

Governing Policies and Procedures Privacy

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1. OUR COMMITMENT TO PRIVACY AND OUR PRIVACY PRACTICES

Crossridge Church ("Crossridge") is committed to protecting the privacy, confidentiality and security of the personal information of Crossridge's members, supporters and other stakeholders. Crossridge values the trust of those Crossridge deals with and recognizes that maintaining that trust requires that Crossridge be transparent and accountable in how Crossridge treats the information that you provide to Crossridge.

During the course of Crossridge's various activities, Crossridge frequently gathers and uses personal information. Anyone from whom Crossridge collects such information should expect that it will be carefully protected and that except as otherwise legally required or permitted any use or other dealing with this information is subject to consent. Crossridge's privacy practices are designed to achieve this.

Personal information gathered by Crossridge is kept in confidence. Crossridge staff are authorized to access personal information based only on their need to deal with the information for the reasons for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. Crossridge also takes measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed.

This policy is based on the Ten Privacy Principles contained in the Canadian Standards Association (CSA) Model Code for the protection of personal information and on which the relevant privacy legislation is founded. Crossridge has tailored its own ten privacy principles in compliance with the relevant privacy legislation to meet the specific needs and expectations of its stakeholders.

2. SCOPE OF POLICY

This policy applies to personal information of individual stakeholders in the possession and control of Crossridge. This policy also does not apply to information collected, used or disclosed with respect to corporate or commercial entities that deal with Crossridge. Corporate and commercial information is protected by other policies and practices of Crossridge and through contractual arrangements.

This policy does not apply to the collection, use or disclosure of business contact information or publicly available information by Crossridge.

DEFINITIONS

In this policy:

“business contact information” means information to contact a person at a place of business, including the person’s name, position, business address, business telephone number, business email address and business fax number.

“collection” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

“consent” means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be expressed or implied. Express consent may be given orally or in writing, if it is clear and does not require any inference on the part of Crossridge. Implied consent exists when Crossridge can reasonably infer consent based upon your action or inaction.

“Crossridge” means the Crossridge Church, which operates a church in Surrey, BC.

“disclosure” means making personal information available to others outside of Crossridge.

“personal information” means information about an identifiable person that is recorded in any form but does not include his or her business contact information. Personal information includes a person’s age, gender, race, ethnic origin, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, travel history, consumer preference information, personal habits, personal interests and personal history. Personal information does not include information that cannot be associated with a specific person.

“privacy officer” means a person designated by Crossridge who is accountable for compliance with this policy by Crossridge and whose name and contact information are set out at the end of this policy.

“third party” means a person or organization other than Crossridge and you.

“use” means the treatment and handling of personal information by and within Crossridge.

“you” means a Crossridge member, supporter and anyone else for whom Crossridge collects personal information.

3. CROSSRIDGE ACCOUNTABILITY

Crossridge is accountable and responsible for personal information under its control, including information that has been transferred to a third party. In cases where such transfers take place Crossridge will ensure that the third party has comparable privacy safeguards in place. Crossridge has designated a privacy officer to ensure compliance with this policy.

Ultimate accountability for Crossridge compliance rests with the Board of Directors of

Crossridge who delegates day-to-day accountability to the privacy officer. Other persons within Crossridge may be accountable for the day-to-day collection and processing of personal information or may act on behalf of the privacy officer.

Crossridge will adopt policies, procedures and practices to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies, procedures and practices and communicate policies, procedures and practices to you.

4. IDENTIFYING THE PURPOSES OF PERSONAL INFORMATION

When collecting personal information Crossridge will orally or in writing state the purpose of collection and will provide, on request, contact information for the privacy officer who can answer questions about the collection.

Crossridge may collect your personal information for the following purposes:

- to provide and administer religious and other related services through Crossridge;
- to provide administrative services through Crossridge;
- to assess applications for membership in Crossridge by prospective members;
- to administer religious and other related policies, procedures and practices of Crossridge;
- to thank and publicly recognize members, supporters and other stakeholders;
- to provide members, supporters and other stakeholders with information about how donated funds are used by Crossridge;
- to keep Crossridge members, supporters and other stakeholders informed about Crossridge activities;
- to promote opportunities for members, supporters, potential supporters and other stakeholders to support Crossridge;
- to establish and maintain lists of Crossridge members, supporters or other stakeholders;
- to publish a directory;
- to compile statistical and historical information about Crossridge;
- to build and maintain relationships among stakeholders within Crossridge;
- to disclose information requested by third parties (with permission of Crossridge members, supporters and other stakeholders where this is required);
- to protect Crossridge, you and others from fraud and error and to safeguard the interest of Crossridge and its staff and representatives;
- to authenticate your identity;
- to ensure staff and contractors comply with their agreements and legal obligations to Crossridge;
- to administer relations with the municipal, provincial, and federal authorities, and other religious organizations with whom Crossridge has relations from time to time;
- to comply with Canada Revenue Agency requirements for gift processing;
- to comply with any legal or regulatory requirement; and
- to use and disclose for any other purpose directly or indirectly related to establishment or operation of Crossridge.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with Crossridge.

When your personal information is to be used for a purpose not previously identified, the

new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is permitted or required by law.

5. CONSENT

Crossridge will obtain your consent to collect, use or disclose personal information except where Crossridge is permitted or required by law to do so without consent. For example, Crossridge may collect, use or disclose personal information without your consent where:

- Crossridge reasonably expects that obtaining consent would compromise an investigation or proceeding;
- Crossridge's use of the information is for acting in an emergency that threatens a person's life, health or personal security;
- Crossridge is obtaining legal advice; or
- Crossridge needs to deal with an anticipated breach of law.

Crossridge will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed.

Your consent may be expressed or implied and may be given through an authorized representative such as a lawyer or agent. If you are under the legal age, your consent may be obtained from a parent or guardian.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. Consent may be implied by Crossridge if the purpose for the collection of the information would be reasonably obvious to an individual and is given voluntarily by that person for that purpose. Consent may also be implied where Crossridge notifies you that Crossridge intends to collect, use or disclose information and that you do not decline the Crossridge intended action within a reasonable period of time. The manner in which Crossridge obtains consent for the collection of personal information will vary with the sensitivity of the information being collected.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided that Crossridge is given reasonable written notice. Crossridge will inform you of the likely consequences of the withdrawal of consent, which may include the inability of Crossridge to provide certain services to you.

6. LIMITS FOR COLLECTING PERSONAL INFORMATION

Crossridge will only collect personal information that is reasonably necessary to provide a service either directly or indirectly and which is reasonably necessary for the purposes which you consented to. Crossridge will collect personal information by lawful means. Crossridge may also collect information as permitted or required by law.

7. LIMITS FOR USING, DISCLOSING AND KEEPING PERSONAL INFORMATION

Crossridge is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

Depending on the sensitivity of your personal information, Crossridge will employ

appropriate security measures to protect the information. The measures may include, for example, the physical security of offices, the limiting of access on a “need-to-know” basis and the use of passwords and encryption.

Crossridge will also use appropriate security measures when disposing of your personal information.

Crossridge will require third parties through contractual or other reasonable means to safeguard your personal information entrusted to them in a manner consistent with the policies, procedures and practices of Crossridge.

8. AVAILABILITY OF POLICIES AND PROCEDURES

Crossridge is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing. To ensure the integrity of our security procedures and business methods, Crossridge may refuse to publicly disclose certain information.

9. PROVIDING ACCESS TO YOUR PERSONAL INFORMATION

You have a right to access your personal information held by Crossridge. Upon request and confirmation of your identity, Crossridge will, within a reasonable period of time, tell you what personal information it has, what it is being used for and to whom it has been disclosed. You may be asked to be specific about the information that you would like to access and to submit your request in writing. Depending on the type and amount of information requested, Crossridge may charge you a reasonable fee for providing you with access to your information. Where a cost will be incurred by you, Crossridge will inform you of the cost and request your direction on whether or not Crossridge should proceed with the request.

Crossridge will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, Crossridge may not be able to provide access to certain personal information. The reasons for not providing this information may include that it is information that would threaten the life or security of another person, information generated in a formal dispute resolution process, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons and information that is subject to solicitor-client privilege.

If a request is refused, Crossridge will notify you in writing, setting out the reasons for the refusal and resources for redress available to you.

If your personal information is demonstrated to be inaccurate or incomplete, Crossridge will amend the information as required. Where appropriate Crossridge will send the amended information to third parties to whom the information has been disclosed.

10. COMPLIANCE AND COMPLAINTS

On request Crossridge will make the following information available:

- a description of the type of personal information held by Crossridge, including a general account of its use;
- a copy of any brochures or other information that explain the policies, procedures and practices; and
- an explanation of what personal information is made available to related organizations.
- provide information regarding its complaint response procedure.

You are to direct any complaints, concerns or questions regarding this policy in writing to the privacy officer. If the privacy officer is unable to address your concern, the issue can be referred to the Elders of Crossridge. At any point in this process you may also write to the Privacy Commissioner of the Province of British Columbia.

Contact Information:

Privacy Officer: Neil Currie

Phone: 604-807-4002

Fax:

E-mail: neil.c.currie@gmail.com