

## **The Gathering Privacy Policy**

As a registered charity the Gathering Church has opted to comply with the *Personal Protection and Electronic Documents Act*, S.C. 2000, c. 5 as amended and *Bill C-27: Consumer Privacy Protection Act* when it comes into force (collectively referred to as “PIPEDA”) which regulate the collection, use and disclosure of personal information gather by the church.

### Why do we need this policy?

The Gathering is committed to maintaining the accuracy, confidentiality, and security of all personal information in its possession. This policy will define how the Gathering will safeguard personal information entrusted to the church in compliance with PIPEDA.

### Who is affected by this policy?

All persons who provide personal information to the Gathering will benefit from the protections offered by this policy. The Church, its Board members, officers, employees and volunteers are required to comply with this policy.

### What type of information does this policy apply to?

The policy applies to personal information collected by The Gathering about members, volunteers, donors, and other constituents or stakeholders of The Gathering church including information used or disclosed in the course of its activities.

The policy also applies to the management of personal information in any form, whether written, oral or electronic.

### What type of information is excluded from this policy?

1. An individual’s name, address and telephone number that appears in a telephone directory that is available to the public, when the individual has the option to refuse the publication of this information;
2. Business contact information and publicly available information, such as names, addresses and telephone numbers as published in phone directories or internet searches (ex. business websites), are not considered personal information, and are therefore excluded from this policy;
3. An employee’s name, title, business address or telephone number;
4. Other information about an individual that is publicly available or that is specified by regulation pursuant to PIPEDA.

### How is the policy enforced?

The privacy requirements under PIPEDA is enforced by the Privacy Commissioner of Canada.

To ensure compliance with the policy and PIPEDA, the Gathering has appointed a Privacy Officer. The privacy officer will be fully aware of all requirements under PIPEDA and provide instruction and guidance when necessary to individuals involved in the collection, use, and disclosure of personal information.

**The current Privacy Officer is: Wesley Robinson**

## PIPEDA Governing Principles

There are ten (10) interrelated governing principles provided in PIPEDA that form the basis of this privacy policy and The Gathering will adhere to them as a whole.

### Principle #1 – Accountability

The Gathering is responsible for personal information in its possession or under its control.

All Elders, Deacons, employees and volunteers are responsible for maintaining and protecting the personal information under their control and accountable to the Privacy Officer.

### Principle #2 – Identifying Purposes for Collection of Personal Information

The Gathering will identify the purposes for which personal information is collected at or before the time the information is being collected.

The Gathering has included, but is not limited to, the following purposes for collecting information:

1. To enable communication;
2. To process safety checks for individuals working with children and vulnerable people;
3. To coordinate and collaborate the delivery of ministry services and other activities;
4. To enable the processing of donations through electronic methods, pre-authorized debit, credit cards, cheques, or other means as may change from time to time;
5. To provide income tax receipts;
6. For maintenance of active and inactive membership lists in accordance with The Gathering constitution and bylaws;
7. For the collection of money and registrations for certain events, activities, retreats, dinners, and/or other similar events; and
8. To meet statutory and/or regulatory requirements.

### Principle #3 – Consent

The collection of personal information will be in writing on official church documentation. However, there can be allowances for the provision of personal information for the use and disclosure by The Gathering over the phone or electronically in extenuating circumstances as may be determined from time to time.

An individual may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The individual in their sole and absolute discretion has the choice to provide The Gathering with their personal information. However, if an individual chooses to withhold certain personal information, it may impact The Gathering's ability to meet the specific requirements for the provision of services to the individual and this will be disclosed to the individual by The Gathering.

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

#### Principle #4 – Limiting Collection of Personal Information

The Gathering will limit the collection of personal information to that which is necessary for the purposes identified above, and any other purposes determined from time to time by The Gathering.

#### Principle #5 – Limiting Use, Disclosure, and Retention of Personal Information

The Gathering will not use or disclose personal information for the purposes other than those for which it was collected, except with the consent of the individual or as required by law. Any personal information collected will only be retained as long as necessary for the fulfillment of the purposes for which it was collected.

#### Principle #6 – Accuracy of Personal Information

The Gathering will make all reasonable efforts to ensure that the personal information collected will be as accurate, complete, and up-to-date as is necessary for the purpose for which it is to be used.

If an individual finds any inaccuracies in The Gathering information, they should inform the Privacy Officer, the elders, officers, or employees of The Gathering, and corrections will be made. The Gathering relies on the individuals providing their personal information to ensure that the information is current, complete, and accurate.

#### Principle #7 – Security Safeguards

The Gathering shall use 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.

All employees and volunteers are required to abide by this Privacy Policy and follow the applicable laws and regulations. Access to personal information is limited to employees and volunteers whose job responsibilities require access to it.

#### Principle #8 – Openness Concerning Policies and Procedures

The Gathering will readily make available to individuals impacted by this Privacy Policy, the specific information related to the processes and management of information and safeguards to protect it. The Privacy Officer can be contacted directly to obtain this information.

#### Principle #9 – Access to Personal Information

The Gathering will provide an individual upon their request, with the use and disclosure of their information. The individual may also be allowed to confirm or challenge the accuracy and/or completeness of their information and request an amendment as may be necessary.

Notwithstanding the foregoing paragraph, The Gathering reserves the right to restrict the disclosure of, or access to certain personal information it holds about an individual, if the release of this information would reveal the personal information of a third party or breach the policies included herein. If access cannot be provided under these strict circumstances, the individual will be notified in writing, and provided with the reason(s) for the refusal.

### **Principle #10 – Process for Enquiries and Complaints**

**An individual may address concerns regarding compliance with this Privacy Policy with the Privacy Officer:**

- 1. By email at: [PrivacyOfficer@gmail.com](mailto:PrivacyOfficer@gmail.com)**
- 2. By mail to: The Gathering Church, 2401 Columbus Avenue, Windsor, Ontario N9E 1R8; or**
- 3. By phone: (519) 962-5110**

**For a copy of the PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's website at: [www.privcom.gc.ca](http://www.privcom.gc.ca)**

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