

# ADMINISTRATION POLICY

# **Privacy Policy**

**Approval Date:** February 2025 **Approved By: Executive Pastor** 

Name/Signature: Christopher Joseph

Supercedes: 2020

Next Review Date: January 2027

#### Scope:

Applies to all Metropolitan Bible Church employees, contractors, volunteers, church attendees, and visitors. This policy applies to the collection, use and disclosure of personal information gathered for all ministries and functions sanctioned by The Met. "Personal information" means information about an identifiable individual, such as an individual's name, address, telephone number, email address, marital status, social insurance number, images, health and driver's licence. This Policy does not apply to business contact information, which is not "personal information" under privacy laws.

#### **Purpose:**

This policy is to safeguard personal information entrusted to The Metropolitan Bible Church Ministry Corporation ("The Met") and to comply with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and any other applicable legislation.

# **Policy Statement:**

The Met is committed to maintaining the accuracy, confidentiality and security of all personnel information in its possession. As part of this commitment The Met has adopted ten privacy principles that form part of this policy. The principle statements are listed in ANNEX A. A copy of this policy is available to anyone upon request and on our website at metbiblechurch.ca.

#### Responsibilities:

The Met has appointed a Privacy Officer who is responsible for ensuring The Met's compliance with this policy. The Privacy Officer reports directly to the Chairman of the church board on privacy issues. The Office Coordinator is responsible for all but Donor information. The Treasurer is responsible for this data.

The development and application of procedures supporting this privacy policy are the responsibility of the Privacy Officer(s).

The Executive Pastor will review this policy annually at minimum and make any legal updates as required.

#### **Procedures:**

#### 1. Collection of personal information

The Met will only collect personal information that we require for the purposes of:

- providing services and issuing receipts for donations
- purposes incidental to the provision of services at The Met
- as required or authorized by law or legal requirements.

If you are serving in certain ministries (ex. children, youth or vulnerable adult ministries) we also ask for and collect information about your past, including behavior and police checks to review suitability for certain types of ministry work. To obtain information for children under the age of 18, The Met will request information from the child's parent(s) or guardian(s).

All ministry leaders and others assigned to collect personal information are to be advised of and agree with this privacy policy.

#### 2. Protection and Accuracy of Personal Information

Ministry leaders who collect data are responsible for its accuracy, distribution and security. Where an individual requests their name not be circulated beyond the intent of the original purpose of collecting the information, ministry leaders will comply with the request. The Ministry leader is responsible for maintenance, preventing loss, unauthorized access, and inappropriate distribution.

The Met stores personal information of its congregants within our Planning Centre Online (PCO) database; PCO's Privacy Policy is available at planning.centre/privacy.

#### 3. Use and Disclosure of Personal Information

The Met will adhere to its principle of limiting its use of personal information for the purpose for which it was collected and will not provide any information to unrelated Organizations, ministries external to The Met, or other third parties, without the consent of the individual or guardian, unless required by law (see Annex A).

# 4. Donor Privacy

Donor information is retained for income tax receipting purposes. All donor information will be considered private and confidential and will be held in strict confidence. This information will not be disclosed to outside parties unless required by law.

The name and address of specific individual group donors may also be forwarded from time to time with specific donations as a courtesy to missionaries, unless the donor requests that their donation be provided anonymously to the missionary.

The Met will guard the privacy of its donors in all solicitations and appeals and will not reveal such information to any person, or note in any publication, unless specific permission has been obtained.

#### 5. Access to records containing personal information

An individual has the right to access their personal information maintained at The Met unless doing so would conflict with the law or violate the privacy of another individual under this Policy.

Donors may ask the Donation or Envelope Secretary, either verbally or in writing, questions regarding their donations to The Met.

Upon request in writing to the Privacy Officer, individuals will be able to obtain information on their own personal information held by The Met.

Video surveillance is conducted for security purposes – public safety and deterring theft, and break and enter. Information collected through video surveillance will only be used for the purpose that surveillance is being undertaken. Recordings will be stored securely in an access-controlled area and server. With the exception of requests by law enforcement agencies, individuals must submit a formal request to view recordings that will be subject to approval by the Privacy Officer.

In some circumstances, The Met may not be able to provide access to personal information, if doing so would reveal personal information about a third party. If access is not provided, a written response indicating the reasons for refusal will be provided to the individual.

#### 6. Websites and Apps

When you visit our website or apps, we will not collect your personal information unless you choose to use or receive communications or services that require it.

#### 7. Enquiries and Complaints

Any questions or concerns about any collection, use or disclosure of personal information by The Met, or about a request for access to your own personal information may be addressed to the Privacy Officer by email (info@metbiblechurch.ca) or regular mail at 2176 Prince of Wales Drive, Ottawa ON K2EOA1.

# ANNEX A The Ten Principles of our Privacy Policy

The Metropolitan Bible Church (The Met) has adopted a detailed **Privacy Policy** to ensure that we safeguard and maintain the confidentiality of your personal information. This policy includes the following ten principles:

#### 1. Accountability

The Met is responsible for all personal information under its control, and all persons, employees or volunteers, who collect, process or use personal information, shall be accountable for compliance with these principles.

#### 2. Identifying Purposes

The Met will only collect and store personal information required to fulfill purposes for which it is collected, for its ministries and administrative functions.

#### 3. Consent

The Met requires an individual's knowledge and consent (express or implied) for the collection, use, or disclosure of personal information, except as required or permitted by law. A person giving consent has the right to withdraw consent.

#### 4. Limiting Collection

The Met will limit the amount and type of information collected to that which is necessary to fulfill the purposes identified: to have an accurate record of an individual's involvement in the ministry, to ensure appropriate allocation of giving, and to contact attendees as necessary for ministry and administration purposes.

#### 5. Limiting Use, Disclosure and Retention

The Met 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.

#### 6. Accuracy

The Met will keep personal information as accurate, complete, and up-to-date as is reasonable and necessary for its purposes.

#### 7. Safeguards

The Met will protect personal information against loss or theft as well as unauthorized access, with safeguards appropriate to the sensitivity of the information.

#### 8. Openness

The Met will make readily available to individuals specific information about its policies and practices relating to the management of personal information.

### 9. Individual Access

Upon request in writing, an individual will be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate or deleted on request.

### 10. Challenging Compliance

An officer of The Met will address and investigate a challenge concerning compliance with the above principles of this policy.