

The Pentecostal Assemblies of Canada

Privacy Policy

THE PENTECOSTAL ASSEMBLIES OF CANADA (PAOC) is committed to respecting the privacy of its employees, credential holders, candidates, donors and contacts. In demonstration of our commitment to this privacy and in voluntary compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA) we have created the following Privacy Policy (the "Policy"). The Policy has been designed to reflect our commitment to the principles outlined in PIPEDA.

All officers, directors, employees and volunteers of The Pentecostal Assemblies of Canada are required to comply with the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

All other persons or organizations who act for, or on behalf of, The Pentecostal Assemblies of Canada are also required to comply with the principles and the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

- **Accountability**
- **Identifying Purposes**
- **Consent**
- **Limiting Collection**
- **Limiting Use, Disclosure and Retention**
- **Accuracy**
- **Safeguards**
- **Openness**
- **Individual Access**
- **Challenging Compliance**
- **Privacy Director**

Principle 1 - Accountability

- 1.1 THE PENTECOSTAL ASSEMBLIES OF CANADA is responsible for personal information which we collect, use or distribute and any personal information in our custody or under our control.
- 1.2 THE PENTECOSTAL ASSEMBLIES OF CANADA has appointed Judy Hearn as the Privacy Director who will be responsible for overseeing the Policy as well as any inquiries, requests or concerns relating to privacy matters. The Privacy Director may, from time to time, designate one or more individuals within The Pentecostal Assemblies of Canada to act on her behalf.
- 1.3 We will continually create and update procedures in accordance with this Privacy Policy to govern the handling of personal information and respond to complaints.

Principle 2 - Identifying Purposes

- 2.1 THE PENTECOSTAL ASSEMBLIES OF CANADA is committed to ensuring that the purposes for which personal information is collected, used, or disclosed are identified and are reasonable and appropriate in the circumstance.

2.2 THE PENTECOSTAL ASSEMBLIES OF CANADA will only collect personal information from employees, credential holders, candidates, donors and contacts that 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 services
- To inform regarding denominational priorities, policies and practices
- To make contact for fundraising
- To meet government requirements
- To facilitate historical research

Principle 3 - Consent

3.1 THE PENTECOSTAL ASSEMBLIES OF CANADA will obtain reasonably informed consent of employees, credential holders, candidates, donors and contacts to collect, use or disclose personal information except where we are authorized to do so without consent.

3.2 Consent can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the employees, credential holders, candidates, donors and contacts voluntarily provides personal information for that purpose.

3.3 In general, the use of products and services by an employee, credential holder, candidate, donor or contact, or the acceptance of employment or benefits by an employee, constitutes implied consent for THE PENTECOSTAL ASSEMBLIES OF CANADA to collect, use and disclose personal information for all identified purposes. Consent may also be implied where employees, credential holders, candidates, donors and contacts are given notice and a reasonable opportunity to opt-out of his or her personal information being used for certain purposes and the employee, credential holder, candidate, donor or contact does not opt-out. Individuals may withdraw their consent at any time subject to legal or contractual notice, by providing reasonable notice to PAOC of their intent to withdraw their consent.

3.4 The following are examples of when we may collect, use or disclose the personal information of an employee, credential holder, candidate, donor or contact without their consent:

- When the collection, use or disclosure of personal information is permitted or required by law;
- When collection is clearly in your best interests and we are unable to obtain your consent in a timely way;
- In an emergency that threatens an individual's life, health or personal security;
- When disclosure is required for statistical, archival collection and research purposes;
- When the personal information is available from a public source (eg. a telephone directory);
- When the personal information is available through observation at a public

- event to which you attended voluntarily;
- When the collection, use or distribution is necessary to determine your suitability to receive an honour, award or similar benefit or to be selected for a religious, athletic or artistic purpose;
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt or other obligation;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law;
- When the personal information is voluntarily disclosed by the person to whom it applies by using equipment or data owned by the PAOC (eg. through the use of company computers, email addresses etc.).

Principle 4 - Limiting Collection

- 4.1 THE PENTECOSTAL ASSEMBLIES OF CANADA will limit the collection of personal information to that which is necessary for identified purposes. The PAOC will only collect personal information by fair and lawful means and for purposes that a reasonable person would consider appropriate in the circumstances.

Principle 5 - Limiting Use, Disclosure and Retention

- 5.1 THE PENTECOSTAL ASSEMBLIES OF CANADA will not use or disclose personal information for purposes other than for those for which it was collected except with the consent of the individual or as required or permitted by law.
- 5.2 THE PENTECOSTAL ASSEMBLIES OF CANADA will only retain personal information as long as it is needed for the purposes for which it was collected or consented to. THE PENTECOSTAL ASSEMBLIES OF CANADA will maintain reasonable schedules to ensure that personal information is reviewed on an ongoing basis to determine relevance and if retention is required.
- 5.3 When personal information collected is no longer relevant to its purpose or when it is permitted by law, THE PENTECOSTAL ASSEMBLIES OF CANADA will ensure that it is deleted, destroyed or made anonymous in a secure manner.

Principle 6 - Accuracy

- 6.1 THE PENTECOSTAL ASSEMBLIES OF CANADA will take reasonable efforts to ensure that personal information is accurate and complete.
- 6.2 THE PENTECOSTAL ASSEMBLIES OF CANADA will 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 in writing or by phone. Sufficient detail to identify the personal information and the correction being sought must be provided.

Principle 7 - Safeguards

- 7.1 THE PENTECOSTAL ASSEMBLIES OF CANADA shall stress to both employees and

volunteers the importance of safeguarding the confidential nature of personal information and will provide training in this regard.

- 7.2 THE PENTECOSTAL ASSEMBLIES OF CANADA will routinely review and update our security measures which will include: Physical measures such as locking filing cabinets and restricted access to offices as appropriate; Organizational measures, such as security clearances and policies governing access to information; Technological measures, such as the use of passwords and encryption.
- 7.3 THE PENTECOSTAL ASSEMBLIES OF CANADA shall protect personal information disclosed to third parties by contractual agreements and/or third party policies that stipulate the confidentiality and safeguard requirements that are comparable to our own.
- 7.4 THE PENTECOSTAL ASSEMBLIES OF CANADA shall from time to time use web applications where personal information is sent to another jurisdiction for processing, and where it may be accessed by the courts, law enforcement and national security authorities of that jurisdiction.

Principle 8 - Openness

- 8.1 THE PENTECOSTAL ASSEMBLIES OF CANADA is committed to making its privacy policies and procedures available and clear to all interested parties.
- 8.2 Any questions or concerns regarding our policy or procedure may be directed in writing to our Privacy Director.

Principle 9 - Individual Access

- 9.1 Employees, credential holders, candidates, donors and contacts have a right to access their personal information, subject to limited exceptions including, but not limited to:
 - Situations of solicitor-client privilege
 - Situations where disclosure may reveal the 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 the references for candidates
- 9.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the attention of the Privacy Director. A reasonable fee may be charged for providing access to personal information, in which case we will inform the employee, credential holder, candidate, donor or contact prior to proceeding.
- 9.3 In certain situations, it may not be possible to provide access to all the personal information that is held and a request may be refused in whole or in part, providing the reasons for refusal and the recourse available. For example, information may not be provided if to do so would reveal personal information about a third party or

jeopardize the security of another.

Principle 10 - Challenging Compliance

- 10.1 It is THE PENTECOSTAL ASSEMBLIES OF CANADA's policy that all privacy related complaints shall be investigated. Complaints made regarding the Privacy Policy or the use of personal information should be made to the Privacy Director in writing.
- 10.2 The procedure of THE PENTECOSTAL ASSEMBLIES OF CANADA for dealing with complaints is as follows:
- Record the date and nature of a complaint when it is received
 - Acknowledge receipt of the complaint promptly
 - Review the matter fairly and impartially, providing to the individual, where possible, access to all relevant records
 - Notify the individual of the outcome of the investigation promptly and clearly
 - If the complaint is found to be justified, we will take appropriate measures, including, if necessary, amending our policies and practices. We will also, if and as required, correct any inaccurate or incomplete information when possible.
- 10.3 If the Privacy Director is unable to resolve the concern, the employee, credential holder, candidate, donor or contact may also write to the Executive Officer Committee of the PAOC. If they are still unable to resolve the concern, they may also write to the Federal Privacy Commissioner.
- 10.4 The contact information for the Privacy Director is as follows:

Privacy Director – Mrs. Judy Hearn
The Pentecostal Assemblies of Canada
2450 Milltower Court, Mississauga ON L5N 5Z6
905-542-7400 Ext. 3011