

**Policy Title: Privacy**  
**Policy Number: 21**  
**Policy Author: Lillian Boyd**

**Approval Date: November 20, 2016**  
**Effective Date: November 20, 2016**  
**Last Review/Revision Date: May 15, 2018**

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#### **Purpose of the Policy:**

This policy defines the standards that Springvale will maintain to ensure the safety and privacy of any personal information that Springvale collects.

#### **Policy Scope:**

This policy applies to any personal information that is collected for a variety of purposes including, but not limited to,

- providing services to individuals ministered to by Springvale;
- establishing and maintaining members lists;
- managing payroll and benefits;
- employee performance evaluations;
- establishing and maintaining lists of donors.

#### **Policy Statements:**

In accordance with applicable laws, Springvale is committed to protecting the privacy of its members, adherents, donors, volunteers, employees, directors, officers and any other persons about or from whom Springvale collects personal information.

The Church embraces the principles of the Canadian Standards Association *Model Code for the Protection of Personal Information* to ensure that all personal information is properly collected, used only for the purposes for which it is collected and is disposed of in a safe and timely manner when no longer required.

1. **Accountability:** Springvale is responsible for maintaining and protecting the personal information under its control. The Church has appointed a Privacy Officer who is responsible to ensure that the Church complies with its privacy obligations in accordance with applicable privacy laws.
2. **Identifying Purposes:** Springvale shall identify and explain the purposes for which it collects personal information, to the person from whom the personal information is being collected, before or at the time the information is collected.
3. **Consent:** Consent will be obtained from the person whose personal information is collected, used and disclosed, unless obtaining the consent would be inappropriate or not required by law. Sometimes the person's consent may be implied by virtue of their membership in Springvale or because of the person's conduct within Springvale. When it is appropriate, written consent will be obtained.

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Written consents will be kept on file for as long as the information is reasonably necessary. A person may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice. The person will be informed of reasonably foreseeable implications of the withdrawal.

4. Limiting Collection: Information collected will be limited to that required for the purpose or purposes identified by Springvale. Springvale is committed to collecting personal information in a fair, open and lawful manner.
5. Limiting Use, Disclosure and Retention: Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by the law. Nothing in this Privacy Policy prevents the elders or pastoral staff from collecting, retaining and using information related to individuals ministered to by Springvale, since such information assists in providing quality services to those ministered to.
6. Accuracy: Personal information shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purposes for which it was collected.
7. Safeguards: Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding could include physical measures such as locked filing cabinets and premises security, organizational measures such as restricted access to files with personal information or technological measures such as security software.
8. Openness: Information regarding the privacy policy of Springvale, as well as the personal information management, shall be available as requested.
9. Access to Personal Information: Access to personal information will be granted, where Springvale is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contracts, to the person to whom the information pertains where there is an appropriate written request. The existence, use and disclosure of the personal information will be granted within a reasonable period of time. Any inaccuracy or incompleteness of personal information will be amended as required.
10. Challenging Compliance: Complaints or inquiries about the collection, use, disclosure or retention of personal information and Springvale's compliance with these ten principles should be directed to the Privacy Officer. The Privacy Officer will investigate complaints and ensure that appropriate measures are taken.

**Definitions:**

**Related Documents:**