

Privacy Policy

Date Approved: 9-04-25

Approved by: Director of Operations

1. Intent

- 1.1 This Privacy Policy is Grant Church's commitment to the protection of any personal information that is disclosed to GMC. It was created to ensure Grant Church preserves the confidentiality, accuracy and security of this information. These principles guide Grant Church in the collection, use, retention and disclosure of all personal information.

2. Application

- 2.1 This policy applies to all Grant Church employees and volunteers.

3. Description

3.1 Personal Information

Personal information is any recorded information about an identifiable individual. This includes details that can identify someone on their own or in combination with other information, such as:

- Name
- Address
- Date of birth
- Age
- Gender
- Health information
- Financial information
- Driver's license
- Social Insurance Number

In Manitoba, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) is considered the provincial code that governs how private organizations handle personal information.

3.2 Collection and Use of Personal Information

Information collected by Grant Church allows the processing or development of:

- Donation receipts
- Child abuse registry checks
- Police record checks
- Ministry volunteer database
- Employee files
- Communication
- Relationship building

Grant Church will ask permission and inform the individual why the information is being collected. In some instances, where the purpose for collection is obvious, a person's consent is implied. Personal information will only be used for the purposes identified when express consent was obtained.

3.3 Grant Church Principles of Protecting Personal Information

Grant Church is committed to continuous improvement of its processes and values input. It strives to ensure that the personal information collected, used and disclosed is accurate and up to date. A Privacy Officer (as outlined in Section 3.7) is appointed to ensure that all employees and volunteers comply with the following principles of protecting this information.

Accountability:

Grant Church is responsible for maintaining and protecting the personal information under its control. Grant Church's Privacy Officer is responsible for ensuring that the church complies with its privacy obligations in accordance with applicable privacy laws, including PIPEDA.

Identifying Purpose:

Before or at the time personal information is requested, the purposes for which it will be used or disclosed will be identified.

Consent:

A person's knowledge and consent for the collection, use or disclosure of personal information is required.

Limiting Collection:

The collection of personal information is limited to only the purposes identified.

Limiting Use, Disclosure and Retention:

Personal information will be used or disclosed only for the purpose to which consent has been given (or as required by law). The information will be retained only for as long as necessary to fulfill identified purposes.

Accuracy:

The information will be kept accurate, complete and up-to-date, as new information is provided.

Safeguards:

Personal information will be protected with appropriate security safeguards, such as physical measures, technological tools, and organizational controls.

Openness:

Specific, understandable information will be made readily available regarding Grant Church's personal information policies and practices.

Individual Access:

When requested, access will be given to the existence, use and disclosure of a person's information. That person is entitled to question the accuracy, completeness, and use of the information.

Challenging Compliance:

A person whose records are held by Grant Church is entitled to question the Privacy Officer about the church's compliance with any of these principles.

These principles are expanded upon throughout the rest of this policy.

3.4 Disclosure of Personal Information

Grant Church does not provide or exchange personal information to other organizations without consent. Personal information is a vital part of Grant Church's ongoing relationship with its constituents. Personal information will only be disclosed:

- a) On a confidential basis, to obtain a child abuse registry check or a police check
- b) If the disclosure is required or permitted by law
- c) If an individual requests or consents to the disclosure

Consent for the use of personal information can be withdrawn at any time, upon reasonable notice to Grant Church. The implications of withdrawal will be communicated. Grant Church may retain information for audit and archival purposes.

3.5 Maintaining and Safeguarding Personal Information

Grant Church strives to ensure that security measures protect personal information against unauthorized access, loss, deletion or alteration. This includes limiting access to those employees who have signed off on the Grant Church Confidentiality policy. This includes the use of individual sign-up procedures for program registration, which are stored in a secure location, prohibiting personal information from being displayed publicly.

3.6 Limiting Use, Disclosure and Mandatory Breach Reporting

Grant Church recognizes its legal obligations to protect the personal information gathered about individuals. It has made provisions to secure against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. This includes internal church policies and agreements with any outsourced service providers. These provisions may consist of physical security measures, network security measures, and organizational policies such as the Grant Church Confidentiality policy, non-disclosure agreements, and need-to-know access.

In the unfortunate event that Grant Church suffers a loss of personal information, or unauthorized access to or disclosure of personal information, it will notify any affected individuals as required by law and the Office of the Privacy Commissioner of Canada.

3.7 The Role of the Privacy Officer

Grant Church's Privacy Officer is the point of contact regarding any matters related to the use of personal information. The Privacy Officer is responsible for monitoring information collection and data security, and ensures that other staff members receive appropriate training on privacy issues and their responsibilities under PIPEDA. The Privacy Officer also handles all privacy inquiries and personal information access requests under PIPEDA.

However, ultimate responsibility for the compliance with the Policy rests with the Director of Operations and the Board of Trustees.

3.8 Individual Access to Their Personal Information

When an individual requests access to their personal information, a reasonable amount of time (typically 14 days) must be allowed to respond to a request. There is no cost for these requests unless several copies of the records are required. Grant Church will advise of any costs before copying those records.

Grant church may not be able to provide access to personal information where the information:

- Cannot be separated from the records of others
- Cannot be disclosed for reasons of security
- Is protected by legal privilege

3.9 Compliance Inquiries

An individual whose records are held by Grant Church is entitled to question the Privacy Officer about the church's compliance with any of these principles.

If the individual is not satisfied with the response from the Privacy Officer, they may then appeal to the Director of Operations. If they are not satisfied with this second response, they may then appeal to the Board of Trustees to review and determine the disposition of the complaint at issue.

The determination of the Board of Trustees shall be final, and the Privacy Officer shall abide by and implement any of its recommendations.

If an individual would like to review their own personal information, correct or revise existing information, or have any questions, comments or concerns regarding this policy or its application, please contact the Privacy Officer at:

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