

# COMPLIANCE PRACTICES

## POLICY TO PROTECT PERSONAL INFORMATION IN

### ZION EVANGELICAL LUTHERAN CHURCH; PEMBROKE, ONTARIO

The following practices are applicable to information gathering at the congregational, synodical, or national level to the Evangelical Lutheran Church in Canada. The Policy is applicable to the National Church and its five synods and the Eastern Synod Lutheran, and protects information used and retained by those expressions of the Church. Congregations and related agencies should either adopt the ELCIC or Eastern Synod making appropriate changes to the wording or creating a separate policy to protect personal information in their settings.

(From Compliance Practices : Policy to Protect Personal Information in the Eastern Synod, page 1 ).

Zion Evangelical Lutheran Church respects members' privacy. We protect members' personal information and adhere to all legislative requirements with respect to protecting privacy. We do not rent, sell, or trade our membership information. The information provided will be used for activities of the Church, according to the following principles and/or procedures:

#### 1. Accountability

Mr. J.P. Quintal has been appointed as the Personal Information Compliance Officer (the "officer") of Zion Lutheran Church

The officer may be contacted with any query or complaint related to the collection, use or retention of personal information. If a complaint is received, the officer will investigate the complaint and take corrective action if required. If the complainant is not satisfied with the action of the officer, he/she may appeal to the Church Council to review and determine the disposition of the complaint.

The officer will communicate and explain the policy to all employees and volunteers, who collect, retain or use personal information in the Eastern Synod. Information which explains Zion's protection of personal information policies and procedures has been prepared and is made public on Zion's website ([www.zionlutheran.ca](http://www.zionlutheran.ca)).

#### 2. Identifying purposes

Zion collects personal information for the following purpose:

- to create membership lists,
- to communicate with committee and board members and volunteers,
- to inform members about the life of the church,
- to maintain subscriptions to church publications,
- to register participants for church events, and
- to compile statistical and historical information about Zion

This list is not exhaustive and it may change or be added to occasionally.

Individuals will be informed at the time of collection why information is being collected and for what purposes it will be used.

### 3. Consent

An individual's consent will be sought for collection of personal information. Those collecting information will ensure that an individual can reasonably understand why and how the information will be used when consent is given.

Express consent will be obtained wherever possible. When an individual completes an application or registration form, consent to collect the information is assumed. Verbal consent will be recorded on electronic or hardcopy documents with the date and name of the person collecting the information. If consent is given in written or email form, a copy of the consent will be kept on file.

A large volume of personal information was collected prior to January 1, 2004. This information will be handled in a manner consistent with the principles of Zion's Policy to Protect Personal Information. Individuals wishing to review their personal information held by Zion may contact the Privacy Officer and may request the information be deleted.

Consent may be withdrawn by an individual. The individual shall be informed of the implications of the withdrawal.

Documents such as news releases or electronic communications will give individuals the option not to receive information in the future and provide a means for them to unsubscribe from future mailings and to remove their address from the mailing list.

### 4. Limiting collection

Information is collected by Zion for the purposes identified and is collected in a fair and lawful manner, consistent with the principles of the Privacy Policy. Information may be collected on an application or registration form or verbally. If collected verbally, the person gathering the information will record the date, the reason for collecting the information and an indication that consent was given.

The personal information collected is usually limited to name, title, gender, address, telephone number, email address and congregational or committee membership.

### 5. Limiting use, disclosure and retention

Personal information will only be used for the purposes identified.

Personal information can only be accessed by staff persons and occasionally Zion volunteers. All staff and volunteers will be provided guidance about how to appropriately use, retain and protect personal information.

Personal information will not be disclosed to any third party without an individual's consent. If personal information is to be published either in a document or on Zion website, express consent will be obtained from the individual(s) to publish their information prior to publication.

Personal information may be retained indefinitely by the Eastern Synod, as the information is

often used to compile statistical, archival and historical records about the church. Individuals may request that their personal information be deleted.

## 6. Accuracy

Zion will endeavour to ensure that personal information collected and used is accurate. However, individuals are relied upon to inform the church of changes to their personal information. Changes should be communicated to the applicable synod office.

Individuals may request access to their personal information to review it for accuracy by contacting Zion's Privacy Officer.

## 7. Safeguarding information

Personal information at Zion is normally stored in Rasmus, the Eastern Synod national database. Rasmus is protected by passwords and encryption. Only staff members of the national and synodical offices, Zion clergy and office administrator and occasionally trusted volunteers have access to personal information in Rasmus.

Information that is printed such as mailing lists, committee membership lists, etc. will be protected against loss, theft or unauthorized access by ensuring such information is securely filed after use. Printed personal information will be shredded prior to being discarded.

## 8. Openness

Zion will publish its policies and practices regarding the management of personal information on its website ([www.zionlutheran.ca](http://www.zionlutheran.ca)). Individuals who request information about the policy and practices may be directed to the website if appropriate or will be provided with a hardcopy of the policy and these compliance practices.

## 9. Individual access

Individuals are entitled to know what personal information Zion holds and how it is to be used, disclosed or retained. An individual may make a request to access their information by contacting the Privacy Officer. Zion will respond to such requests within a reasonable time and at no cost to the individual. Corrections to information and requests to delete information will be handled as quickly as possible.

## 10. Challenging compliance

Zion Privacy Officer will address all concerns and queries related to the collection, use and retention of personal information and will respond to any challenges as soon as possible.

Complaints or queries will be received in writing by the Privacy Officer to:

Zion Lutheran Church  
Pembroke, ON

Zion encourages any individual who has a query or complaint about the management of personal information in the church to contact the Privacy Officer.