### **Personal Information Policy Commitment to Privacy Statement**

Markham Peoples Community Church (MPCC) 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 and provincial privacy legislation. This Statement of Privacy applies to the Markham Peoples Community Church Website, and its database, and governs data collection and usage. By using the Markham Peoples Community Church website, you consent to the data practices described in this statement.

Privacy legislation, including the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and provincial and territorial legislation, establishes rules for the collection, use and disclosure of "personal information." 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 following: <a href="Personal Information Protection and Electronic Documents Act (justice.gc.ca)">Personal Information Protection and Electronic Documents Act (justice.gc.ca)</a>

Markham Peoples Community Church Privacy Statement addresses two issues:

- the way Markham Peoples Community Church collects, uses, discloses, and protects personal information; and
- the right of individuals to access personal information about themselves.

Markham Peoples Community Church will follow the 10 principles for handling personal information as set out in Schedule 1 of the Personal Information Protection and Electronics Document Act of Canada (PIPEDA). These principles are:

- Accountability,
- Identifying purposes,
- Consent,
- Limiting collection and limiting use
- Disclosure and retention,
- Accuracy,
- Safeguards,
- Openness
- Individual access
- Provision of recourse

#### **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 (e.g., 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 Markham Peoples Community Church by third-party agents and contractors must comply with standards comparable to Markham Peoples Community Church Privacy Policy and applicable federal/provincial privacy legislation. Contractual provisions requiring such compliance are incorporated into all third-party agent and contractor agreements.

### **Collection of your Personal Information**

Markham Peoples Community Church collects personal information for the following intended purposes:

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

Markham Peoples Community Church also collects anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites. There is also information about your computer hardware and software that is automatically collected by Markham Peoples Community Church. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses. This information is used by Markham Peoples Community Church for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Markham Peoples Community Church Website.

# **Identifying Purposes**

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. Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Markham Peoples Community Church public message boards, this information may be collected and used by others.

Note: Markham Peoples Community Church does not read any of your private online communications. Markham Peoples Community Church encourages you to review the privacy statements of Web sites you choose to link to from Markham Peoples Community Church so that you can understand how those Web sites collect, use and share your information. Markham Peoples Community Church is not responsible for the privacy statements or other content on Web sites outside of the Markham Peoples Community Church and Markham Peoples Community Church family of Web sites.

## **Use of your Personal Information**

Markham Peoples Community Church does not sell, rent or lease its customer lists to third parties. Markham Peoples Community Church may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the

third party. In addition, Markham Peoples Community Church may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Markham Peoples Community Church, and they are required to maintain the confidentiality of your information. Markham Peoples Community Church does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

Markham Peoples Community Church keeps track of the Web sites and pages our customers visit within Markham Peoples Community Church, in order to determine what Markham Peoples Community Church services are the most popular. This data is used to deliver customized content and advertising within Markham Peoples Community Church to customers whose behavior indicates that they are interested in a particular subject area.

Markham Peoples Community Church Websites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Markham Peoples Community Church or the site; (b) protect and defend the rights or property of Markham Peoples Community Church; and, (c) act under exigent circumstances to protect the personal safety of users of Markham Peoples Community Church, or the public.

## **Accountability**

Markham Peoples Community Church 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.

#### **Use of Cookies**

The Markham Peoples Community Church Website use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Markham Peoples Community Church pages, or register with Markham Peoples Community Church site or services, a cookie helps Markham Peoples Community Church to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Markham Peoples Community Church Website, the information you previously provided can be retrieved, so you can easily use the Markham Peoples Community Church features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to

decline cookies, you may not be able to fully experience the interactive features of the Markham Peoples Community Church services or Web sites you visit.

### **Security of your Personal Information**

Markham Peoples Community Church secures your personal information from unauthorized access, use or disclosure. Markham Peoples Community Church secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

### **Safeguards**

Markham Peoples Community Church's Deacon Board has a centralized 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 at Markham Peoples Community Church. Each employee and pensioner of Markham Peoples Community Church, whether full-time, part-time, contract, or retired, has confidential and secure personnel, pension, benefits, and payroll files. Donors and third-party service providers have files that include confidential personal information. Markham Peoples Community Church's database collects personal information required to accommodate event attendance and programs. All personal information is the property of Markham Peoples Community Church and all individuals have controlled access to their personal information. Personal information is to be stored under lock and key or is password protected 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 except in cases where federal and/or provincial retention rules apply. 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 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 our behalf are required to protect confidentiality of all information in a manner consistent with that used in Markham Peoples Community Church, or as required by law.

# **Access to Personal Information**

A person has the right to access their own personal information that is in the possession or control of Markham Peoples Community Church. This right extends to knowing which third parties have received

this information from Markham Peoples Community Church. In order to access this personal information, requests should be made in writing to Markham Peoples Community Church, stating as specifically as possible which personal information is being requested. Markham Peoples Community Church has the right to refuse a request for access to personal information if

- the information is protected by solicitor-client privilege
- granting access would review confidential financial information
- doing so would 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

### **Changes to this Statement**

Markham Peoples Community Church will occasionally update this Statement of Privacy to reflect company and customer feedback. Markham Peoples Community Church encourages you to periodically review this Statement to be informed of how Markham Peoples Community Church is protecting your information.

#### **Contact Information**

Markham Peoples Community Church welcomes your comments regarding this Statement of Privacy. If you believe that Markham Peoples Community Church has not adhered to this Statement, please contact Markham Peoples Community Church at <a href="mailto:info@mpcchurch.ca">info@mpcchurch.ca</a>. We will use commercially reasonable efforts to promptly determine and remedy the problem.