

VILLAGE CHURCH

Protection of Privacy



Introduction

Village Church upholds an individual's right to privacy and is committed to respecting the privacy of member and participant personal information that is collected and maintained in the course of carrying on its ministry activities in compliance with British Columbia's *Personal Information Protection Act (PIPA)*. This Privacy Policy demonstrates the commitment to the principles outlined in the PIPA.

All directors, officers, employees and volunteers of Village Church are required to comply with the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

All other persons or organizations who act for, or on behalf of, Village Church are also required to comply with the principles and the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

Overview

This Policy covers the treatment of personal information collected from members, participants, and attendees. The Policy outlines the purposes behind the collection and use of personal information. In addition, it outlines policies concerning the collection, use, distribution and retention of this information as well as policies for addressing any concerns or complaints.

Requests to add, change or delete personal information that is retained by Village Church should be sent to the address below. A person can review and edit their information by logging into their account at <https://thisisvillagechurch.ccbchurch.com/login.php> – also known as Village Connect. Regularly, you are given opportunities to change or opt out of receiving communication materials by clicking the “Unsubscribe” or “Change your Preferences” links at the bottom of emails sent from Village Church.

Privacy Officer

Village Church has appointed a Privacy Officer who is responsible for the organization's compliance with this policy. The Board and each team, employee and volunteer is responsible for maintaining and protecting the personal information under its/their control and is accountable for such information, to the Privacy Officer. The Village Church Privacy Officer is the Executive Pastor. Any concerns regarding privacy issues can be directed to:

Executive Pastor
Privacy Officer

Village Church Ministry Centre
14928 56 Ave
Surrey, BC V3S 2N5
604-560-5577
admin@thisisvillagechurch.com

Accountability

Village Church is responsible to maintain and protect any information that they have about an individual.

Village Church is responsible for personal information which is collected, used or distributed and any personal information in our custody or under our control. In order to fulfill our responsibility and comply with current legislation:

- We have designated a privacy officer who is responsible to oversee our privacy policy and ensure routine compliance with it.
- We shall make known the name or names of the Privacy Officer(s) and contact information upon request.
- We have developed procedures in accordance with this Privacy Policy to govern the handling of personal information and respond to complaints.
- Our staff and volunteers are trained in accordance with this Privacy Policy and committed to ensuring privacy is protected.
- Our policy is made available to our members and participants through the Ministry Centre and our website.
- In the event that personal information is made available to a contracted third party, we will hold that party responsible to maintain comparable levels of protection of privacy while the information is in their control.

Identifying Purposes

Village Church is committed to ensuring that the purposes for which personal information is used are identified. Village Church will only collect personal information from participants that is necessary to fulfill the following purposes:

- Administer donations
- Respond to information requests
- Know who our supporters are
- Send you information about Village Church or partners programs and events
- Invite you to recognition, appreciation, and information sessions
- Thank you for your support
- Verify identity
- Identify your preferences
- Deliver requested products and services
- Provide counseling services
- Contact for fundraising
- Ensure a high standard of service to our church family members;
- Meet regulatory requirements

Village Church will make this Policy known to individuals at the time that personal information is being collected either orally, electronically or in writing.

The only circumstance under which personal information may be disclosed to third parties is for the fulfillment of any purposes identified above, or as required by law. Where personal information is disclosed to third parties for the fulfillment of any purposes identified above, the church 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

Village Church will obtain reasonably informed consent of a member/participant to collect, use or disclose personal information except where we are authorized to do so without consent.

Consent can be provided orally, in writing, electronically or through an authorized representative. We will take reasonable steps to ensure that consent given is clearly understood.

Consent can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the person voluntarily provides personal information for that purpose.

In general, the use of products and services by a member/participant, or the acceptance of employment or benefits by an employee, constitutes implied consent for Village Church to collect, use and disclose personal information for all identified purposes.

Consent may also be implied where a member/participant is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mailing lists and fundraising and the church family member does not opt-out.

Subject to certain exceptions, members/participants can withhold or withdraw their consent for Village Church to use their personal information in certain ways.

A member/participant may not be able to withhold consent when withdrawal of consent would frustrate the performance of a legal obligation.

Village Church will not require consent to the collection and use of information in order to access goods or services unless that information is necessary to fulfill the purpose identified. In a situation where a member's/participant's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product we will explain the consequences of withdrawing consent to assist the person in making the decision.

The following are examples of when we may collect, use or disclose the personal information of a church family member without their consent:

- When the collection, use or disclosure of personal information is permitted or required by law.
- When collection is clearly in your best interests and we are unable to obtain your consent in a timely way.
- In an emergency that threatens an individual's life, health, or personal security.
- When disclosure is required to comply with a court order.
- When disclosure is required for archival purposes.
- When the personal information is available from a public source (e.g., a phone directory, LinkedIn, etc).
- When the personal information is available through observation at a public event to which you attended voluntarily.
- When the collection, use or distribution is necessary to determine your suitability to receive an honour, award or similar benefit or to be selected for an athletic or artistic purpose.
- When we require legal advice from a lawyer.
- For the purposes of collecting a debt.
- To protect ourselves from fraud.
- To investigate an anticipated breach of an agreement or a contravention of law.

Limiting Collection

Village Church shall limit the collection of personal information to the purposes set out in this policy in compliance with our legal obligations.

Village Church will not collect personal information indiscriminately.

The purposes for collecting personal information shall be reasonably clear at the time of collection and we will not deceive or mislead our church family members as to why information is being collected.

Limiting Use, Disclosure and Retention

Village Church will only use and disclose personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes except where we are authorized to do so (see Section – Consent).

Village Church will not use or disclose church family member personal information for any additional purpose unless we obtain consent to do so.

Village Church will not sell church family member lists or personal information to other parties without consent.

Village Church will only retain personal information as long as it is needed for the purposes for which it was collected or consented to. Village Church will maintain reasonable schedules to ensure that personal information is reviewed on an ongoing basis to determine relevance and if retention is required.

When personal information collected is no longer relevant to its purpose or when it is permitted by law, Village Church will ensure that it is deleted, destroyed or made anonymous. In general, all personal information shall be deleted, destroyed or made anonymous no later than seven years after the purpose for which it was collected has been completed unless the law requires otherwise.

If Village Church uses personal information to make a decision that directly affects the church family member we will retain that personal information for at least one year to give the church family member a reasonable opportunity to request access to it.

Accuracy

Village Church is committed to ensuring the accuracy of its information and will make reasonable efforts to ensure that personal information is accurate and complete where it is necessary.

Village Church will update information when it is necessary or when an individual notifies us. Members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. This request should be directed to the Privacy Officer.

The Church relies on the individual to ensure that certain information, such as mailing address, email, and phone number is current, complete and accurate. A person can review and edit their information by logging into their account at <https://thisisvillagechurch.ccbchurch.com/login.php> – also known as Village Connect.

Safeguards

Village Church is concerned about the safety of our member's and participant's personal information. In order to address security concerns, we have developed the following safeguards:

- Physical security measures including locked cabinets, restricted access to areas where sensitive personal information is kept, security alarm systems, etc;
- Organizational security measures including employee confidentiality agreements, sensitive information restricted to those involved, etc.; and
- Technological security measures including use of passwords, firewalls and security encryptions.

Village Church shall protect personal information disclosed to third parties by contractual agreement that stipulates the confidentiality and safeguard requirements that are comparable to our own.

We will use appropriate security measures when destroying personal information such as shredding any documents and deleting any electronic records.

Openness

Village Church is committed to making its privacy policies and procedures available and clear to all interested parties. We will demonstrate our commitment to this openness by making the Privacy Policy easy to access and by making the contact information of our Privacy Officer readily available. Any questions or concerns regarding our policy or procedure may be directed in writing to the Privacy Officer.

Individual Access

Individuals have a right to access their personal information, subject to limited exceptions including, but not limited to:

- Situations where disclosure may reveal the personal information of another individual; and
- Situations where the health or safety of an individual may be jeopardized.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the attention of the Privacy Officer. We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request. A reasonable fee may be charged for providing access to personal information, in which case we will inform the individual prior to proceeding.

We will endeavour to make all information provided easy to understand and explain any acronyms, abbreviations, etc. used.

We reserve the right to confirm the identity of the individual seeking access to personal information before complying with any access requests. In this event, information related to the individual's identity would be used exclusively for the purposes of confirming access.

In certain situations, it may not be possible to provide access to all the personal information that is held and a request may be refused in whole or in part. For example, information may not be provided if to do so would reveal personal information about a third party or jeopardize the security of another.

If a request is refused in full or in part or if the information requested is not available, we will notify the individual in writing, providing the reasons for refusal and the recourse. This notification will be kept on file.

In the event that information provided is shown to be incomplete or inaccurate, we will amend the individual's personal information appropriately. When appropriate, we will transmit this correction to third parties with access to this information. When a challenge is not resolved to an individual's satisfaction, we will destroy all personal information under our care and control.

Challenging Compliance

Complaints made regarding the Privacy Policy or the use of personal information should be made to the Privacy Officer in writing. The Privacy Officer shall receive and respond to all personal information requests including challenges or complaints.

It is Village Church's policy that all complaints shall be investigated. If a complaint is found to be justified, the Officer shall take appropriate measures, including, if necessary, amending this Policy.

The Privacy Officer may seek external advice where appropriate before providing a final response to individual complaints. If the Privacy Officer is the subject of the complaint, then the Chair of the Elder Team will address any complaints or concerns. If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.

Village Church's procedure for dealing with complaints is as follows:

- Record the date and nature of a complaint when it is received
- Acknowledge receipt of the complaint promptly
- Review the matter fairly and impartially, providing to the individual where possible, access to all relevant records.
- Notify the individual of the outcome of the investigation promptly and clearly.
- Correct any inaccurate or incomplete information when possible.

The contact information for the Privacy Officer is noted in Section – Privacy Officer.

Revisions to this Policy

The development of the Village Church's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, the Church may revise this policy from time to time.

A copy of the current version may be obtained from the Village Church Privacy Officer or on the church website: www.thisisvillagechurch.com/privacy