

<b>Policy Name:</b>	<b>Privacy Policy</b>				
<b>Section #:</b>	EL-1	<b>Section Title:</b>	Treatment of Individuals	<b>Issued:</b>	November 2020
<b>Approval Authority:</b>		<b>Adopted:</b>	November 2020	<b>Reviewed:</b>	
<b>Accountable Executive:</b>	Lead Pastor	<b>Revised:</b>			
<b>Accountable Department:</b>	Administration	<b>Contact:</b>	Privacy Officer		

### **Purpose**

This policy is designed to safeguard the personal information entrusted to Riverwood Church Community (Riverwood) and to comply with the requirements of the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and any other applicable legislation.

### **Privacy Principle**

Riverwood is committed to maintaining the accuracy where practicable, confidentiality and security of all personal information in its possession. Riverwood, its Elders Board members, officers, employees and volunteers are required to comply with this policy. As part of this commitment Riverwood has adopted the following ten principles based on the values set by the Canadian Standards Association's *Model Code for Protection of Personal Information* and Canada's Personal Information Protection and Electronic Documents Act.

### **Accountability**

Riverwood's Privacy Officer is responsible for the organization's compliance with this policy. Each board, committee, employee and volunteer is responsible for maintaining and protecting the personal information under its control and is accountable for such information, to the Privacy Officer.

### **Purpose of Personal Information**

Riverwood collects and uses personal information about individuals for the sole purpose for which it was intended and collected.

Business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories and printed on business cards are not considered personal information.

The only circumstance under which personal information may be disclosed to third parties is for the purpose for which it was intended or as required by law. Where personal information is disclosed to third parties for its intended purpose, Riverwood will make all reasonable efforts to ensure that the third party has appropriate security procedures in place for the protection of the personal information being transferred.

### **Consent**

Unless otherwise instructed, provision of personal information on official church forms either physically or electronically, constitutes consent for Riverwood to collect, use and disclose personal information for the purposes stated in this policy.

An individual may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The choice to provide Riverwood with personal information is always the individual's.

Decisions to withhold particular information may impact one's ability to meet specific requirements for the provision of certain services.

An individual may refuse or withdraw consent by contacting the Privacy Officer at any time. The Privacy Officer will explain the options and any consequences of refusing or withdrawing consent, and will record the individual's choice.

### **Limiting Collection**

The personal information Riverwood collects shall be limited only to that which is necessary for the purposes for which it was collected. Information collected in relation to minors must have the express consent of the parent and/or guardian of said minor.

### **Limiting use, disclosures and retention**

The personal information Riverwood collects will only be used or disclosed for the purposes for which it was collected, unless an individual has consented or when it is required by law. Personal information will be retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

### **Accuracy**

Riverwood will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. If an individual finds any inaccuracies in the information, they should inform Riverwood and the appropriate corrections will be made promptly. In some cases, Riverwood relies on the individual to ensure that certain information, such as mailing address, email address and telephone number is current, complete and accurate.

### **Safeguards**

Riverwood uses appropriate security safeguards to protect personal information from risks such as loss, misuse, unauthorized access, disclosure, or alteration. Safeguards include physical, administrative, and electronic security measures. Disposal of information will be in accordance with legislation.

All employees and volunteers of Riverwood are required to abide by the privacy standards established by Riverwood. They are also required to work within the principles of ethical behavior, and must follow applicable laws and regulations. In the course of daily operations, access to personal information is restricted to those employees and volunteers whose ministry and/or administrative responsibilities require them to access it.

### **Openness**

Upon request, Riverwood will provide information to individuals regarding the policies and procedures that govern the overall management of personal information under its control. Furthermore, Riverwood will provide information regarding the application of these policies and procedures to specific personal information about which an individual may have a concern. The Privacy Officer may be contacted for this information.

### **Access**

An individual has the right to access their personal information under the control of Riverwood. Upon a request in writing to the Privacy Officer, the individual will be informed of the existence, use and disclosure of their personal information and will be given access to the information. In certain exceptional situations, Riverwood may not be able to provide access to certain personal information that it holds regarding an individual. For example, Riverwood may not provide access to personal information if doing so would reveal personal information about a third party where it would be unlawful or put an individual(s) at risk. If access cannot be provided, the Privacy Officer will notify the individual in writing of the reasons for refusal.

### **Complaints**

Any questions or concerns regarding Riverwood's privacy policies and procedures or the application thereof should be addressed to the Privacy Officer. If a satisfactory resolution is not found, the Complaint Mechanism Policy may be invoked.