

## **Personal Information Protection Policy**

### **PURPOSE**

To safeguard personal information entrusted to Gateway Church and to comply with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and any other applicable legislation.

Confidentiality is one of the ways we walk in the fear of the Lord, honour God and love people. God hates gossip (Proverbs 6:16-19) and gossip betrays a confidence (Proverbs 11:13).

### **PRIVACY PRINCIPLES**

Gateway Church is committed to maintaining the accuracy, confidentiality and security of all personal information in its possession. The Church, its elders, directors, officers, employees and volunteers are required to comply with this policy. As part of this commitment, Gateway Church has adopted the following ten principles, based on the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act.

1. Accountability

Gateway Church has appointed a Privacy Officer who is responsible for the organization's compliance with this policy. Each elder, director, committee, ministry, employee and volunteer is responsible for maintaining and protecting the personal information under its control, and is accountable for such information, to the Privacy Officer.

2. Identifying purposes

Gateway Church collects and uses personal information about individuals solely for the following purposes: i. To enable communication; ii. To provide income tax receipts; and, iii. To meet statutory and regulatory requirements.

Business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

The only circumstances under which personal information may be disclosed to third parties is for the fulfillment of any of the purposes identified above, or as required by law. Where personal information is disclosed to third parties, the church will make all reasonable efforts to ensure that the third party has appropriate security procedures in place for the protection of the personal information being transferred.

### 3. Consent

Unless we hear otherwise, provision of personal information on official church forms constitutes consent for the Church to collect, use and disclose personal information for the purposes stated in this policy.

An individual may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The choice to provide us with personal information is always the individual's. Decisions to withhold particular information may impact one's ability to receive the provision of certain services.

An individual may refuse or withdraw consent by contacting the Privacy Officer at [privacy@gatewaywinnipeg.com](mailto:privacy@gatewaywinnipeg.com) or 204-989-6580. The Privacy Officer will explain the options and any consequences of refusing or withdrawing consent, and will record the individual's choice.

### 4. Limiting collection

The personal information the Church collects shall be limited only to that which is necessary for the purposes identified.

### 5. Limiting use, disclosure and retention

The personal information the Church collects will only be used or disclosed for the purposes for which it was collected, unless an individual has consented to additional uses, or when it is required or permitted by law. Personal information will be retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

### 6. Accuracy

Gateway Church will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. If an individual finds any inaccuracies in our information, they should inform us and we will make the appropriate corrections promptly. In some cases, the Church relies on the individual to ensure that certain information, such as mailing address, email address and telephone number, is accurate and current.

### 7. Safeguards

Gateway Church uses appropriate security safeguards to protect personal information from risks such as loss, misuse, unauthorized access, disclosure, or alteration. Safeguards include physical, administrative, and electronic security measures.

All employees and volunteers of the Church are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behaviour, and must follow applicable laws and regulations. In the course of daily operations, access to personal information is restricted to those employees and volunteers whose job responsibilities require them to access it.

8. Openness

Gateway Church will provide information to individuals about our policies and procedures relating to the overall management of personal information that is under our control, or with regard to specific personal information about which an individual may have a concern. Contacting the Privacy Officer at [privacy@gatewaywinnipeg.com](mailto:privacy@gatewaywinnipeg.com) or 204-989-6580 can access this information.

9. Access

An individual has the right to access their own personal information which is held by the Church. Upon request in writing to the Privacy Officer at the address listed below, the individual will be informed of the existence, use, and disclosure of their personal information and will be given access to the information. In certain exceptional situations, the Church may not be able to provide access to certain personal information regarding an individual. For example, the Church may not provide access to personal information if doing so would reveal personal information about a third party. If access cannot be provided, Gateway Church will notify the individual in writing of the reasons for refusal.

10. Handling enquiries and complaints

Any questions or enquiries concerning compliance with our privacy policies and procedures may be addressed to the Privacy Officer by telephone at 204-989-6580, by email at [privacy@gatewaywinnipeg.com](mailto:privacy@gatewaywinnipeg.com), or by mail at 5-763 Kapelus Drive, West St. Paul, MB, R4A 5A4.

11. Revisions to this policy

The development of Gateway Church's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements, the Church may revise this policy from time to time. For a copy of the current version, please contact: [privacy@gatewaywinnipeg.com](mailto:privacy@gatewaywinnipeg.com) or 204-989-6580.