

Beacon Unitarian Church

Personal Information Protection Policy

(also known as Privacy Policy)

Approved by the Beacon Board June 15, 2023.

At Beacon Unitarian Church, we are committed to providing our members, adherents, and visitors with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, adherents and visitors, protecting their personal information is one of our highest priorities.

While we have always respected our members', adherents' and visitors' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our members, adherents and visitors of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting member's, adherent's, friend's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our member's, adherent's, friend's personal information and allowing our members, adherents and visitors to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual*. *E.g. name, address, phone number*
Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or

business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that Beacon Unitarian Church complies with this policy and PIPA. It has been determined that the Privacy Officer will be the Secretary of the Board.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the members, adherents and visitors voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect member, adherent, friend information that is necessary to fulfill the following purposes:
 - To enrol the member, adherent, friend in a program;
 - To provide our association membership information (our on-line church directory);
 - To contact our members, adherents, friends, including for fundraising;
 - To ensure a high standard of service to our members, adherents, friends;
 - To meet regulatory requirements;

Policy 2 – Consent

- 2.1 We will obtain member, adherent, friend consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, or electronically or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member, adherent, friend voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member, adherent, friend is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs or fundraising and the member, adherent, friend does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members, adherents and visitors can withhold or withdraw their consent for Beacon Unitarian Church to use their personal information in certain ways. A member's, adherent's, friend's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the member, adherent, friend in making the decision.
- 2.5 We may collect, use or disclose personal information without the member's, adherent's, friend's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - To protect ourselves from fraud;

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose member, adherent, friend personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
 - To conduct member, adherent, friend surveys in order to enhance the provision of our services;
- 3.2 We will not use or disclose member, adherent, friend personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell or give member, adherent, friend lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use member, adherent, friend personal information to make a decision that directly affects the member, adherent, friend, we will retain that personal information for at least one year so that the member, adherent, friend has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain member, adherent, friend personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that member, adherent, friend personal information is accurate and complete where it may be used to make a decision about the member, adherent, friend or disclosed to another organization.
- 5.2 Members, Adherents, Friends may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the member's, adherent's, friend's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of member, adherent, friend personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that member, adherent, friend personal information is appropriately protected:

the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures].
- 6.3 We will use appropriate security measures when destroying member's, adherent's, friend's personal information such as deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing members, adherents and visitors Access to Personal Information

- 7.1 Members, adherents and visitors have a right to access their personal information, subject to limited exceptions.

A full listing of the exceptions to access can be found in section 23 of PIPA.

- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell members, adherents and visitors how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We 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.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member, adherent, friend of the cost and request further direction from the member, adherent, friend on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the member, adherent, friend in writing, providing the reasons for refusal and the recourse available to the member, adherent, friend.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer or designated individual is responsible for ensuring Beacon Unitarian Church's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Members, adherents and visitors should direct any complaints, concerns or questions regarding Beacon Unitarian Church's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member, adherent, friend may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Beacon Unitarian Church's Privacy Officer:

secretary@beaconunitarian.org