

# CARIBOO ROAD CHRISTIAN FELLOWSHIP

## GENERAL PRIVACY POLICY

### OUR COMMITMENT TO PRIVACY AND OUR PRIVACY PRACTICES

**Cariboo Road Christian Fellowship** (“CRCF”) is committed to protecting the privacy, confidentiality and security of the personal information of its members, supporters and other stakeholders. CRCF values the trust of those it deals with and recognizes that maintaining that trust requires that CRCF be transparent and accountable in how CRCF treats the information that you provide to CRCF.

During the course of CRCF’s various activities, CRCF frequently gathers and uses personal information. Anyone from whom CRCF collects such information should expect that it will be carefully protected and that except as otherwise legally required or permitted any use or other dealing with this information is subject to consent. CRCF’s privacy practices are designed to achieve this.

Personal information gathered by CRCF is kept in confidence. CRCF staff are authorized to access personal information based only on their need to deal with the information for the reasons for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. CRCF also takes measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed.

This policy is based on the *Ten Privacy Principles* contained in the Canadian Standards Association (CSA) Model Code for the protection of personal information and on which the relevant privacy legislation is founded. CRCF has tailored its own ten privacy principles in compliance with the relevant privacy legislation to meet the specific needs and expectations of its stakeholders.

### SCOPE OF POLICY

This policy applies to personal information of individual stakeholders in the possession and control of CRCF. This policy does not apply to employee and volunteer personal information. This information is covered by the CRCF Employee and Volunteer Privacy Policy. This policy also does not apply to information collected, used or disclosed with respect to corporate or commercial entities that deal with CRCF. Corporate and commercial information is protected by other policies and practices of CRCF and through contractual arrangements.

This policy does not apply to the collection, use or disclosure of your contact information or publically available information by CRCF.

## DEFINITIONS

In this policy:

**“business contact information”** means information to contact a person at a place of business, including the person’s name, position, business address, business telephone number, business e-mail address and business fax number.

**“CRCF”** means Cariboo Road Christian Fellowship Society which operates a church in Burnaby, British Columbia.

**“collection”** means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

**“consent”** means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is clear and does not require any inference on the part of CRCF. Implied consent exists when CRCF can reasonably infer consent based upon your action or inaction.

**“disclosure”** means making personal information available to others outside of CRCF.

**“personal information”** means information about an identifiable person that is recorded in any form but does not include his or her business contact information. Personal information includes a person’s age, gender, race, ethnic origin, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, travel history, consumer preference information, personal habits, personal interests and personal history. Personal information does not include information that cannot be associated with a specific person.

**“privacy officer”** means a person designated by CRCF who is accountable for compliance with this policy by CRCF and whose contact information is set out at the end of this policy.

**“third party”** means a person or organization other than CRCF and you.

**“use”** means the treatment and handling of personal information by and within CRCF.

**“you”** means an CRCF member, CRCF supporter, CRCF stakeholder and anyone else for whom CRCF collects personal information, except for employees and volunteers of CRCF for whom CRCF has a separate privacy policy.

## **1. CRCF ACCOUNTABILITY**

CRCF is accountable and responsible for personal information under its control, including information that has been transferred to a third party. In cases where such transfers take place CRCF will ensure that the third party has comparable privacy safeguards in place. CRCF has designated a privacy officer to ensure compliance with this policy.

Ultimate accountability for CRCF compliance rests with the Board of Directors of CRCF who delegate day-to-day accountability to the privacy officer. Other persons within CRCF may be accountable for the day-to-day collection and processing of personal information or may act on behalf of the privacy officer.

CRCF will adopt policies, procedures and practices to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies, procedures and practices and communicate policies, procedures and practices to you.

## **2. IDENTIFYING THE PURPOSES OF PERSONAL INFORMATION**

When collecting personal information CRCF will orally or in writing state the purpose of collection and will provide, on request, contact information for the privacy officer who can answer questions about the collection.

CRCF may collect your personal information for the following purposes:

- \$ to provide and administer religious and other related products and services through CRCF;
- \$ to provide administrative services through CRCF;
- \$ to assess applications for membership in CRCF by prospective members;
- \$ to contact CRCF members, CRCF supporters and other CRCF stakeholders regarding religious and other related products and services of CRCF;
- \$ to contact CRCF members, CRCF supporters and other CRCF stakeholders for special events, promotions, fund raising and other similar matters, which are directly or indirectly beneficial to CRCF;
- \$ to administer the policies, procedures and practices of CRCF;
- \$ to thank and publically recognize CRCF members, CRCF supporters and other CRCF stakeholders;

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- \$ to provide CRCF members, CRCF supporters and other CRCF stakeholders with information about how donated funds are used by CRCF;
- \$ to keep CRCF members, CRCF supporters and other CRCF stakeholders informed about the activities of CRCF;
- \$ to promote opportunities for CRCF members, potential members, CRCF supporters, potential supporters, other CRCF stakeholders and potential stakeholders to support CRCF;
- \$ to establish and maintain lists of CRCF members, CRCF supporters and other CRCF stakeholders;
- \$ to establish and maintain subscriptions to publications of CRCF or related organizations;
- \$ to conduct surveys or research;
- \$ to publish a directory;
- \$ to compile statistical and historical information about CRCF members, CRCF supporters and other CRCF stakeholders;
- \$ to build and maintain relationships among stakeholders within CRCF;
- \$ to disclose information requested by third parties (with permission of CRCF members, CRCF supporters and other CRCF stakeholders);
- \$ to protect CRCF, you and others from fraud and error and to safeguard the interest of CRCF and its staff and representatives;
- \$ to authenticate your identity;
- \$ to ensure staff and contractors comply with their agreements and legal obligations to CRCF;
- \$ to administer relations with municipal, provincial, federal authorities, the Apostolic Church of Pentecost of Canada (“ACOP”) and other authorities and religious organizations with whom CRCF has relations from time to time;
- \$ to comply with Canada Revenue Agency requirements;
- \$ to comply with any legal or regulatory requirement; and
- \$ to use and disclose for any other purpose directly or indirectly related to the establishment or operation of CRCF.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with CRCF.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is permitted or required by law.

### 3. CONSENT

CRCF will obtain your consent to collect, use or disclose personal information except where CRCF is permitted or required by law to do so without consent. For example CRCF may collect, use or disclose personal information without your consent where:

- § CRCF reasonably expects that obtaining consent would compromise an investigation or proceeding;
- § CRCF's use of the information is for acting in an emergency that threatens a person's life, health or personal security;
- § CRCF is obtaining legal advice; or
- § CRCF needs to deal with an anticipated breach of law.

CRCF will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed.

Your consent may be express or implied and may be given through an authorized representative such as a lawyer or agent. If you are under the legal age, your consent may be obtained from a parent or guardian.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. CRCF may imply consent if the purpose for the collection of the information would be reasonably obvious to you and is given voluntarily by you for that purpose. Consent may also be implied where CRCF notifies you that CRCF intends to collect, use or disclose information and you do not decline CRCF's intended action within a reasonable period of time. The manner in which CRCF obtains consent for the collection of personal information will vary with the sensitivity of the information being collected.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided that CRCF is given reasonable written notice. CRCF will inform you of the likely consequences of the withdrawal of consent, which may include the inability of CRCF to provide products and

services to you.

#### **4. LIMITS FOR COLLECTING PERSONAL INFORMATION**

CRCF will only collect personal information that is reasonably necessary to provide products or services either directly or indirectly and which is reasonably necessary for the purposes which you consented to. CRCF will collect personal information by lawful means. CRCF may also collect information as permitted or required by law.

#### **5. LIMITS FOR USING, DISCLOSING AND KEEPING PERSONAL INFORMATION**

Your personal information will only be used or disclosed for the purpose for which it was collected. CRCF will not use personal information for any additional purpose unless CRCF seeks your consent to do so.

CRCF may periodically use your personal information to conduct surveys in order to enhance CRCF's provision of products and services.

CRCF will not sell member, supporter and other stakeholder lists or personal information to third parties.

Subject to applicable legal requirements, CRCF and ACOP may transfer information between each other.

CRCF will retain your personal information only so long as necessary for the identified purposes or for necessary legal or business purposes. CRCF will keep your personal information used to make a decision affecting you for at least one year after using it to make the decision. CRCF will also keep personal information that is the subject of a request by you for as long as is necessary to allow you to exhaust recourse with respect to this personal information. Once CRCF no longer has a reason to retain your personal information, CRCF will destroy, erase or make anonymous documents or the records containing personal information.

#### **6. ACCURACY**

CRCF will make reasonable efforts to ensure your personal information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, CRCF will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

CRCF will not routinely update your personal information unless it is necessary to fulfill the purposes for which it was collected. You may request amendments to the records at CRCF to

ensure the accuracy and completeness of your personal information. If the amendment request relates to information that remains in dispute, CRCF will note your opinion on the file.

## **7. SAFEGUARDING PERSONAL INFORMATION**

CRCF is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

Depending on the sensitivity of your personal information, CRCF will employ appropriate security measures to protect the information. The measures may include, for example, the physical security of offices and data centres, the limiting of access on a “need-to-know” basis and the use of passwords and encryption.

CRCF will also use appropriate security measures when disposing of your personal information.

CRCF will require ACOP and other third parties through contractual or other reasonable means to safeguard your personal information entrusted to them in a manner consistent with the policies, procedures and practices of CRCF.

## **8. AVAILABILITY OF POLICIES AND PROCEDURES**

CRCF is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing. To ensure the integrity of our security procedures and business methods, CRCF may refuse to publically disclose certain information.

CRCF will make the following information available:

- \$ The name, title and address of the person accountable for the policies, procedures and practices and to whom complaints or inquiries can be provided;
- \$ A description of the type of personal information held by CRCF, including a general account of its use;
- \$ A copy of any brochures or other information that explain the policies, procedures and practices; and
- \$ An explanation of what personal information is made available to related organizations.

## **9. PROVIDING ACCESS TO YOUR PERSONAL INFORMATION**

You have a right to access your personal information held by CRCF. Upon request and confirmation of your identity, CRCF will, within a reasonable period of time, tell you what personal information it has, what it is being used for and to whom it has been disclosed. You may be asked to be specific about the information that you would like to access and to submit your request in writing. Depending on the type and amount of information requested, CRCF may charge you a reasonable fee for providing you with access to your information. Where a cost will be incurred by you, CRCF will inform you of the cost and request your direction on whether or not CRCF should proceed with the request.

CRCF will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, CRCF may not be able to provide access to certain personal information. The reasons for not providing this information may include that it is information that would threaten the life or security of another person, information generated in a formal dispute resolution process, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons and information that is subject to solicitor-client privilege.

If a request is refused, CRCF will notify you in writing, setting out the reasons for the refusal and resources for redress available to you.

If your personal information is demonstrated to be inaccurate or incomplete, CRCF will amend the information as required. Where appropriate CRCF will send the amended information to third parties to whom the information has been disclosed.

## **10. COMPLIANCE AND COMPLAINTS**

CRCF will, on request, provide you with information regarding its complaint response procedure.

You are to direct any complaints, concerns or questions regarding this policy in writing to the privacy officer. If the privacy officer is unable to address your concern, the issue can be referred to the Board of Directors of CRCF. At any point in this process you may also write to the Privacy Commissioner.

Contact Information:

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Cariboo Road Christian Fellowship  
7200 Cariboo Road  
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