

# North York (Chinese) Baptist Church

## Privacy Policy – July 2019

### 1. Background

North York (Chinese) Baptist Church (“NYCBC” or the “Church”) is committed to its responsibilities in protecting the privacy, confidentiality and security of personal identifiable information (“PII”) of its members and applicable affiliated persons. The Church is committed to ensuring that any PII of its members and/or applicable affiliated persons is collected, used, retained and disclosed in compliance with any applicable Canadian federal and Ontario provincial privacy legislations along with any requirements stated within the Church’s by-laws and/or rules.

The Church developed a Privacy Policy in 2014, which was ratified by the Church membership in April 2014. This Privacy Policy (“Policy”) has been revised to be in compliant with Canada’s Personal Information and Electronic Documents Act (PIPEDA). This Policy outlines the principles and practices the Church follows in protecting personal information.

### 2. Scope and Applicability

This Policy applies to all individuals of the Church including all staff, church leaders (e.g. deacons, elders, etc.), volunteers, church members and congregants who are involved in any activities and/or processes that collect, use, retain or disclose personal information.

This Policy is applicable to information collected, used, retained and disclosed in any medium and any form, which can include, but not limited to written information, electronic information, images, other media files, etc. A copy of this Policy is to be provided to anyone upon request.

### 3. Definition of Personal Identifiable Information

For the purpose of this Policy, personal identifiable information (“PII” or “personal information”) refers to any information (factual or subjective) that could be used to identify an individual. factual or subjective information about an identifiable individual. This includes, but is not limited to the following pieces of information:

- contact information (e.g. name, mailing address, e-mail address, telephone, etc.)
- membership information (e.g. *membership status, baptism information, date of birth, etc.*)
- household information (e.g. family relationships, number of children, etc.)
- financial information (e.g. offering number, Banking information, etc.)

From time to time, specific information may be requested from ministry workers, participants of ministry programs and participants of special Church events on an as needed basis. These elements are also considered a type of personal identifiable information and is covered under the principles and requirements outlined in the Policy. If any time there is uncertainty if a particular information element is considered personal information, contact the Privacy Officer or designate.

## **4. Privacy Principles**

To safeguard the personal information entrusted to NYCBC and to comply with the PIPEDA and any other applicable legislation, NYCBC is committed to adopting the ten principles outline as the basis of its Privacy Policy and Program.

### **4.1 Accountability**

*Appoint the Church Administrator as the Personnel Information Compliance Officer to be responsible for NYCBC's compliance; protect all personal information held and develop and implement personal information policies and practices,*

The Church will ensure accountability for privacy by:

- Appointing the Church Administrator or a designate as the Privacy Officer, who is responsible for NYCBC's compliance to the Privacy Policy and the protection of all personal information collected, used, retained and disclosed
- Developing and implementing privacy policies and practices, where applicable
- Ensuring that all individuals who collect, use, retain and/or disclose personal information is accountable for such information to the Privacy Officer and/or designate

### **4.2 Identifying Purposes**

*NYCBC must identify the reasons for collecting personal information before or at the time of collection.*

The Church is committed to fulfilling this principle by:

- Identifying and documenting the reasons for collecting personal information before or at the time of collection to the individual providing the information
- Explicitly making available and/or clearly explain the purposes for which the personal information is being collected

### **4.3 Consent**

*Obtain the individual's consent before or at the time of collection of personal data, as well as when a new use is identified.*

The Church is committed to fulfilling this principle by:

- Obtaining the individual's consent before or at the time of collection of personal information, as well as when a new use is identified unless specified by law
- Obtaining expressed consent wherever possible and appropriate and in cases where implied consent cannot be assumed
- Ensuring that the consent collected is explicit and in a verifiable form
- Enabling the individual to withdraw consent at any time, subject to written request and reasonable notice, and notifying him/her about the implications of withdrawing consent

#### **4.4 Limiting Collection**

*Do not collect personal information indiscriminately; do not deceive or mislead individuals about the reasons for collecting personal information.*

The Church is committed to fulfilling this principle by:

- Not collecting personal information indiscriminately. The amount and type of the information collected should be limited to what is necessary for the identified purposes, unless required by law
- Ensuring that information must be collected by fair and lawful means (e.g. do not deceive or mislead about the reasons for collecting personal information.)

#### **4.5 Limiting Use, Disclosure, and Retention**

*Use or disclose personal information only for the purpose for which it was collected and put guidelines and procedures in place for retaining and destroying personal information.*

The Church is committed to fulfilling this principle by:

- Using, disclose or retaining personal information only for the purpose for which it was collected, unless required by law and/or except with the individual's consent
- Limiting the amount and type of personal information that is shared with third parties. If information is to be shared, contractual or other documented agreement must be in place to ensure that personal information shared is documented (i.e. all sharing to third parties must be known by the Church) and is adequately protected
- Prohibiting the selling or renting of personal information that is collected to third parties
- Ensuring that personal information is destroyed, erased or made anonymous as soon as the purpose for which it is collected is no longer required, unless required by law

#### **4.6 Accuracy**

*Minimize the possibility of incorrect information.*

The Church is committed to fulfilling this principle by:

- Making every effort to ensure that the information collected is accurate, complete and up-to-date for the purpose for which the information is to be used

- Updating personal information only as and when necessary to fulfill the identified purposes or upon notification by the individual

#### **4.7 Safeguards**

*Protect personal information against loss, theft or unauthorized access.*

The Church is committed to fulfilling this principle by:

- Protecting personal information against loss, theft or unauthorized access
- Storing information in confidential databases and at the management office of the Church and at the storage location of its staff/custodians
- Ensuring that its office staff and division/ministry workers keep all personal information confidential and comply with the security standards established by the Church
- Requiring the people accessing information to commit to an appropriate level of security through execution of a confidentiality agreement in protection of such information to satisfy the standards established by the Church
- Adopting physical and technological measures such as locked filing cabinets, restricted access to databases, use of passwords, where feasible and applicable
- Disposing of personal information in a manner that will prevent unauthorized parties from gaining access to it (e.g. paper shredding, etc.)

#### **4.8 Openness**

*Make known that NYCBC has policies and practices for personal information.*

The Church is committed to fulfilling this principle by:

- Making known that NYCBC has policies and practices regarding the privacy and protection of personal information collected
- Disclosing the contact information of the Privacy Officer who is accountable for the Church's Privacy Policy and practices and to whom complaints and/or inquiries can be made to
- Ensuring that documentation related to the Church's Privacy Policy is readily accessible and available upon request through the Privacy Officer or the Church Office

#### **4.9 Individual Access**

*When requested, inform individuals if you have any personal information about them.*

The Church is committed to fulfilling this principle by:

- Allowing individuals to access, verify and correct or amend their own personal information collected by the Church
- Encouraging individuals to help the Church keep their personal information that has been collected as current as possible

- Providing individuals access rights to their personal information, where feasible. They will be able to address the accuracy and completeness of their personal information and have it amended, if inaccurate or incomplete.
- Enabling individuals to request a record of the personal information that has been collected through written request to the Privacy Officer
- Responding to any inquiries about access to information in a reasonable manner

#### 4.10 Provide Recourse

*Develop simple and easily accessible complaint procedures; inform complainants of avenues or recourse.*

The Church is committed to fulfilling this principle by:

- Developing a simple and easily accessible complaint procedures to adequately receive and respond to complaints or inquiries
- Informing complainants of avenues of recourse for their concerns
- Enabling and designating the Privacy Officer as the primary point of contact to address any concerns or complaints with the above principles
- Taking appropriate measures, where feasible and necessary to address any concern or complaint that is found to be justified

## 5 Document Owner

This document is owned by NYCBC’s Privacy Officer and/or designate. The document is to be reviewed every two years to ensure that it remains up-to-date with any relevant and applicable federal and provincial regulations. Any changes to this document must be reviewed and approved by the Board of Deacons (“BOD”) and ratified by the Church membership in accordance with the Church’s by-laws. If there are no material changes to the document, every two years, the Policy can be approved by the Board of Deacons.

## 6 Version Control

Version	Updates	Drafted By:	Approved By:	Ratified By:
2.0	Major Revisions	Privacy Policy Drafting Committee July 2019	Infrastructure Committee Dec 2019	NYCBC BOD Dec 2019
1.0	Initial Document	Privacy Officer 2014	NYCBC BOD April 2014	Church Members April 2014

# 北約華人浸信會

私隱條例 - 2019年7月

## 1. 背景

北約華人浸信會 (北約浸信會或教會) 承諾對會友及 / 或相關附屬人士，可認證之個人身份資料之私隱，保密及安全予以保護。教會承諾對會友及 / 或相關附屬人士，可認證之個人身份資料之收集，使用，保存及披露，遵循適用之加拿大聯邦及安省私隱立法，以及教會會章及 / 或規條之要求。

教會於2014年設定私隱條例，並於2014年4月為會友通過接納。此私隱條例曾依循加拿大個人資料及電子文件法案作出修訂。條例簡列教會保護個人資料之政策及措施。

## 2. 範疇與適用性

此條例適用於所有參與收集、使用、保存及披露個人資料任何活動及進程之教會成員，包括員工，領袖(如執事，長老等)，義工，會友及會眾。

此條例適用於以任何方式於任何媒體收集、使用、保存及披露資料，包括但不限於書面資料、電子資料、圖象、其他媒體檔案等。經要求之人士，可取得此條例之複印本。

## 3. 認證身份之個人資料，其定義為：

為著此條例之目的，任何有關認證身份之個人資料(個人資料)，(實質性或主觀性)，可用於界定個人身份之實質性或主觀性資料。包括但不限於以下資料：

- 聯絡資料(如姓名，郵寄地址，電郵地址，電話等)
- 會籍資料(如會籍狀況，受浸資料，出生日期等)
- 家庭資料(如家庭關係，子女數目等)
- 財務資料(奉獻號碼，銀行資料等)

遇需要時，員工，事工活動及教會特別事項參與者，可能需要特定資料。此種資料亦認定為一種認證身份之個人資料。在任何時間，未能確定相關資料是否屬於個人資料包括在私隱條例之原則及要求以內，請與私隱同工或其指定代表聯絡。

## 4. 私隱原則

為保障所交託北約浸信會之個人資料，並遵循政府〈保護個人資料及電子文件法案〉或其他適用之立法，教會承諾履行十項原則作為私隱條例及進程之基礎。

### 4.1 承擔

委派教會行政主任為個人資料之執行同工，負責保護北約浸信會所有個人資料之保存，發展並貫徹個人資料之政策及措施

為確保私隱之承擔，教會將：

- 委任教會行政主任或其指定代表為私隱同工，負責北約浸信會依據私隱條例保護所有個人資料之收集、使用、保存及披露。
- 當適用時，發展並完成私隱政策及措施。
- 確保所有參與收集、使用、保存及 / 或披露個人資料之人員，為資料向私隱同工及 / 或其指定代表承擔責任。

### 4.2 界定目的

在收集資料之先或收集期間，北約浸信會必須界定收集個人資料之理由。

為貫徹此項原則，教會承諾：

- 在收集資料之先或收集期間，向提供資料者界定及以文件說明收集個人資料之理由。
- 公告及 / 或清楚解釋個人資料收集之目的。

### 4.3 同意

在收集資料之先或收集期間，並在另作用途時，取得相關人士之同意。

為貫徹此項原則，教會承諾：

- 除法律特別規定外，在收集資料之先或收集期間，並在另作用途時，取得相關人士之同意。
- 在可能及適當範圍內，或預設之同意未能實現時，取得相關人士表達同意。
- 確保取得之同意以明確及可認證之方式顯示。

- 容許相關人士於任何時間，經書面要求及合理通知後，撤消同意。並告知將採納其撤消。

#### **4.4 資料收集之規限**

不會隨便地收集個人資料，對收集個人資料之理由不作欺瞞或誤導。

為貫徹此項原則，教會承諾：

- 不會隨便地收集個人資料。除法律要求外，收集個人資料之數量及方式，當限於為指定目的所必需。
- 確保資料收集之公正及合法(如對收集資料之理由不欺瞞或誤導)。

#### **4.5 只為收集資料之目的而使用或披露個人資料**

只為收集資料之目的而使用或披露個人資料，並為保存及銷毀個人資料，設定指引及程序。

為貫徹此項原則，教會承諾：

- 除法律要求及 / 或相關人士同意下，只在為指定目的而使用，披露或保留個人資料。
- 規限與第三者共用資料之數量及資料之類別。若資料共用，需備有立約或其他歸檔之同意書，以保證共用之資料經已入檔 (如:所有與第三者之共用，教會必須知悉) 並獲適當之保護。
- 禁止向第三者售賣或租出所收集之個人資料。
- 除法律要求外，當收集之目的不再需要時，須確保儘快將個人資料銷毀，刪除或不再具名。

#### **4.6 準確性**

減低不正確資料之可能性。

為貫徹此項原則，教會承諾：

- 為資料使用之目的，儘力確保資料收集之準確，完全與及時。
- 只在為實現指定目的及在相關人士示意下，適時修訂個人資料。

#### **4.7 保障**

保護個人資料，防止失落，盜竊或未經許可而獲取資料。

為貫徹此項原則，教會承諾：

- 保護個人資料，防止失落，盜竊或未經許可而獲取。
- 在保密電腦資料庫，在教會行政辦公室，以及在職工 / 保管人存庫內，貯存資料。

- 確保辦公室，部門同工及事工人員，遵循教會設定之安全標準，為個人資料保密。
- 要求使用資料人員，承諾以適當安全水準履行保密共識，滿足教會設定之安全標準，保護資料。
- 在靈活及可行範圍內，採用人手，科技方法，如文件櫃加鎖，規限電腦檔案之使用，加上密碼等。
- 刪除個人資料，防止未經許可者取得資料 (如使用切紙機等)。

#### **4.8 開放性**

公告北約浸信會具備有關個人資料之政策及措施。

為貫徹此項原則，教會承諾：

- 公告北約浸信會具備有關私隱及保護所收集個人資料之政策及措施。
- 讓人知悉如何與負責教會私隱條例及措施之私隱同工聯絡之關資料，以便投訴及 / 或諮詢。
- 教會確保私隱條例文件可以取得，經要求可向私隱同工或辦公室索取。

#### **4.9 個人知情權**

經要求，告知相關人士教會是否保有其個人資料。

為貫徹此項原則，教會承諾：

- 容許相關人士對教會所收集其個人資料作出查詢，澄清，修正或補充。
- 鼓勵相關人士對教會所收集其個人資料儘可能作出及時之修正。
- 在可行時，為相關人士對其個人資料提供知情權，對資料之準確及完備提出意見。若有不準確或未完備之處，作出修正。
- 經向私隱同工書面要求，相關人士可獲取經修正之個人資料記錄。
- 以合理態度回應相關人士對知情權之諮詢。

#### **4.10 提供協助**

設定簡單易行之知情權投訴程序，告知投訴途徑或可予以否定。

為貫徹此項原則，教會承諾：

- 設定簡單易行之知情權投訴程序，適當地接收並回應投訴或諮詢。
- 將投訴者關切之求助途徑告知投訴者。
- 為處理有關上述原則之任何關注或投訴，授權並指定私隱同工為主要之接觸點。
- 當可行及必要時，採取適當措施，以處理任何合理之關注或投訴。

## 5 文件持有者

本文件由北約浸信會私隱條例同工或其指定代表所持有。確保及時地遵循有關與適用之聯邦及安省法例。文件之任何改變，必須由執事會審核及認許，並經教會會友根據教會會章通過接納。若無實質改變，每兩年再經由執事會認許。

## 6 版本

版本	修訂	起草者	認許者	批准者
第二版	主要修訂	私隱條例起草委員會 2019年7月	基礎設施委員會 2019年12月	北約浸信會執事會 2019年12月
原版	原有文件	私隱條例同工 2014	北約浸信會執事會 2014年4月	教會會友 2014年4月

\*此報告以英文原稿為準。