

Privacy Policy

Date Approved: 8-06-26

Approved by: Director of Operations

1. Intent

- 1.1 This policy expresses Grant Church's commitment to protecting personal information and establishes requirements for its fair, transparent and secure collection, use, disclosure, retention and destruction.
- 1.2 Grant Church follows the ten fair information principles reflected in the Personal Information Protection and Electronic Documents Act (PIPEDA). It will comply with applicable federal and provincial privacy, employment, charitable, taxation, safeguarding and records-management laws.
- 1.3 Grant Church is accountable for personal information under its control. The Board of Trustees provides oversight, the Director of Operations leads implementation, and the Privacy Officer administers this policy.

2. Application

- 2.1 This policy applies to Grant Church and anyone who handles personal information on its behalf, including employees, officers, Board and committee members, ministry leaders, contractors and volunteers.
- 2.2 It applies to personal information in any form, including paper, electronic, visual, audio and verbal information.
- 2.3 Grant Church may handle information as required or permitted by law. A conflicting legal requirement will govern.

3. Description

3.1 Personal Information

Personal information identifies an individual, alone or combined with other information, in any form. Depending on context, it may include:

- Identity and contact information, including name, address, telephone number, email, signature and date of birth
- Government identifiers, including Social Insurance Number and driver's licence information
- Demographic information, including race, ethnicity, citizenship, language, sex, gender identity or expression, sexual orientation, family status and religion
- Family information, including parent, guardian, emergency-contact and next-of-kin details
- Health, accessibility and safety information, including medical conditions, allergies, medications, disabilities, accommodations and emergency information
- Financial information, including payroll, benefits, banking, payment and reimbursement records
- Donation information, including gift history, payment and tax-receipt details, and communication preferences
- Employment, applicant and volunteer records, including resumés, screening, attendance, compensation, evaluations, discipline, complaints and termination information
- Ministry information, including membership, attendance, registrations, participation, spiritual care, prayer requests and pastoral communications
- Internal records, including reports, safeguarding records, meeting notes, opinions and assessments
- Photographs, audio and video recordings, livestream images, security camera recordings and access-control records
- Technology information, including usernames, device, browser and IP data, website activity, communications and access logs
- Other information provided during an individual's relationship with Grant Church

3.2 Collection and Use of Personal Information

Grant Church will identify its purposes before or at collection and collect only what is reasonably necessary by fair and lawful means. Purposes include:

- Providing pastoral care, prayer support, and membership processes
- Registering individuals for programs, events, facility use, trips, camps and activities
- Communicating ministry opportunities, schedules, and emergency notices
- Maintaining relationships with attendees, members, volunteers, donors, staff and community contacts
- Recruiting, screening, scheduling, supporting and supervising employees and volunteers

- Administering employment, payroll, benefits, performance, and workplace safety
- Protecting children, youth and vulnerable persons through appropriate screening
- Responding to medical, safety, security, pastoral or other emergencies
- Processing donations, issuing charitable tax receipts, maintaining financial records and communicating with donors
- Managing facilities, access control, security, insurance, legal matters, risk, complaints and incident investigations
- Operating and securing websites, networks, email, databases, online services and other technology
- Meeting legal, regulatory, contractual, audit, insurance, archival and historical-record requirements

Video Surveillance:

Grant Church uses security cameras only to protect people and property and investigate incidents. Only authorized individuals may access recordings, which will be retained only as reasonably necessary or required for legal, insurance or preservation purposes.

Grant Church will not collect information indiscriminately or deceptively. It will identify any materially new use and obtain further consent where required.

3.3 Grant Church Principles of Protecting Personal Information

Grant Church applies the following ten PIPEDA principles:

Accountability:

Grant Church is responsible for information under its control, including information handled by service providers. Everyone covered by this policy must protect information they handle.

Identifying Purpose:

Grant Church will identify and document why information is needed before or at the time of collection.

Consent:

Grant Church will seek meaningful consent unless applicable law permits otherwise.

Limiting Collection:

Collection will be fair, lawful and limited to identified purposes.

Limiting Use, Disclosure and Retention:

Information will be used, disclosed and retained only for identified or related purposes, or as permitted by law.

Accuracy:

Grant Church will keep information sufficiently accurate, complete and current.

Safeguards:

Safeguards will reflect the information's sensitivity, amount, format and location.

Openness:

Grant Church will make understandable information about its privacy practices available.

Individual Access:

Individuals may request access and corrections, subject to applicable exceptions.

Challenging Compliance:

The Privacy Officer will investigate questions or complaints and address justified concerns.

3.4 Consent

Grant Church will explain the nature, purpose and foreseeable consequences of handling personal information. Consent may be express or implied depending on sensitivity, reasonable expectations and circumstances.

- Express consent may be written, electronic, oral or provided by an authorized representative. It will generally be required for sensitive information, unexpected purposes or meaningful residual risk of significant harm.
- Consent may be implied when an obvious purpose leads an individual to provide information voluntarily
- For someone unable to consent, Grant Church may seek consent from an authorized representative, considering maturity, capacity and best interests
- Participation will not be conditional on consent to unnecessary handling of information

An individual may withhold or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Grant Church will explain any reasonably foreseeable consequences, which may include being unable to provide a requested ministry, program, service, benefit or tax receipt. Withdrawal does not affect actions already taken on valid consent and does not require Grant Church to destroy information that it must or is reasonably permitted to retain.

3.5 Disclosure of Personal Information

Grant Church does not sell or trade personal information or donor, membership or fundraising lists. Disclosure is limited to identified purposes, consent or law, including:

- To employees, volunteers, leaders or committees who require the information to carry out authorized responsibilities
- To service providers, including payroll, payment, audit, insurance, legal, technology, screening and mail providers
- To government, law-enforcement, child-protection, emergency or other authorized bodies
- To respond to an emergency or contact an appropriate representative
- For authorized investigations, proceedings, insurance matters, debt collection or protection of legal rights
- At the request of, or with the consent of, the individual

Service providers will receive only the information reasonably necessary to perform their services. They will be expected, by contract or other appropriate assurance, to use reasonable safeguards and limit their use of the information. Some providers may process or store information outside Manitoba or Canada. Grant Church will provide appropriate notice that service providers may process or store personal information outside Manitoba or Canada.

Before engaging service providers that process personal information outside Canada, Grant Church will consider the associated privacy risks and implement appropriate contractual and security protections where reasonable.

3.6 Maintaining and Safeguarding Personal Information

Grant Church will protect information against loss, theft and unauthorized handling.

Grant Church will assess privacy risks when introducing or materially changing programs, technologies, systems or processes and will incorporate reasonable privacy protections into their design, implementation and operation.

Safeguards proportionate to sensitivity and volume may include:

- Physical safeguards, including secure records, restricted areas and access controls
- Organizational safeguards, including confidentiality commitments, privacy training, need-to-know access limited to individuals whose authorized duties reasonably require the information, role-based permissions, supervision and approved records-handling procedures.
- Technological safeguards, including individual accounts, strong authentication, encryption, backups, security controls, logging and timely access removal
- Privacy-conscious communications, including verifying recipients and concealing addresses when appropriate

- Confidentiality duties continue after a person's role ends

Employees and volunteers must use only approved systems and storage locations for Grant Church records, must not share credentials, and must promptly report suspected loss, misdirection, unauthorized access or other privacy concerns to the Privacy Officer. Personal information must not be displayed publicly or shared internally unless authorized and reasonably necessary for the ministry or operational purpose.

3.7 Retention and Secure Destruction

Retention practices will reflect operational, legal, tax, audit, insurance, safeguarding, employment, archival and historical requirements. Information will be kept only as reasonably necessary or legally justified.

When information is no longer required, Grant Church will securely destroy it or remove identifying details. Paper records will be cross-cut shredded or securely destroyed. Electronic records will be securely deleted from active systems and disposed of through approved processes, recognizing that copies may remain temporarily in system backups until they are overwritten in the ordinary course. Destruction may be suspended when records are subject to a complaint, investigation, audit, legal hold or anticipated legal proceeding.

3.8 Privacy Incidents and Breach Response

Actual or suspected privacy incidents must be reported immediately to the Privacy Officer, who will coordinate containment, evidence preservation, assessment, documentation, mitigation, recovery and required notifications.

Grant Church will assess the sensitivity of the information, the probability of misuse, the number and circumstances of affected individuals, and the potential consequences. Where required by applicable law, Grant Church will notify affected individuals, the Office of the Privacy Commissioner of Canada or another authority as soon as feasible. Where PIPEDA applies, Grant Church will keep records of all breaches of security safeguards for the legally required period. It will report and notify breaches that create a real risk of significant harm.

3.9 The Role of the Privacy Officer

Grant Church's Privacy Officer is the primary contact for privacy matters. The Privacy Officer is responsible for supporting implementation of this policy; monitoring collection, access and safeguards; coordinating training; reviewing service-provider privacy protections; responding to incidents; and handling inquiries, access or correction requests and complaints.

The Privacy Officer may delegate administrative duties but retains oversight. Ultimate accountability rests with the Director of Operations and Board of Trustees.

3.10 Individual Access and Correction

An individual may submit a written or electronic request to the Privacy Officer to learn whether Grant Church holds their personal information, obtain access to it, understand how it has been used or disclosed, or request a correction. Grant Church may request information reasonably necessary to verify the requester's identity and locate the records. Identity-verification information will be used only for that purpose.

Grant Church will respond within a reasonable time and within any period required by applicable law. Where PIPEDA applies, Grant Church will normally respond within 30 days, subject to any lawful extension. Access will generally be provided at no cost.

Grant Church may limit or refuse access where the information:

- Cannot reasonably be separated from personal information about another individual
- Is protected by solicitor-client privilege or another legal privilege
- Could reasonably threaten the life, health, safety or security of an individual
- Was generated in a formal dispute-resolution, investigation or confidential-reference process and applicable law permits or requires access to be withheld
- Must or may otherwise be withheld under applicable law

Where access is limited or refused, Grant Church will provide the reason and available recourse unless prohibited by law. If information is shown to be inaccurate or incomplete, Grant Church will correct it as appropriate and, where necessary, notify parties to whom the incorrect information was disclosed. If a requested correction is not made, Grant Church may annotate the record with the unresolved request.

3.11 Compliance Inquiries and Complaints

Individuals may question the Privacy Officer about compliance. Grant Church will:

- Record the date and nature of the inquiry or complaint
- Acknowledge receipt promptly
- Review the matter fairly and impartially
- Communicate the outcome and reasons clearly
- Correct inaccurate information and take other appropriate measures where a complaint is justified

If the individual is not satisfied with the Privacy Officer's response, they may request an internal review by the Director of Operations and then by the Board of Trustees. Nothing in this internal

process limits any right to contact the Office of the Privacy Commissioner of Canada or any other body with jurisdiction over the matter.

For access, correction, questions or complaints, contact:

- Email: privacy@grantchurch.ca
- Mail: 877 Wilkes Avenue, Winnipeg, MB, R3P 1B8, Attention: Privacy Officer

3.12 Policy Review and Training

The Privacy Officer will periodically review this policy and recommend revisions. The current approved version supersedes earlier versions.

Grant Church will provide role-appropriate privacy training to employees, ministry leaders and volunteers.