
CENTRE STREET CHURCH
(A Federal Corporation)

GENERAL PRIVACY POLICY

Board Approval the 25th day of September, 2010

Marvin J. Fritzler, Chair

Shirley G. Yule, Secretary

Centre Street Church Inc.

(the "Church" or "we", "us", "our", etc.)

GENERAL PRIVACY POLICY

The Church is committed to maintaining the privacy of individuals and protecting personal information in its custody or control in accordance with privacy legislation applicable to the Church.

This Policy describes and summarizes the practices of the Church with respect to our collection, use and disclosure of personal information related to all individuals other than employees of the Church. Please note that, in this context, "employees" includes independent contractors to the Church, where such contractors are individuals. For information related to the policies of the Church with respect to its employees, the Church maintains a separate Employee Privacy Policy, a copy of which may be requested from the Church's Privacy Officer.

Among other things, this Policy describes the obligations, policies and practices of the Church under the *Personal Information Protection Act* (Alberta) and any other privacy legislation that may be applicable in specific circumstances. The Church reserves the right to amend this Policy from time to time, so reference should be made to the effective date above to ensure that the most recent version.

While the Church may choose, in any particular case, to go further than the law requires, the Church does reserve all its rights to rely on any available statutory exemptions or exceptions and nothing in this Policy should be taken to waive the Church's rights.

1. Definitions

In this Policy, the following terms have the meanings below:

- *Employee* means an employee of the Church, but also includes independent contractors (where such contractors are individuals) of the Church, as well as volunteers, students, and other individuals providing services to or on behalf of the Church).
- *Personal information* means information about an identifiable individual, which does not include information of an aggregate or anonymous nature where a specific individual or individuals cannot be identified. Personal Information also does not include business contact information, as long as business contact information is used to contact an individual in relation to their business responsibilities and not for other purposes.

- *Business contact information* means an individual's name and position or title as an official or employee of an organization, as well as their business telephone number, business address, business e-mail, business fax number and other business contact information. Business contact information includes the foregoing information about an employee of the Church.

2. Sources of Personal Information

The Church generally collects, uses and discloses personal information about the following types of individuals:

- Employees, for the purposes of establishing, managing and terminating employment, volunteer, student and contractor relationships.
- Members and adherents of the Church;
- Recipients of services offered or provided by the Church;
- Donors and supporters of the Church; and,
- Other individuals who may voluntarily choose to provide the Church with personal information.

3. Notification and consent

It is the Church's policy to collect, use and disclose personal information only for purposes that are reasonable.

Subject to this Policy and applicable legislation, the Church will identify the purposes for collection, use and disclosure in advance of collection. It is generally the policy of the Church to notify the individual of the purposes for collection, use or disclosure at or before the time of collection and to obtain the consent of the individual to the Church's collection, use or disclosure of their personal information.

There are a number of exceptions to the above. In some circumstances, such as with certain personal information related to employees, the Church does not require consent to collect, use or disclose personal information but is required to provide notification in advance. In other circumstances, specifically those set out in applicable legislation, such as investigations or legal proceedings, the Church may not be required to obtain consent or provide notification.

It is the policy of the Church to not make provision of personal information a condition to the Church providing a service, except to the extent that the personal information is reasonably required to provide that service.

Consent may be withdrawn or revoked at any time. Should consent to our collection, use, disclosure or retention of personal information be revoked by the individual in question, the law also allows us to continue to retain the information for as long as is reasonable for legal or business purposes. In the event that revocation of consent may have consequences to the individual concerned, we will advise the individual of the consequences of revoking their consent where it is reasonable in the circumstances to do so.

4. Exceptions to the requirement for consent

The Church may collect, use and disclose personal information without consent in circumstances that generally include but are not limited to the following:

- Business contact information may be collected, used and disclosed without the consent of the individual provided the information is used only to contact the individual in relation to their business responsibilities in their capacity as an employee or official of an organization;
- Where a reasonable person would consider that the collection, use or disclosure of the information is clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way, or the individual would not reasonably be expected to withhold consent;
- Where the collection, use or disclosure of the information is pursuant to a statute or regulation of either Alberta or Canada that authorizes or requires the collection, use or disclosure;
- Where applicable law requires the collection, use or disclosure;
- Where the information is collected from a public body and that public body is authorized or required by an enactment of Alberta or Canada to disclose the personal information to the Church, provided that Church will only use or disclose such information as permitted by law;
- Where the collection, use or disclosure of the information is reasonable for the purposes of an investigation or a legal proceeding;
- Where the information collected is publicly available from a prescribed source, provided that Church will only use or disclose such information as permitted by law; and
- Where the collection, use or disclosure of the information is necessary in order to collect a debt owed to the Church or for the Church to repay to an individual money owed by the Church.

In addition to the above, the law generally provides that an individual is deemed to consent to the collection, use or disclosure of personal information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information. If you provide personal information to us voluntarily, we will rely on deemed consent and consider that you consent to our collection, use or disclosure of your personal information as necessary to carry out the purposes for which you provided the information.

Where a new purpose for the use or disclosure of personal information previously collected arises, it is generally the policy of the Church to contact the individual in question to obtain any further required consent or to provide any further required notification for use or disclosure for such new purpose or purposes.

Where practical, the Church will try to collect personal information directly from the individual. Where necessary, the Church will collect personal information from other sources. When the Church collects personal information about individuals directly from them, except when their consent to the collection is deemed or has otherwise been previously and lawfully obtained, or is not required, we will tell individuals the purpose for which the information is collected, and, where required to do so, the name of a person or the title or position name of a representative of the Church who can answer questions about the collection.

5. Why the Church collects, uses and discloses personal information

The Church generally collects, uses and discloses personal information for the following purposes:

- Employees:
 - To recruit and hire, and to establish, maintain, manage and terminate an employment, volunteer, student or contractor relationship. For further information, the Church's Employee Privacy Policy should be consulted.
- Members and Adherents of the Church:
 - To communicate information about the Church and Church events and matters;
 - To establish and maintain our contacts lists and database;
 - To interact and communicate with members and adherents as requested, required or appropriate;
 - To provide services and information to members and adherents;

- To generally manage the relationship between the Church and its members and adherents;
- To obtain information about members and adherents and disclose information to third parties in order to carry out the foregoing.
- Recipients of services offered or provided by the Church:
 - To provide services;
 - To refer individuals to other providers of services or sources of assistance as required;
 - To establish and maintain our contact lists and database about recipients of services;
 - to obtain information about recipients of services and disclose information to third parties in order to carry out the foregoing.
- Donors or supporters of the Church:
 - To communicate information about the Church and Church events and matters;
 - To establish and maintain our contact lists and database;
 - To interact and communicate with donors as requested, required or appropriate;
 - To process payment of donations and provide receipts and related documentation;
 - To make any disclosures required by law.
- Other individuals:
 - To respond to requests for information or requests for contact by the Church;
 - To communicate information about the Church and Church events and matters;
- To fulfill the legal obligations of the Church.

Other purposes may arise or be identified from time to time, and may be communicated to individuals at the time of obtaining consent or otherwise as may be reasonable in the circumstances.

6. Privacy and our website

We do not collect any personal information from you when you simply visit our website. However, you should be aware that most web servers do collect some information about visitors, such as the browser and version you are using, your operating system, and your "IP" or internet address, which may identify your Internet Service Provider or computer but normally not the person using it.

If you voluntarily submit personal information to us by email for purposes of obtaining information, we will consider that you have done so with your consent for purposes reasonably related to your providing the information. If reasonable to do so, after our initial response, we may send further information to you with information that may be useful, but we will include instructions on how to terminate receiving such further information. Please be advised that the Internet and email are inherently insecure media, and we cannot take responsibility for the security or privacy of personal information in transit over the Internet.

Please also note that our website may contain links to other websites which are provided as a convenience for visitors to our website only. Any third party websites will have their own privacy policies and practices, and we cannot be responsible for such third parties or their websites.

7. Donations

Any collection, use or disclosure of personal information through our website, or otherwise, with respect to payment and receipt of donations, will be subject to this Policy, unless otherwise communicated to the individual at the time of payment or donation.

8. Mailing and Distribution Lists

The Church maintains mailing and distribution lists in order to provide and periodically distribute information to interested individuals, including members of the Church, recipients of services from the Church, donors and other supporters of the Church, and any other interested individuals, with their consent. Recipients of information from the Church may withdraw their consent at any time. It is the policy of the Church to provide a mechanism for withdrawing consent to receiving information from the Church. The Church does not share or sell its mailing or distributions lists. In any circumstances where personal information is shared with other organizations, such as other ministries, any disclosure of personal information to other organizations is made with the consent of the affected individuals, or otherwise as permitted or provided by law.

9. Accuracy and Completeness

When we collect, use or disclose personal information, particularly where the information is used to make a decision affecting an individual, the Church will make reasonable efforts to ensure that the information is accurate, up to date, and complete. This may involve requesting further information or updates from the individual in question. Individuals are expected to advise us of changes to their personal information so that our records may remain current.

10. Retention and destruction of personal information

Alberta law allows the Church, for legal or business purposes, to retain personal information for as long as is reasonable. Upon expiry of an appropriate retention period, bearing in mind reasonable legal and business requirements, personal information will either be destroyed in a secure manner or made anonymous. There are legally required minimum retention periods, which the Church must and does observe.

11. Outsourcing

The Church may use third party service providers to process or deal with personal information on behalf of the Church. In order to protect the confidentiality and security of personal information processed on behalf of the Church by its service providers, the Church will use contractual and other measures with such service providers.

In the event that the Church uses service providers outside Canada to process or collect, use or disclose personal information about an individual on behalf of the Church, the Church will notify the individual about such service providers outside of Canada. The Church will also notify the individual of the way in which the individual may obtain access to written information about the Church's policies and practices with respect to service providers outside of Canada and the name or title of a person who can answer any questions about the collection, use, disclosure or storage of personal information by any service providers outside Canada.

12. Security

We recognize our legal obligations to protect the personal information we have gathered about individuals. We have therefore made arrangements, including arrangements with our outsourced service providers as mentioned above, to secure against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information. These arrangements may include physical security measures, network security measures, and organizational measures such as non-disclosure agreements and need-to-know access.

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

13. Requests for Access to Personal Information

Alberta law permits individuals to submit written requests to us to provide them with:

- access to their personal information under the custody or control of the Church;
- information about the purposes for which their personal information under the custody or control of the Church has been and is being used; and
- the names of organizations or persons to whom and the circumstances in which personal information has been and is being disclosed by the Church.

Requests for access are subject to the following:

- Any requests must be in writing;
- We do not accept such requests or respond to such requests via email;
- In order to receive a response to such a request, the individual must provide us with sufficient information to locate their record, if any, and to respond to them;
- We will respond to requests in the time allowed by Alberta law, which is generally 45 days;
- We will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible;
- All requests may be subject to any fees and disbursements the law permits us to charge; and
- Where appropriate to do so, we may require advance payment of a deposit or the entire costs of responding to a request for access to personal information.

Please note that an individual's ability to access his or her personal information under our control is not an absolute right. Alberta law provides that the Church *must not* disclose personal information where:

- The disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- The disclosure would reveal personal information about another individual; or
- The disclosure would reveal the identity of an individual who has in confidence provided us with an opinion about another individual and the individual providing the opinion does not consent to the disclosure of his or her identity.

Alberta law also provides that the Church *may choose not to* disclose personal information where:

- The personal information is protected by any legal privilege;
- The disclosure of the information would reveal confidential commercial information and it is not unreasonable to withhold that information;
- The personal information was collected by the Church for an investigation or legal proceeding;
- The disclosure of the personal information might result in similar information no longer being provided to us when it is reasonable that it would be provided; and
- In some circumstances, where the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration, or where personal information relates to or may be used in the exercise of prosecutorial discretion.

14. Responses to Requests

Our responses to requests for access to personal information will be in writing, and will confirm:

- Whether we are providing all or part of the requested information,
- Whether or not we are allowing access or providing copies of any records containing the requested information, and,
- If access is being provided, when and how that will be given.

Where a record in the custody or control of the Church contains information the Church cannot provide, or is entitled to choose to not provide, the Church will, where possible and reasonable to do so, redact the information not provided and provide the remaining information to the individual.

If access to information or copies are refused by us, we will provide written reasons for such refusal and the section of PIPA (the *Personal Information Protection Act*, Alberta) on which that refusal is based. We will also provide the name or position title of an individual at the Church who can answer questions about the refusal, and particulars of how the requesting individual can ask the Information and Privacy Commissioner of Alberta to review our decision. In order to receive a response to such a request, the individual must provide us with sufficient information to locate their record, if any, and to respond to them.

15. Requests for Correction

Alberta law permits individuals to submit written requests to us to correct errors or omissions in their personal information that is in our custody or control. If an individual alleges errors or omissions in the personal information in our custody or control, we will either:

- Correct the personal information and, if reasonable to do so, and if not contrary to law, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- Decide not to correct the personal information but annotate the personal information that a correction was requested but not made.

Corrections or amendments will rarely, if ever, be made to opinions, including expert or professional opinions, as opposed to factual information, which may be corrected if in error.

16. Amendment

The Church may amend this Policy from time to time as required and without notice, in order to better meet our obligations under the law.

17. Contacting the Church

If you have any questions with respect to our policies concerning the collection, use, disclosure or handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, or if you are dissatisfied with how we handle your personal information, please contact our Privacy Officer Jeff Wimmer at:

by mail:	Centre Street Church 3900 2 nd Street NE Calgary, AB T2E 9C1	by phone:	403.293.3900
		by fax:	403.520.2698
		by email:	privacy@cschurch.ca

If you remain dissatisfied after our Privacy Officer has reviewed and responded to your concern, or have other concerns or questions, you have the right at any time to contact the Office of the Information and Privacy Commissioner at:

410, 9925 - 109 Street
Edmonton, AB T5K 2J8
Telephone (780) 422-6860 or Fax (780) 422-5682