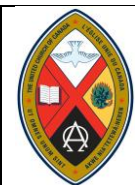


GLEN MORRIS UNITED CHURCH

PRIVACY POLICY

Robert Williams-Chair of Official Board

1/21/2021

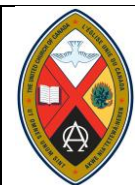


**Glen Morris United Church
Privacy Policy**

January 2021

Contents

DEFINITIONS.....	2
ACCOUNTABILITY	3
COLLECTING PERSONAL INFORMATION	3
ACCURACY OF INFORMATION	3
THE PURPOSES FOR COLLECTING PERSONAL INFORMATION	4
SECURITY OF RECORDS	4
CONSENT	5
ACCESS TO PERSONAL INFORMATION.....	6
PRIVACY OFFICER OF GMUC	6
COMPLAINTS PROCEDURE.....	7
AVAILABILITY OF GMUC POLICIES.....	7



Glen Morris United Church Privacy Policy

January 2021

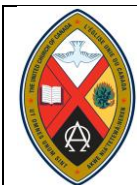
Glen Morris United Church (GMUC) is committed to protecting the privacy, confidentiality, accuracy, and security of personal information that is collected, used, retained and disclosed in compliance with all federal and provincial legislation. This includes, but is not limited to the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The United Church of Canada has determined that this federal act applies to the church and its pastoral charges, and as a result GMUC is obliged to implement its provisions.

This policy outlines the principles and commitments GMUC makes to its ministry personnel, members, adherents, donors, and employees to the following three main issues:

1. The way GMUC collects, uses, retains, protects and discloses personal information;
2. The right of individuals to access and amend personal information about themselves; and
3. A complaints procedure for individual to follow.

DEFINITIONS

1. "Collection" is the act of gathering, acquiring or obtaining personal information from any source, by any means.
2. "Consent" involves voluntary agreement with what is being done or proposed. Implied consent exists when the church can reasonably infer consent based upon the action of the member, adherent, donor or employee.
3. "Disclosure" is the act of making personal information available to others.
4. "Donor" means anyone who contributes financial resources to the work of GMUC.
5. "Employee" means anyone who contributes their time and talent to the work of GMUC, whether on a paid or voluntary basis. This definition includes a volunteer solely for purposes of this policy and the PIPEDA, and is not applicable to the definition of "employee" under any other statute or common law or for any other purpose.
6. "Personal information" includes any factual or subjective information, recorded or not, about an identifiable individual which can directly or indirectly identify the individual. "Personal information" includes information in any form (paper or electronic) including but not limited to: home address, home phone or cell number, age, personal e-mail address, race, national or ethnic origin, colour, religion, sexual orientation, gender, marital status, social status, mental or physical disability, family members names', employee files and evaluations, SIN number, credit card / bank records, loan records, donation information, medical conditions or records, income, legal documentation, employee evaluations, employee disciplinary actions, existence of disputes and comments . Personal information does not include the following: a person's business name, business title, business address, business e-mail address and business phone number.
7. "Third Party" is an individual or organization other than GMUC, and its members, adherents, donors and employees.
8. "Use" is the treatment and handling of personal information by and within GMUC.



Glen Morris United Church Privacy Policy

January 2021

ACCOUNTABILITY

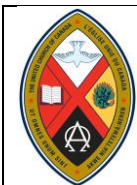
- 1 GMUC is accountable for the protection of the private information of members, adherents, donors and employees.
- 2 The overall responsibility of the protection of personal information, and compliance with this Privacy Policy rests with the GMUC Official Board.
- 3 This Privacy Policy contains procedures to protect personal information; receive and respond to complaints and inquiries about personal information; and communicate the contents of this policy to members, adherents, donors and employees.
- 4 GMUC is not accountable for any damages suffered when a member, adherent, donor or employee transmits personal information through e-mail or wireless communication, nor when GMUC transmits such information at the request and with the consent of members, adherents, donors or employees.

COLLECTING PERSONAL INFORMATION

1. GMUC only uses methods that are lawful, and will not collect information indiscriminately.
2. GMUC will collect personal information only for the purpose for which it is required.

ACCURACY OF INFORMATION

- 1 GMUC will make reasonable efforts to ensure that any personal information collected is accurate, complete, and current. It will rely on members, adherents, donors and employees to keep their information current, complete and accurate.
- 2 Members, adherents, donors and employees may request amendments to the records in order to ensure accuracy and completeness of their personal information. If information is demonstrated to be inaccurate or incomplete, the information will be amended as required. If the amendment request pertains to information that remains in dispute, a note of the person's opinion shall be added to the file.



Glen Morris United Church Privacy Policy

January 2021

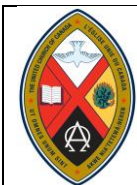
THE PURPOSES FOR COLLECTING PERSONAL INFORMATION

GMUC collects member personal information for the following reasons only:

- To provide information for church information lists, photo-directories, 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

SECURITY OF RECORDS

1. GMUC is committed to safeguarding the personal information of members, adherents, donors and employees in order to prevent loss, theft, unauthorized access, disclosure, duplication, use, or modification.
2. Depending upon the sensitivity of personal information, GMUC will employ appropriate security measures to protect the information. The measures may include physical security of offices, locked filing cabinets, locked and fireproof safes, electronic measures such as complex passwords and lockbox online security.
3. Only those individuals authorized to have access to personal information files are allowed to see those files. The personal information can only be used for the purpose for which it was collected.
4. GMUC will not sell membership, adherent or donor lists to Third Parties.
5. GMUC may occasionally use membership, adherent or donor lists to provide better programs and services, or to do research for future planning.
6. GMUC may send membership, adherent or donor lists to other offices of the United Church of Canada in order that they may provide information for United Church Observer subscriptions, or in order that the General Council or Regional Council may send out information on issues of stewardship, outreach and other concerns of our larger church.
7. Personal information that is no longer required should be destroyed, in accordance with records retention policy of the United Church of Canada, and authorization of the GMUC Official Board. Paper records should be destroyed using a cross cut shredder; computer files must be deleted completely.
8. Records with permanent value may be deposited with WOW Regional Council Archives. Records to be sent to these archives must be approved by the Official Board.

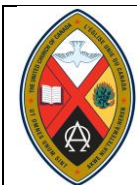


Glen Morris United Church Privacy Policy

January 2021

CONSENT

1. GMUC will obtain consent from members, adherents, donors, and employees for the use or disclosure of any personal information except where detailed in this Privacy Policy. The church will make reasonable efforts to ensure that members, adherents, donors, and employees will understand how their personal information will be used and disclosed.
2. The consent of a member, adherent, donor or employee can be written, spoken, or given electronically. Oral, spoken consent can be used for the most minimally sensitive level of personal information only. 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. GMUC 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 GMUC requires legal advice from a lawyer
 - When GMUC needs to collect a debt from a member, adherent, donor, or employee
 - When GMUC needs to deal with an anticipated breach of law

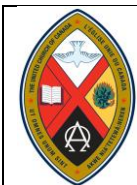


ACCESS TO PERSONAL INFORMATION

1. Individuals have a right to have access to their personal information held by GMUC, upon written notice. Individuals may also give written permission to someone else to view their information. Those requesting information will be required to provide identification that they are authorized to receive the information. Requests should be made in writing to the GMUC Privacy Officer. A reasonable fee may be charged based upon the type and amount of information requested. Upon the request being received; identification being provided and any applicable fee paid, the church shall, within 30 days provide the information requested.
2. Information held in baptismal, marriage and burial registers is considered personal information collected for a specific purpose, and is held in sacred trust. Information held in these registers has a specific retention period governed by provincial legislation eg: for baptism registry information that period is 100 years. In cases where the person is unable to request the record (eg: due to dementia), their power of attorney may request the information on their behalf. Information in these registers cannot be transferred to any other organization, be microfilmed or copied.
3. GMUC has the right to refuse a request for access to personal information if:
 - the information is protected by solicitor – client privilege
 - the information was generated in a formal dispute resolution process
 - the information would reveal confidential information about another person
 - the information may threaten the safety or security of another person
 - the information contains confidential financial or health information

PRIVACY OFFICER OF GMUC

1. The Privacy Officer of GMUC is the Chair of the Official Board. In the event the Chair of the Official Board is placed in a conflict of interest, then the Chair of the Session shall act as the Privacy Officer.
2. The role of the Privacy Officer is to:
 - Understand the importance and compliance of the GMUC Privacy Policy,
 - Cooperate in response to requests from individuals, Regional Council and the Archives Department of the United Church of Canada,
 - Report to the Official Board on matters related to the GMUC Privacy Policy eg: audits of security measures instituted for paper and computer records.
 - Investigate and opine on alleged breaches of confidentiality of personal information, and subsequently provide a report to the Official Board.
 - Receive and investigate written complaints, concerns or questions regarding the personal information of an individual.
 - Refer a matter to the Executive of the Official Board in the event a complaint, concern, or question cannot be resolved by the Privacy Officer alone. See Complaints Section.



Glen Morris United Church Privacy Policy

January 2021

COMPLAINTS PROCEDURE

- Members, adherents, donors or employees should initially direct any complaint, concern or question regarding a privacy matter to the church representative holding the database in question. The issue may be able to be resolved within the GMUC Privacy Policy guidelines.
- If there is no resolution, then the individual should submit the complaint, concern or question in writing to the Privacy Officer of GMUC.
- If the Privacy Officer is unable to resolve the individual's issue, it can be referred to the Executive of the Official Board as an appeal. If any of the members of the Executive are in a conflict of interest regarding the individual raising the issue, they shall be excused from participation in the appeal, and a substitute member of the Official Board appointed. Alternatively, a full member of another community of faith may be brought in to help with the deliberations.
- If the appeal process does not resolve the issue, the complainant is encouraged to write to the Privacy Office of the United Church of Canada.

AVAILABILITY OF GMUC POLICIES

GMUC is open and transparent about its policies and procedures including this Privacy Policy. Information about this policy shall be made available to the congregation, employees and ministry personnel, upon request.

GMUC will make available the following information:

- The name of the GMUC Privacy Officer, who can respond to requests for information about personal information policies, procedures, and to whom inquiries and complaints may be forwarded.
- Brochures or other information to explain the GMUC Privacy Policy.
- Copies of the GMUC Privacy Policy, upon request.