

**Privacy Policy of Trinity Bible Chapel  
Adopted by Elders on October 25, 2017**

Trinity Bible Chapel (“Trinity” or TBC) is committed to safeguarding the personal information entrusted to us. We manage personal information in accordance with Canada’s *Personal Information Protection and Electronic Documents Act* and other applicable laws.

This privacy policy (this “**Policy**”) outlines the principles and practices we follow in protecting your personal information. A copy of this Policy is available to anyone upon request.

***Application***

This Policy applies to the collection, use and disclosure of personal information by Trinity. “Personal information” means information about an identifiable individual, recorded or not, such as an individual’s name, address, telephone number and e-mail address. This Policy does not apply to business contact information.

***What personal information do we collect?***

We collect only the personal information that we need for the purposes of providing services and issuing receipts for donations.

***Consent***

We ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.

***How do we use and disclose personal information?***

We use and disclose personal information only for the purpose for which the information was collected, except as authorized by law.

***Access to records containing personal information***

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Trinity, unless doing so would conflict with law or violate the privacy of another individual under this Policy.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to Trinity Bible Chapel’s Compliance Officer (see below). You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will try to respond to your request within 45 calendar days, barring unusual circumstances. While usually there is no fee, if we incur more than nominal costs in responding to your request (other than to correct information), we may tell you in advance and then charge a small fee to cover our costs to process your request.

### ***Questions and complaints***

If you have a question or concern about any collection, use or disclosure of personal information by Trinity Bible Chapel, or about a request for access to your own personal information, please contact Trinity's Compliance Officer (see next section).

### ***Trinity Bible Chapel's Personal Information Compliance Officer***

The current administrative assistant is Trinity's personal information compliance officer (the "**Compliance Officer**"), whose mandate includes ensuring that Trinity complies with all applicable privacy laws.

You may contact the Compliance Officer at:

Trinity Bible Chapel  
c/o Administrative Assistant  
1373 Lobsinger Line  
Waterloo, ON N2J 4G8

The role and responsibility of the Compliance Officer are described in more detail below. The Compliance Officer is given the authority to amend our Policy from time to time to reflect compliance with the law and the following general principles.

### ***General Principles***

#### **1. Accountability**

- 1.1 All persons, whether employees, volunteers, or board or team members who collect, process, or use personal information shall be accountable for such information to the Compliance Officer.
- 1.2 Any personal information transferred to a third party is subject to this Policy. The Compliance Officer shall use contractual or other appropriate means to protect personal information at a level comparable to this policy while a third party has this information.
- 1.3 Personal information to be collected is done so only using applications and forms approved by the Compliance Officer. All methods of retention of information are according to the Compliance Officer's instructions.
- 1.4 Any person who believes Trinity uses personal information collected, retained, or used for purposes other than those that person explicitly approved may contact the Compliance Officer to register a complaint or to make any related inquiry.
- 1.5 Upon receiving a complaint from any person regarding the collection, retention, or use of personal information, the Compliance Officer shall promptly investigate the complaint and notify the person who complained about his/her findings and corrective action taken, if any.

1.6 Upon receiving the response from the Compliance Officer, the person who filed the complaint may, if he/she is not satisfied, appeal to Trinity Bible Chapel's Board of Elders to review and determine the disposition of the complaint at issue.

1.7 The Compliance Officer shall communicate and explain this policy and give training regarding it to all employees and volunteers who might be in a position to collect, retain, or use personal information.

## **2. Identifying Purposes**

2.1 The Compliance Officer shall document the purpose for which personal information is collected to comply with the openness principle below.

2.2 The Compliance Officer shall ensure that only information needed to fulfill purposes for which the information is to be collected is asked for on the forms/applications Trinity uses.

2.3 The Compliance Officer shall ensure that the purpose is implied or specified at or before the time of collecting the personal information from an individual.

2.4 The Compliance Officer shall ensure that the information collected will not be used for any other purpose before obtaining the individual's approval, unless the new purpose is required by law.

2.5 The Compliance Officer shall ensure that a person collecting personal information will be able to explain to the individual why this is being done.

## **3. Consent**

3.1 The Compliance Officer shall ensure that the individual from whom personal information is collected consents to this and to it being used and disclosed as required by law.

3.2 The Compliance Officer shall ensure that the individual can reasonably understand why and how the information will be used when the consent is given.

3.3 The Compliance Officer shall ensure that where implied consent cannot be assumed, express consent is obtained wherever possible and appropriate.

3.4 The Compliance Officer shall ensure that the express consent obtained from an individual is clear and in an appropriately verifiable form whether it be paper form or electronic form.

3.5 The Compliance Officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The individual shall promptly be informed of the withdrawal's implications.

## **4. Limiting Collection**

4.1 The Compliance Officer shall ensure that personal information will not be collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfill the purposes identified.

4.2 The Compliance Officer shall ensure that information is collected only by fair and lawful means.

## **5. Limiting Use, Disclosure, and Retention**

- 5.1 The Compliance Officer shall ensure that personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law, and any use of personal information shall be properly documented.
- 5.2 The Compliance Officer shall ensure that all personal information is destroyed, erased, or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. Except as required to be retained by law, all personal information shall be deleted, erased, or made anonymous no later than seven years after the purpose for which it was collected has been completed.

## **6. Accuracy**

- 6.1 The Compliance Officer shall ensure that the information is sufficiently accurate, complete, and up to date to minimize the possibility that inappropriate information might be used to make a decision about an individual.
- 6.2 The Compliance Officer shall ensure that Trinity does not routinely update personal information, unless it is necessary to fulfill the purposes for which the information was collected.
- 6.3 The Compliance Officer shall ensure that personal information used on an ongoing basis, including information that is disclosed to third parties, should generally be accurate and up to date.

## **7. Safeguards**

- 7.1 The Compliance Officer shall ensure that Trinity Bible Chapel has security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.
- 7.2 Depending on the information's sensitivity, the Compliance Officer may permit reasonable discretion regarding the information that has been collected: the amount, distribution, format, and the method of storage. A higher level of protection shall safeguard more sensitive information according to the consent principle's considerations.
- 7.3 The Compliance Officer shall ensure that the protection methods include,
  - (a) physical measures, for example, locked filing cabinets and restricted access to offices;
  - (b) organizational measures, for example, security clearance and limiting access on a "need-to-know" basis; and
  - (c) technological measures, for example, the use of passwords and encryption.
- 7.4 The Compliance Officer shall ensure that all employees and volunteers know the importance of keeping personal information confidential.
- 7.5 The Compliance Officer shall ensure that care is taken when personal information is disposed of or destroyed to prevent unauthorized parties from gaining access to it.

## **8. Openness**

- 8.1 The Compliance Officer shall ensure that Trinity is open about its policies and practices regarding the management of personal information, and such information will be made available without unreasonable effort in a form generally understandable.

- 8.2 The Compliance Officer shall ensure that the information available shall include,
- (a) the name or title and address of the Compliance Officer who is accountable for Trinity Bible Chapel's policies and practices and to whom complaints or inquiries can be forwarded;
  - (b) the means of gaining access to personal information held by Trinity;
  - (c) a description of the type of personal information held by Trinity, including a general account of its use;
  - (d) a copy of any brochures or other information that explain Trinity's policies, standards, or codes; and
  - (e) what personal information is made available to related organizations (e.g., organizations that are affiliated).

## **9. Individual Access**

- 9.1 The Compliance Officer shall ensure that upon request Trinity Bible Chapel shall inform an individual whether Trinity holds personal information about him/her. Trinity shall allow the individual access to this information. Trinity may, however, choose to make sensitive medical information about its employees or volunteers available through a medical practitioner. Trinity shall also account for the use that has been made or is being made of this information and give an account as to the third parties to whom it has been disclosed. (Note, if the Compliance Officer believes for valid reasons that access to personal information should be denied, he/she shall consult legal counsel before making such a decision.)
- 9.2 A person requesting his/her personal information may be required by the Compliance Officer to give sufficient information to permit Trinity to provide an account of the existence, use, and disclosure of personal information. Information shall be used only for the purpose for which it was obtained.
- 9.3 If Trinity has supplied personal information about an individual to third parties, the Compliance Officer shall ensure that an attempt is made to be as specific as possible. When to give a list of the organizations to which it has actually disclosed information about an individual is impossible, Trinity shall provide a list of organizations to which it might have disclosed information about the individual.
- 9.4 The Compliance Officer shall ensure that Trinity responds to an individual's request within a reasonable time and at minimal or no cost to the individual. The requested information shall be made available in a generally understandable form. For example, Trinity Bible Chapel shall explain abbreviations or codes it uses to record information.
- 9.5 The Compliance Officer shall ensure that when an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Trinity shall amend the information as required. Depending on the information challenged, amendment involves the correction, deletion, or addition of information. When appropriate, the amended information shall be transmitted to third parties having access to the information in question.
- 9.6 The Compliance Officer shall ensure that when a challenge is not resolved to the individual's satisfaction, Trinity shall record the unresolved challenge's substance. When appropriate, the unresolved challenge's existence shall be transmitted to third parties having access to the information in question.

## **10. Challenging Compliance**

- 10.1 The Compliance Officer is authorized to address a challenge concerning compliance with the above principles.
- 10.2 The Compliance Officer shall develop procedures to receive and respond to complaints or inquiries about the policies and practices regarding the handling of personal information. The compliance procedures shall be easily accessible and simple to use.
- 10.3 The Compliance Officer shall inform individuals inquiring about lodging complaints that relevant complaint procedures exist.
- 10.4 The Compliance Officer shall investigate all complaints. If a complaint is found to be justified, the Compliance Officer shall take appropriate measures, including, if necessary, amending Trinity's policies and practices.