

DRAFT PRIVACY POLICY

OF

(Proper name of the Congregation)

INTERPRETATION

Throughout this Privacy Policy, *(proper name of the Congregation)* will be referred to as the “Congregation”, and “we” or “our” will refer to the Congregation.

COMMITMENT TO PRIVACY

The Congregation is dedicated to protecting your privacy and safeguarding your personal information. This Policy affirms our commitment to maintaining the privacy of our members and others. We have prepared The Policy in order to inform you of our practices concerning the collection, use and disclosure of personal information that has been provided to the Congregation.

We are committed to meeting or exceeding the privacy standards established by federal and provincial legislation, and our information-handling practices comply with the *Personal Information Protection and Electronic Documents Act* (Canada), and the *Personal Information Protection Acts* of Alberta and British Columbia.

This Policy applies to all of the activities and undertakings of the Congregation. This Policy is in effect as of *January 1, 2004*. The Congregation will, from time to time, review and revise its privacy practices and this Privacy Policy. In the event of any amendment, an appropriate notice will be posted on *(insert Congregation website address)*.

TEN PRIVACY PRINCIPLES

As part of our commitment to maintaining the accuracy, confidentiality and security of your personal information, we have established 10 privacy principles that govern our information-handling practices. Built on the values established by the Canadian Standard Association’s *Model Code for the Protection of Personal Information*, and Canada’s *Personal Information Protection and Electronic Documents Act*, these principles are:

1. Accountability

The Congregation is responsible for maintaining and protecting personal information under its control. In doing so, the Congregation is required to designate an individual or individuals to be accountable for the Congregation's compliance with the 10 privacy principles and the legislation and this Policy.

2. Identifying Purposes

Before or at the time that personal information is collected, the Congregation shall identify the purposes for which the information is collected.

3. Consent

A person's knowledge and consent are required for the collection, use or disclosure of personal information, except where required or permitted by law.

4. Limiting Collection

Personal information collected must be limited to those details that are necessary for the purposes identified by the Congregation. All information must be collected by fair and lawful means.

5. Limiting Use, Disclosure and Retention

Personal information may only be used or disclosed for the purpose for which it was collected unless an individual has otherwise consented, or when it is required or permitted by law. Personal information may only be retained for the period of time required to fulfill the purpose for which it was collected.

6. Accuracy

Personal information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purpose for which it is to be used.

7. Safeguarding Personal Information

Personal information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

8. Openness

The Congregation is required to give people access to information concerning the policies and practices that apply to the management of their information.

9. Individual Access

Upon request, persons shall be informed of the existence, use and disclosure of their information, and be given access to it. Persons may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate.

10. Handling Individual Complaints and Suggestions

Persons may direct any questions or inquiries, with respect to the privacy principles outlined above, or about our practices, by contacting the designated person(s) accountable for privacy at the Congregation.

WHAT INFORMATION IS COLLECTED?

Personal information is information that refers to you specifically. With your consent, personal information may be gathered from you personally, on the telephone, through the mail or over the internet. The information often collected and maintained by the Congregation office includes your:

- name,
- mailing address,
- e-mail address,
- telephone number,
- date of birth,
- place of employment,
- photographs,
- baptismal records,
- marriage records,
- burial records,
- classes and groups with the Congregation,
- Congregation boards, committees and officers,
- charitable contributions and pledges,
- list of talents and areas of interest, and
- attendance and communion records.

Most information has come to us directly from you, with your consent. The information we request depends upon the project, committee or purpose disclosed to you at the time your personal information was provided. We are only able to collect the personal information needed in order to achieve the disclosed purpose. We may, from time to time, ask for additional personal information. This additional information will be used for the project, committee or purpose previously disclosed to you.

The choice to provide personal information is always yours.

(for Alberta Congregations ONLY). All personal information about you that was acquired prior to January 1, 2004 is deemed to have been collected with your consent and may be used or disclosed by the Congregation for the purposes for which the information was collected. Personal information collected prior to January 1, 2004, is to be treated in the same manner as personal information collected after that date.

HOW YOUR INFORMATION IS USED

The Congregation uses personal information to communicate with you and to send information regarding our mission and ministry, and that of Lutheran Church – Canada, The Alberta-British Columbia District, Lutheran Church – Canada, and their respective agencies and affiliates.

We may also request information from you to assist us in making mission and ministry decisions. The Congregation may also use personal information to assess the strengths and weaknesses of workers and volunteers so that we are able to match a congregation's needs with a worker's strengths.

We use personal information to keep you advised of our activities, to send you important notices, and to respond to special needs or inquiries. We may also use it to send you information regarding:

- ministry resources and services,
- selected third-party suppliers,
- Congregation financial initiatives,
- estate planning information,
- continuing education opportunities,
- the source of books, services and merchandise which are available by various vendors, and
- the provision of gifting opportunities.

We also use personal information to record the history of our Congregation. Our history may be shared with Lutheran Church – Canada, The Alberta-British Columbia District and Lutheran Church – Canada. This historical information will be made available to the public through the Lutheran Historical Institute.

In certain situations, sensitive personal information may be required to provide specific financial services. This type of personal information will not be made available to others for any purpose other than to address the specific service requested.

The Congregation may only use your personal information for the purposes that we have disclosed to you. If for any reason information is required to fulfill a different purpose, we will notify you and ask you for your consent before proceeding.

DISCLOSING INFORMATION TO OUTSIDE PARTIES

The Congregation keeps personal information confidential at all times, except:

When you have authorized disclosure.

If you consent to a disclosure of personal information, then we may make the disclosure.

When required by law.

In some circumstances we are required to disclose your personal information because it is required by law. Only the information specifically requested is disclosed. We also take precautions to ensure that authorities making a request have legitimate grounds to do so.

When permitted by law.

There are some situations in which we are legally permitted to disclose personal information. We may disclose information, for example, in a medical emergency, where there is a suspicion of illegal activities, or where disclosure would be reasonable for archival purposes.

Sharing your information.

The Congregation and its employees and service suppliers are all governed by strict policies that ensure your information is kept secure and treated with the utmost care and respect. Information may be shared with Lutheran Church-Canada, The Alberta-British Columbia District and Lutheran Church – Canada. With your consent, however, information may be shared with other congregations and partner churches of Lutheran Church-Canada (including Evangelical Lutheran Church in Canada and Lutheran Church Missouri Synod and other Lutheran Church organizations throughout the world. In addition, with your consent, information may be shared with our chosen suppliers who perform services on our behalf.

Unless you authorize us to release it, or release is required or permitted by law, we will never sell, lease or trade your personal information to other parties.

WHO HAS ACCESS TO YOUR INFORMATION

Congregation employees and volunteers.

For the purpose of this section, the term “employees” includes volunteers. In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized officers or employees who have a legitimate purpose and reason for accessing it. As a condition of employment, all employees of the Congregation must respect and adhere to our established privacy standards. They must also work within the principles of ethical behaviour as set out in our internal employee rules and follow all applicable laws and regulations.

Employees are informed of the importance of privacy and are required to acknowledge that disclosure of personal information to unauthorized individuals or parties is prohibited. To

reinforce their understanding to our commitment to privacy, employees periodically receive updated literature about our privacy policy, principles and standards.

Unauthorized access to or disclosure of personal information by any Congregation employee or officer is prohibited. Employees and officers are expected to maintain the confidentiality of personal information at all times. Failure to comply will result in appropriate disciplinary measures, which may include dismissal.

Lutheran Church – Canada and Lutheran Church – Canada, The Alberta-British Columbia District

As indicated above, personal information may be shared with Lutheran Church – Canada or Lutheran Church – Canada, The Alberta-British Columbia District to be used and disclosed largely for the same purposes as the Congregation. Each of Lutheran Church – Canada and Lutheran Church – Canada, The Alberta-British Columbia District have their own privacy policies and their respective employees and volunteers are governed by procedures and processes designed to protect the privacy and security of your personal information.

Outside service suppliers.

Outside organizations are sometimes contracted by the Congregation to perform special services. An example of such an outside organization would be a computer consultant engaged to improve, maintain or repair our computer system. At times, these service suppliers may be responsible for processing and handling some information we receive from you. In these cases, suppliers are given only information needed to perform the required service – such as computer system maintenance.

All suppliers are bound by strict contractual obligations designed to protect the privacy and security of your information. They are prohibited from storing, analysing or using customer information for any purpose other than the service they have been contracted to provide. Furthermore, as part of our contract agreements, both our suppliers and their employees are required to protect your information in a manner that is consistent with the policies and practices established by the Congregation.

SAFEGUARDING YOUR INFORMATION

The Congregation uses technologies and maintains current security standards to ensure that personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. All safety and security measures are appropriate to the sensitivity of the information.

ACCESSING AND AMENDING YOUR INFORMATION

It is important that your personal information be accurate and complete. You have the right to access, verify and amend personal information held by the Congregation in its files.

To help us keep your personal information current, we encourage you to make corrections whenever necessary. Should you identify any incorrect or out-of-date information in your file(s), we will make the necessary changes and provide you with a copy of the corrected information. If appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us. To amend your personal information, please call us at *(insert Congregation telephone number)*.

QUESTIONS, CONCERNS AND COMPLAINTS

If you have any questions about our privacy policies as published in this statement, or have any complaint about privacy, confidentiality or the information handling practices of the Congregation, our employees, officers, volunteers or service suppliers, please call us at *(insert Congregation telephone number)*.

Should you not wish us to share informational materials, or have your personal information shared in the manner indicated in this Policy:

Write to us at:

(insert address of Congregation).

Call us at *(insert Congregation telephone number)*.

E-mail us at *(insert email address)*.

DRAFT

(proper name of Congregation)

**PERSONAL INFORMATION
CONSENT FORM**

In compliance with privacy legislation, we need to obtain your consent before collecting, using or disclosing your personal information.

We require the information for purposes of mission and ministry, to communicate with you and for the purposes set forth in our Privacy Policy. Our Privacy Policy is available upon request.

Except as indicated above, we will not disclose any personal information to anyone other than:

- where permitted or required by law or court order; or
- to a public authority, to aid in an investigation, or where an imminent danger could be avoided by disclosing the information.

You have the right to access, verify and amend the personal information with us. To amend your personal information, or if you have any questions or concerns, please call us at *(insert Congregation phone number)*.

You may withdraw or vary this consent at any time by giving us notice at *(insert Congregation address)*, such notice to be effective on the day following receipt.

I hereby consent to the collection, use and disclosure of my personal information as described above.

Signature: _____

Date: _____

PRACTICAL STEPS TO TAKE

Notes

1. Audit Personal Information Practices

a. what personal information do we collect?

b. what personal information do we need to provide the service or product we offer?

c. is it necessary to collect all the personal information we do?

d. if not, why do we collect the extra personal information? (i.e. what do we do with it?)

e. do we want to continue collecting the extra personal information?

f. if so, should we give the option to opt out?

g. do we disclose personal information?

h. to whom do we disclose it?

i. is it necessary to disclose it?

j. if not, do we want to continue disclosing it anyway?

k. should we give the option of opting out of the disclosure?

l. where and how do we store personal information?

m. who has access to it?

n. how long do we retain personal information?

o. do we ever destroy it?

p. can we destroy it? should we destroy it? do we need to keep it?

q. how would we gather personal information if someone wanted to access it?
