

VALLEYVIEW MENNONITE CHURCH PRIVACY POLICY DOCUMENT

General Information about Privacy

VMC refers to Valleyview Mennonite Church

Participants of VMC have the right to protection of personal information. The VMC Privacy Policy outlines our principles and procedures regarding the confidentiality and security of participants' personal information. The development of VMC's policies and procedures for the protection of personal information is an ongoing process.

VMC has developed policies and procedures:

- To protect personal information
- To educate the Board members, Church Council Committee members and staff on matters concerning personal information
- To receive and respond to inquiries and concerns
- To communicate this policy to church participants

Definitions:

“Collection” – the act of gathering, acquiring, or obtaining personal information from any source, including third parties.

“Consent” – involves voluntary agreement with what is being done or proposed. Consent may be expressed or implied. Expressed consent can be given orally, electronically, or in writing. It is unequivocal, and does not require any inference on the part of VMC. Implied consent exists when VMC can reasonably infer consent based upon action or inaction of the member.

“Participant” – is any individual who is a baptized member or participant in church life at VMC.

“Disclosure” – the act of making personal information available in the public domain.

“Use” – the treatment and handling of personal information by and within VMC.

“Personal Information” - information about an identifiable individual that is recorded in any form.

“Third Party” – an individual or organization other than VMC and the participant.

“Privacy Officer” – an individual who is a member of the Board. The VMC Privacy Officer is responsible for monitoring compliance of the VMC Privacy Policy. The Officer will be named at the first Board meeting.

Section 1: VMC Accountability

1.1 VMC is accountable for the protection of the personal information that it collects from its participants. The Board is responsible for ensuring the protection of this personal information. A Board member will be the Privacy Officer.

Section 2: Purposes of Personal Information

2.1 VMC will communicate the purposes for which information is being collected.

2.2 VMC collects personal information for the following reasons and purposes:

- To provide church related services
- To provide emergency health care
- To ensure a safe and secure environment
- To develop religious programming
- To contact our participants directly
- To verify a participant's identity
- To maintain a historical record
- To meet regulatory requirements

Section 3: Consent

3.1 VMC will obtain consent to collect, use or disclose any personal information except where detailed in this policy. **VMC** will make reasonable efforts to ensure participants understand how personal information will be used and disclosed.

3.2 A participant's consent can be expressed, implied, or given through an authorized representative.

3.3 A participant may withdraw consent at any time.

3.4 VMC may collect, use, or disclose personal information without the participant's knowledge in exceptional circumstances as outlined below only:

- When such collection, use or disclosure is permitted or required by law
- When use of information is for acting in an emergency that threatens an individual's life, health or personal security
- When certain information is publicly available
- When we require legal advice from a lawyer

Section 4: Limits for Using, Disclosing and Keeping Personal Information

4.1 Information will be used or disclosed for the purpose for which it was collected.

4.2 VMC will retain personal information only as long as necessary or expected to be necessary for the identified purposes or as required by legislation.

4.3 VMC may disclose personal information related to a financial asset of **VMC** along with the transfer of the financial asset (e.g. Donation to other charitable organizations).

Section 5: Accuracy

- 5.1** VMC will make reasonable efforts to ensure that the participant's personal information is as accurate, complete and current as required for the purposes of which it was collected.
- 5.2** VMC will not routinely update information unless it is necessary to fulfill the purposes for which it was collected.
- 5.3** Participants may request amendments to the records at VMC in order to ensure the accuracy and completeness of personal information.

Section 6: Safeguards

- 6.1** VMC will use appropriate security safeguards to protect personal information. These may include:
 - Physical measures; such as locked filing cabinets, restricted access to offices;
 - Technical measures; such as passwords and personal identification numbers
 - Organizational measures; such as limiting access on a "need to know" basis.
- 6.2** VMC shall ensure that all employees and volunteers know the importance of keeping personal information confidential.
- 6.3** VMC shall ensure that appropriate security measures are taken when personal information is disposed or destroyed.

Section 7: Email and Website Privacy Policy

- 7.1** Changes in technology will necessitate ongoing reviews and updates to information protection policies.
- 7.2** If a participant has received a mailing from VMC, (a) the email address is either listed with VMC as someone who has expressly shared this address for the purpose of receiving information in the future ("opt-in"), or (b) the person has registered or otherwise had an existing relationship with VMC. VMC will respect the individual's time and attention by controlling the frequency of VMC mailings.
- 7.3** VMC uses security measures to protect against the loss, misuse and alteration of data used by our system.
- 7.4** VMC will never share, sell, or rent individual personal information with anyone without advance permission or unless ordered by a court of law.

- 7.5 Unless permission has been given by an individual, or in the case of a minor, the consent of the guardian of the individual, personal information contained on the **VMC** website will be displayed in such a manner as to protect the identity of the individual and act as a deterrent to any external security risk.

Section 8: Availability of Policies and Procedures

- 8.1 Policies and procedures that **VMC** uses to protect personal information will be made available upon request:
- The name and contact information of the Privacy Officer to whom inquiries can be made.
 - A description of the types of personal information held by **VMC** – See Appendix A
 - A copy of the Privacy Policy which explains our policies and procedures
 - An explanation of what personal information is made available to related organizations such as Church Conferences.

Section 9: Providing Participant Access to Personal Information

- 9.1 Participants have a right to access their personal information held by **VMC**. Upon request, **VMC** will, within a reasonable time period, disclose to the participant the personal information it has, for what it is being used, and to whom it is being disclosed, if applicable, and of the time period for which records are available.
- 9.2 Participants may be asked to specify information they would like to access and to submit their request in writing to the Privacy Officer at **VMC**.
- 9.3 Participants may be required to provide personal information to identify them to enable **VMC** to provide an account of the existence, use and disclosure of personal information.
- 9.4 **VMC** will make the information available within a reasonable time period. Should the information not be available within a reasonable time period from the date of the request, **VMC** will give notice, to the participant of an extension of time, advising of the reasons for the extended time period and of the right of the participant to make an appeal to the Board regarding this extension.
- 9.5 Where a cost will be incurred by **VMC** to make requested information available, the participant will be responsible for that cost. **VMC** will inform the participant of the cost and request direction from the participant on whether or not **VMC** is to proceed with the request.
- 9.6 In certain circumstances **VMC** may not be able to provide access to any or all personal information about a participant. In such cases, **VMC** will explain the reasons it will not provide the requested information and identify resources for

recourse available to the participant. The reasons for not providing information may include the following:

- Costs are unreasonable
- It is information that would threaten the life or security of another individual
- It is information that contains reference to other individuals
- It is information that cannot be disclosed for legal, security or commercial proprietary reasons
- It is information that is subject to solicitor-client or litigation privilege

Details of such situations will be documented.

Section 10: Pastoral Care Information

10.1 In the matter of Pastoral Care issues and the team affiliated with Pastoral Care, there will be absolute privacy unless the participant has granted permission to share. Information may be shared under exceptional circumstances as identified in Section 3.4.

Section 11: Compliance and Appeals

11.1 Participants are to direct questions, concerns or appeals regarding this policy to the Privacy Officer. If the Privacy Officer is unable to resolve the concerns they can be directed to all members of the Board.

APPENDIX A – attached

Appendix A

TYPE OF INFORMATION	DESCRIPTION OF INFORMATION	USE OF INFORMATION
Historic Membership Roll	Lists the name and date of when a person becomes a member of VMC, whether membership was by baptism, confession of faith, transfer, date of termination plus reason (transfer, withdrawal, death)	This list is used to develop an eligible voters list for congregational/corporate meetings and it is the definitive list of corporate members.
Church Telephone Directory	Names, address, telephone number, email addresses	For VMC participants to connect with the church community.
VMC email distribution lists	Congregation, Youth and FoodTeams email addresses	For VMC participants to connect with the church community.
Staff personnel files	Personal and employment information, contracts and performance reviews.	For employment purposes.
Board members and officers	Name, address, telephone number, date of birth, officer positions, Declaration of Not Being an Ineligible Individual	This is for the Corporate minute book, signing officers and filing with the Ontario Ministry of Government Services and Canada Revenue Agency.
Financial information	Name, address and amount donated. Banking information for automated withdrawals.	This is stored electronically by the treasurer in order to issue receipts.
Youth and Sunday School	Name, parent name(s), date of birth.	This is given to the Christian Education Committee to assign children to classes and give to the Pastoral Care Team for Milestone Ministries and Mentor Program.
Waiver and Medical Release forms	For all children and youth. Detailed health information in case of emergency.	This is used when emergency medical treatment is required and parents cannot be contacted. The forms are kept in the church office.
Police Checks	Personal identification information for police to	A list of names and date of completion is sent to the

Appendix A

	complete a search to ensure no criminal activity.	Board. Christian Education and Pastoral Care Team receive a list of names to ensure all volunteers have completed police checks.
Ministry Commitment Forms	Signed by volunteers to ensure they have read, understand and have been tested on the Safe Church Policy.	A list of names and date of completion is sent to the Board. Christian Education receives a list of names to ensure all volunteers have completed the ministry form.
Communication through Church Bulletin and Emails	Names, joys and concerns	Full names used in printed bulletin and members only area only area of the website. Last initials used in emails and public areas of website.
Committees	Committee members' names	This information is used for communications from individual committees, annual meeting nominating lists and annual reports.
Let's celebrate our Valleyview Family Form	Names, date of birth, date of anniversary	Celebrating birthdays and anniversaries – church bulletin and weekly update.
Transportation Policy Form	Name, date of birth, driver's license, information about insurance and driving record	This is used to ensure those that drive for Valleyview have a safe driving record and safe vehicle.
Wedding registrar	Information pertaining to those married at Valleyview	This is used to maintain a historical record of marriages at Valleyview
Funeral Planning Guide	Information to plan a funeral according to the deceased's wishes.	This is to provide personal directives for one's funeral

Revised policy approved at the April 22, 2017 board meeting