSONAL INFORMATION**

Fleetwood CRC is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

Depending on the sensitivity of your personal information, Fleetwood CRC will employ appropriate security measures to protect the information. The measures may include, for example, the physical security of offices and data centres, the limiting of access on a “need-to-know” basis and the use of passwords and encryption.

Fleetwood CRC will also use appropriate security measures when disposing of your personal information.

Fleetwood CRC will require the CRCNA and the CRCNA Agencies and other third parties through contractual or other reasonable means to safeguard your personal information entrusted to them in a manner consistent with the policies, procedures and practices of Fleetwood CRC.

## **8. AVAILABILITY OF POLICIES AND PROCEDURES**

Fleetwood CRC is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing. To ensure the integrity of our security procedures and business methods, Fleetwood CRC may refuse to publicly disclose certain information.

Fleetwood CRC will make the following information available:

- § The name, title and address of the person accountable for the policies, procedures and practices and to whom complaints or inquiries can be provided;
- § A description of the type of personal information held by Fleetwood CRC, including a general account of its use;
- § A copy of any brochures or other information that explain the policies, procedures and practices; and
- § An explanation of what personal information is made available to related organizations.

## **9. PROVIDING ACCESS TO YOUR PERSONAL INFORMATION**

You have a right to access your personal information held by Fleetwood CRC. Upon request and confirmation of your identity, Fleetwood CRC will, within a reasonable period of time, tell you what personal information it has, what it is being used for and to whom it has been disclosed. You may be asked to be specific about the information that you would like to access and to submit your request in writing. Depending on the type and amount of information requested, Fleetwood CRC may charge you a reasonable fee for providing you with access to your information. Where you will incur a cost, Fleetwood CRC will inform you of the cost and request your direction on whether or not Fleetwood CRC should proceed with the request.

Fleetwood CRC will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, Fleetwood CRC may not be able to provide access to certain personal information. The reasons for not providing this information may include that it is information that would threaten the life or security of another person, information generated in a formal dispute resolution process, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons and information that is subject to solicitor-client privilege.

If a request is refused, Fleetwood CRC will notify you in writing, setting out the reasons for the refusal and resources for redress available to you.

If your personal information is demonstrated to be inaccurate or incomplete, Fleetwood CRC will amend the information as required. Where appropriate Fleetwood CRC will send the amended information to third parties to whom the information has been disclosed.

## **10. COMPLIANCE AND COMPLAINTS**

Fleetwood CRC will, on request, provide you with information regarding its complaint response procedure.

You are to direct any complaints, concerns or questions regarding this policy in writing to the privacy officer. If the privacy officer is unable to address your concern, the issue can be referred to the Board of Directors of Fleetwood CRC. At any point in this process you may also write to the Privacy Commissioner.

Contact Information:

Privacy Officer  
9165 - 160 Street  
Surrey, BC V4N 2X7  
Phone: 604-588-6244  
Fax: 604-584-6294  
E-mail: [info@fleetwoodcrc.org](mailto:info@fleetwoodcrc.org)