

## Privacy and Personal Information

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*Note: This Personal Information Policy covers General Council and regional council offices. It does not apply to communities of faith, which can be guided by this policy and any applicable provincial or territorial legislation.*

### **Commitment to Privacy**

For The United Church of Canada, respecting privacy rights and personal information has always been an important part of our commitment to our members, volunteers, employees and partners.

The United Church of Canada is committed to protecting the privacy, confidentiality, accuracy, and security of personal information that is collected, used, retained, and disclosed in compliance with applicable federal, provincial and territorial privacy legislation. This includes, but is not limited to, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) (2000, c.5). For more detailed information, please refer to the [PIPEDA in Brief page](#) on the Office of the Privacy Commissioner of Canada website.

Privacy legislation, including the federal PIPEDA legislation and provincial and territorial legislation, establishes rules for the collection, use and disclosure of “personal information.” It addresses two issues:

- the way an organization collects, uses, discloses, and protects personal information; and
- the right of individuals to access personal information about themselves.

### **The 10 Principles**

The United Church of Canada is committed to following the 10 principles for handling personal information as set out in Schedule 1 of PIPEDA. These principles are:

- Accountability
- Consent
- Limiting use, disclosure, and retention
- Safeguards
- Individual access provision of recourse
- Identifying purposes
- Limiting collection
- Accuracy
- Openness
- Challenging compliance

### **Personal Information**

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual—that is, it is information which can, directly or indirectly, identify an individual. Personal information does not include the name, title, business address, or business telephone number of an employee of an organization.

Personal information includes information in any form (i.e. printed/electronic) including home address, home phone number, age, personal e-mail address, race, national or ethnic origin, colour, religion, sexual orientation, marital status, mental or physical disability, family members' names, employee files, identification numbers, evaluations, disciplinary actions, the existence of a dispute and related opinions, comments, social status, income, credit and bank records, donation information, loan records, or medical records.

All personal information obtained, compiled, maintained, and disclosed for The United Church of Canada by third-party agents and contractors must comply with standards comparable to The United Church of Canada Privacy Information Policy and applicable federal/provincial/territorial privacy legislation. Contractual provisions requiring such compliance must be incorporated into all third-party agent and contractor agreements.

### **Collection of Information**

The United Church of Canada collects personal information for the following intended purposes:

- ministry personnel /lay employee records
- pension and benefits records
- information required for church records
- stewardship development and donor information
- elected member information
- legal/regulatory requirements
- financial and asset information

Personal information can only be used for the purposes for which it is collected. Specific permission must be sought if personal information is to be used for any other purpose than that for which it was initially collected.

### **Accountability**

The United Church of Canada is responsible for all personal information in its possession or custody, which means information, whether factual or subjective in nature, about an identifiable individual. This includes personal information that has been transferred to, or received from, a third party in the course of commercial activities for processing or other purposes for which consent has been given.

Personal information collected by The United Church of Canada includes, but is not limited to, health and financial information, such as:

- Name and age
- Address, telephone number, and e-mail address
- Medical records
- Identification numbers (such as Social Insurance Numbers)
- Income, assets, and transaction information
- Opinions, evaluations, and comments related to health and financial information
- Credit records and loan records
- Bank account or credit card information

### **Safeguards**

The United Church has a records and archives management process for the collection, management, retention, and disposition of personal information. Categories of individuals for which personal information is being collected and maintained include ministry personnel, lay employees, elected and appointed members, volunteers, donors, and retail customers. Personal information is contained in paper and electronic records within the possession or under the control of The United Church of Canada. Each employee and pensioner of The United Church of Canada, whether full-time, part-time, contract, or retired, has confidential and secure personnel, pension, benefits, and payroll files.

All personal information is the property of The United Church of Canada and all individuals have controlled access to their personal information. Personal information is to be stored under lock and key or is digitally secured if in electronic format, and only certain authorized individuals have access to it.

### **Retention and Transfer of Information**

Personal information is retained only as long as it is required to meet any potential obligations or legal or government requirements. Once the personal information is no longer required, it will be destroyed in compliance with federal and/or provincial territorial retention rules. When this personal information is no longer required, methods to destroy it are carried out using the same care as is used for preserving this information in compliance with the church's records retention schedules. In some cases, records are of archival value and transferred to the archives where restrictions are in place consistent with privacy standards.

If personal information is transferred to a third party for processing (for example, when printing cheques, managing claims and client statements, or for data processing) the person or organization providing the services on behalf of the church are required to protect confidentiality of all information in a manner consistent with that used in The United Church of Canada, or as required by law.

### **Access to Personal Information**

Each person has the right to access their own personal information that is in the possession or control of The United Church of Canada.

In order to access this personal information, requests should be made in writing to The United Church of Canada, Privacy Officers, stating as specifically as possible which personal information is being requested.

The United Church of Canada has the right to refuse a request for access to personal information if:

- the information is protected by solicitor-client privilege
- granting access would reveal confidential financial information
- doing so could reasonably be expected to threaten the safety or security of another individual
- the information was collected for purposes related to the detection and prevention of fraud
- the information was generated in the course of a formal dispute resolution process, or
- the information would likely reveal personal information about another individual
- the information was collected in the course of a disciplinary process within The United Church of Canada that is ongoing as of the date of the request.

### **Contact Information**

For more information, please contact The United Church of Canada's Privacy Officers:

Nicole Treksler

Email: [privacy@united-church.ca](mailto:privacy@united-church.ca)

Website: [united-church.ca](http://united-church.ca)