

# GRANT MEMORIAL BAPTIST CHURCH, CITY CHURCH OF WINNIPEG, LINDENHOLM MINISTRIES INC. AND LINDEN CHRISTIAN SCHOOL PRIVACY POLICY

In accordance with applicable laws, Grant Memorial Baptist Church, Linden Christian School and Lindenholtm Ministries Inc. and City Church of Winnipeg (the "organization") is committed to protecting the privacy of its members, adherents, donors, volunteers, students, alumni parents, faculty and staff, employees, residents, directors, officers and any other person about or from whom the organization collects personal information. The organization embraces the principles of the *Personal Information Protection and Electronic Documents Act* (PIPEDA) to ensure that all personal information is properly collected, used only for the purposes for which it is collected and is disposed of in a safe and timely manner when no longer required.

## What is considered personal information?

Personal information is any information that can be used to distinguish, identify or contact, as specific as an individual's name, address, birth date, email address and phone number. As a regular course of business, it may be provided to those who provide us with contracted services. We verify that these companies adhere to the relevant privacy legislation. Personal identifiers will not be rented or sold to any third party without approval.

## 1. Accountability

The organization is responsible for maintaining and protecting the personal information under its control. The organization has appointed Privacy Officers who are responsible to ensure that the organization complies with its privacy obligations in accordance with applicable privacy laws.

## 2. Identifying Purposes

The organization collects and uses personal information for a variety of purposes including but not limited to:

- providing services to individuals served by the organization;
- establishing and maintaining members lists and/or membership history; and
- purchases, registrations, donations and preferred payment methods.

The organization shall identify and explain the purposes for which it collects personal information to the person from whom the personal information is being collected before or at the time the information is collected.

## 3. Consent

Consent will be obtained from the person whose personal information is collected, used and disclosed, unless obtaining the consent would be inappropriate or not required by law.

Sometimes, the person's consent may be implied by virtue of his or her membership or registration in the organization or because of the person's involvement within the organization. When it is appropriate, written consent will be obtained.

Written consents will be kept on file for as long as the information is reasonably necessary. A person may withdraw his or her consent, in writing, at any time, subject to legal or contractual restrictions and reasonable notice. The person will be informed of reasonably foreseeable implications of the withdrawal.

#### **4. Limiting Collection**

Information collected will be limited to that required for the purpose or purposes identified by the organization. The organization is committed to collecting personal information in a fair, open and lawful manner.

#### **5. Limiting Use, Disclosure and Retention**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. All personal information collected shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. Nothing in this Privacy Policy prevents the leadership within the organization from collecting, retaining and using information related to individuals served by the organization.

#### **6. Accuracy**

Personal information shall be maintained as accurate, complete and up to date as necessary in order to fulfill the purposes for which it was collected.

#### **7. Safeguards**

Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding could include physical measures such as locked filing cabinets and premises security, organizational measures such as restricted access to files with personal information or technological measures such as security software. Our employees are committed to respecting the personal information we hold in our records.

#### **8. Openness**

Information regarding the privacy policy of the organization as well as the personal information management shall be available as requested. The information will include:

- Name and address of the Privacy Officers;
- Means of gaining access to personal information held by the organization; and
- Copy of any brochures or other information that explain the organization's policies, standards or codes.

#### **9. Access to Personal Information**

Access to personal information will be granted, where the organization is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contracts, to the person to whom the information pertains where there is an appropriate written request. The existence, use and disclosure of the personal information will be granted within a reasonable period of time. Any inaccuracy or incompleteness of personal information will be amended, if required.

#### **10. Challenging Compliance**

Complaints or inquiries about the collection, use, disclosure or retention of personal information and the organization's compliance with these principles should be directed, in writing, to the Privacy Officers. The Privacy Officers will investigate complaints and ensure that appropriate measures are taken.

## **11. Website**

When an individual visits the website, steps are taken to respect and protect his or her privacy. Generic, non-personal information about visits to the website may be collected. Personal information such as names, ages, phone numbers, addresses or email addresses from visitors to our website is not collected. Selected visitor information such as IP addresses, return visits from past guests, referring pages, pages visited and time spent on the website may be collected. This nonpersonally identifiable information is collected in order to obtain statistical analysis of website traffic patterns, administer our website and servers, allow for auditing of services by third parties and improve services. Data is collected in aggregate form and data is not recorded or stored about individual visitors.

A cookie may be used; this is information about how and when a visitor uses a site. A cookie is created at the time a person visits a site. Cookies are not used to retrieve personal data from a visitor's hard drive or to obtain email addresses or other personal information. Rather than retain this data, the organization's cookie is a small text file sent to the visitor's computer hard drive to record his or her preference information on his or her own computer. If a visitor does not wish to accept cookies, he or she may choose not to set his or her browser options to inform him or her when cookies are being sent or to deny cookies altogether. Please note, however, that by not accepting cookies, a visitor may limit the functionality that can be provided to him or her when he or she visits the website.

## **Contact Us**

If you have questions or comments about our policy or about the personal information we have about you, you may contact us and we will do our best to answer your questions.

Diana Koldyk, Privacy Officer: Telephone 989-6749 or write to the Privacy Officer at 877 Wilkes Avenue, Winnipeg, Manitoba, R3P 1B8.

If dissatisfied with a decision by the Privacy Officer, you may write to the applicable Board Chair with jurisdiction (Grant Memorial Baptist Church Deacon Board, Linden Christian School Board or Lindenholtm Board).

If you remain dissatisfied regarding a decision by the applicable Board, you may file a complaint with the Privacy Commissioner of Canada by telephone (1-800-282-1376) or write to 112 Kent Street, Ottawa, Ontario, K1A 1H3.

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