



PRIVACY POLICY

Approval Date: March 15, 2019
Approved by: EFCC Board of Directors
Recommended by Finance and Audit Committee
Policy Number: 2.3



The Evangelical Free Church of Canada

Purpose:

The purpose of this policy is to safeguard the personal information entrusted to the EFCC by its constituents and to comply with the Personal Information Protection and Electronic Documents Act (“PIPEDA”) and any other applicable legislation.

Scope:

This policy applies to **all constituents of the EFCC**.

Policy:

The EFCC is committed to respecting the privacy of personal information for all of its employees, officers, volunteers, candidates, donors, and contacts (hereafter, **constituents**). As a commitment to this privacy and in voluntary compliance with British Columbia’s *Personal Information Protection Act* (PIPA) and the Federal Government’s *Personal Information Protection and Electronic Documents Act* (PIPEDA), we have created the following Privacy Policy (the Policy).

All directors, officers, employees, missionaries and volunteers of the EFCC, as well as all other persons or organizations who act for or on behalf of the EFCC are required to comply with the Policy and will be given access to personal information only for the purpose of fulfilling services for the EFCC ministries.

A. Accountability

- 1.** The EFCC is responsible for any personal information which we collect, use, or distribute and for any personal information in our custody or under our control.
- 2.** The EFCC Privacy Officer is responsible for overseeing the Policy as well as any inquiries, concerns or complaints relating to privacy matters. The Privacy Officer may designate one or more individuals within the EFCC to act on his or her behalf.
- 3.** The EFCC will continue to train staff and volunteers about this policy, as well as create and update procedures in accordance with the Policy to govern the handling of personal information.
- 4.** The EFCC will ensure the policy is available to the public (on the website) and when requested by an individual.



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B. Purposes for Collection of Personal Information

1. Unless the purposes for collecting personal information are obvious and the constituent voluntarily provides his or her personal information for those purposes, the EFCC will, either before or at the time of collection, communicate the purposes for which it is being collected, used or disclosed.
2. The EFCC will limit the collection of personal information to that which is necessary to fulfill the following purposes:
 - To verify identity
 - To assess ongoing suitability for employment and/or licensing
 - To identify individual preferences
 - To understand individual needs
 - To provide requested products and/or services
 - To make contact for fundraising
 - To meet government requirements
 - To enter into a contract
 - To open and manage an account
 - To guarantee a travel or hotel reservation
 - To provide medical, dental, and/or counselling services
 - To send out information and correspondence

C. Consent for Personal Information

1. The EFCC will obtain constituent consent, when not implied, to collect, use or disclose personal information, except where we are authorized to do so without consent.
2. Consent can be provided orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the constituent voluntarily provides it for that purpose.
3. Consent can also be implied when a constituent is given notice of and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, e-links, and fundraising, but chooses not to opt out.
4. Subject to contractual or legal arrangements and reasonable notice, constituents can withhold or withdraw their consent for the EFCC to use their personal information at any time. A constituent's decision to withhold or withdraw their consent to certain uses of personal information may restrict



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the EFCC's ability to provide a particular service or product for them. The implications would then be communicated to the individual at the time.

5. The EFCC may collect, use or disclose personal information without a constituent's knowledge or consent in the following limited circumstances:
 - When it is permitted or required by law
 - In an emergency that threatens an individual's life, health, or personal security
 - When collection and use are clearly in the constituent's best interests and the EFCC is not able to obtain consent in a timely manner
 - When the personal information is available from a public source (e.g., a telephone directory) or at a public event the constituent attended voluntarily
 - When legal advice is required from a lawyer
 - For the purposes of collecting a debt
 - To detect and prevent (protect ourselves from) fraud
 - To investigate an anticipated breach of an agreement or a contravention of law

D. Limiting Collection, Use, Disclosure and Retention of Personal Information

1. The EFCC will limit the collection of personal information to that which is necessary to fulfill the identified purposes. The information will be collected by fair and lawful means.
2. The EFCC will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law.
3. The EFCC will not sell constituent lists or personal information to other parties.
4. If personal information is used to make a decision that directly affects the constituent, that personal information will be retained for at least one year so that the constituent has a reasonable opportunity to request access to it.
5. When personal information collected is no longer relevant to its purpose or when it is permitted by law, the EFCC will ensure that it is deleted, destroyed or made anonymous in a secure manner.

E. Accuracy of Personal Information



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1. The EFCC will make reasonable efforts to ensure that personal information is accurate, complete and up to date.
2. The EFCC will not routinely update information.
3. The EFCC will only update information when it is necessary to fulfill the purpose for which the information was collected or when an individual notifies us. A request to correct personal information can be made verbally and in writing and must provide sufficient detail to identify the constituent and the correction being sought. These requests can be directed to the Privacy Officer or the designated individual (EFCC/M Personnel).

F. Safeguarding Personal Information

1. The EFCC is committed to ensuring the security of constituent personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, loss, theft, modification or disposal.
2. The following security measures will be followed to ensure that constituent personal information is appropriately protected:
 - a. Physical – locking filing cabinets; locking offices where personal information is kept
 - b. Electronic - the use of IDs, passwords, encryption, firewalls
 - c. Organizational - restricting employee access to personal information as appropriate (i.e., only those who need to know will have access); contractually requiring any service providers to have comparable security measures in place (ie lawyers, credit card agencies, etc.)
3. The EFCC will use appropriate security measures when disposing of personal information, such as shredding of documents and deletion of electronically stored information, in order to prevent unauthorized parties from gaining access.
4. The EFCC will review our privacy and security policies and controls with employees and volunteers to ensure ongoing personal information confidentiality and security.

G. Individual Access to Personal Information

1. Constituents have a reasonable right to access their personal information and the reason for its use, subject to exceptions including, but not limited to:



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- Situations of solicitor-client privilege
 - Situations where disclosure may reveal personal information of another individual
 - Situations where the health or safety of an individual may be jeopardized
 - Situations where the information was provided confidentially (such as references)
2. If sensitive medical information is requested by an employee or volunteer, the Privacy Officer may choose to make this available through a medical practitioner.
 3. A request to access personal information must be made in writing and must provide sufficient detail to identify the personal information being sought. Any request should be forwarded to the Privacy Officer or designated individual.
 4. If the Privacy Officer believes, for valid reasons, that access to personal information should be denied, he/she shall consult with legal counsel before informing on such a decision.
 5. If the organization has supplied personal information about an individual to third parties, the Policy Officer will ensure that an attempt is made to determine as specifically as possible which third parties were supplied with the info. When the EFCC is unable to give an exact list of the organizations to which it has disclosed information, we will provide a list of organizations to which it might have disclosed information about the individual.
 6. The EFCC will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
 7. A minimal fee may be charged for providing access to personal information. In which case, the EFCC will inform the constituent of the cost and determine whether or not he/she wishes to proceed with the request.
 8. If a request for information is refused in full or in part, the EFCC will notify the constituent in writing, providing the reasons for refusal and the recourse available to him/her.

H. Privacy Related Questions and Complaints

1. It is The EFCC's policy that all privacy related complaints shall be investigated. Constituents should direct any complaints, concerns or questions regarding the Privacy Policy or the use of personal information to the Privacy Officer. It must be submitted in writing.



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2. The EFCC procedure for dealing with Privacy complaints is as follows:

- Record the date and nature of a complaint when it is received
- Acknowledge receipt of the complaint promptly
- Provide to the individual, where possible, access to all relevant records and review the matter with him/her fairly and impartially
- Discuss the matter with appropriate leadership, if necessary and make conclusions appropriately
- Notify the individual of the outcome of the review promptly and clearly
- If the complaint is found to be justified, the EFCC will take appropriate measures including, if necessary, amending policies and practices. The EFCC will also, if necessary and as required, correct any inaccurate or incomplete information when possible

3. If the Privacy Officer is unable to resolve the concern, the constituent may also write to the Federal Privacy Commissioner.

Contact information (For 2019 and until further notice)

Privacy Officer: **Kirby Thompson**, Executive Assistant to the EFCC Executive Director

Address: Box 850 Langley Stn LCD 1
Langley, BC V3A 8S6

Telephone: 604-513-2183

Toll-free: 1-877-305-EFCC (3322)

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