

## Privacy Policy

Mission City Bible Church (“**MCBC**”) is committed to safeguarding the personal information entrusted to us. We manage personal information in accordance with Canada’s *Personal Information Protection and Electronic Documents Act* and other applicable laws.

This privacy policy (this “**Policy**”) outlines the principles and practices we follow in protecting your personal information. A copy of this Policy is available to anyone upon request and on our website at [missioncitybiblechurch.ca](http://missioncitybiblechurch.ca)

### **Application**

This Policy applies to the collection, use and disclosure of personal information by MCBC. “Personal information” means information about an identifiable individual, such as an individual’s name, address, telephone number and email address. This Policy does not apply to business contact information, because it is not “personal information” under privacy laws.

The biblical counselling Ministry may have special rules that apply, which vary or add to the provisions of this Policy. If there is an inconsistency between this general policy and their privacy policies and agreements, their policies and agreements will take precedence over this policy to the extent of the inconsistency.

### **What personal information do we collect?**

We collect only the personal information that we need for the purposes of:

- providing services and issuing receipts for donations
- purposes incidental to the provision of services by MCBC
- as required or authorized by law or legal requirements (collectively, the “Purposes”).

For example, this may include the organization, implementation and deployment of groups devoted to discipleship (e.g. Small Groups, Women’s Ministry, Men’s Ministries, etc.) and serve within the various ministries of MCBC. Personal information we may collect about you include your name, contact information, birthdate, allergies or medical conditions, marital status and images of you.

If you are serving in certain ministries (e.g., Mission City Kids or Mission City Youth) we also ask for and collect information about your past, including behaviour and police checks. We do this as part of fulfilling our role as in reviewing people’s suitability for certain types of ministry work.

In ministries where there is application for a leadership role or Missions Trip, additional information will be collected such as your personal testimony, details on your walk with Christ, previous volunteer experiences, references from inside and outside MCBC, length of time attending MCBC and attendance at classes and police background check. For Missions Trips passport information is also collected for the purpose of purchasing airline tickets.

The Biblical Counselling ministry collects personal history information in order to effectively create a care plan for the counsellee. Additional information is available from the Biblical Counselling Ministry, including the Biblical Counselling Agreement.

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***Consent***

We ask for consent to collect, use or disclose personal information as set out in this Policy, or in specific circumstances where doing so is required by law. For collecting personal information, the consent typically takes the form of a person providing the information in response to a request from us. Thereafter, personal information is used, and disclosed as provided in this Policy, or as required by law.

***How do we use and disclose personal information?***

We use and disclose personal information only for the Purposes, and may be shared with the Elders, pastors, officers, employees, volunteers and ministries of MCBC, as necessary for the Purposes. This includes, for example, personal information gathered in one context (e.g., a discipleship group) being provided to the leaders of other ministries inside MCBC; and your name, contact information and/or image that is gathered by the leader of a “Discipleship Group” being shared with the leadership of MCBC, or other ministries of MCBC.

The one exception to this sharing is with respect to Biblical Counselling, where personal information gathered by staff and volunteers in that Ministry is not shared with other groups but only with the Elders of MCBC and internally within the biblical counselling ministry at MCBC.

***Access to records containing personal information***

Subject to the terms of this Policy, individuals have a right to access their own personal information in a record that is in custody or under the control of MCBC, unless doing so would conflict with law or violate the privacy of another individual under this Policy.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of a record.

You may make a request for access to your personal information by writing to MCBC’s Compliance Officer (see below). You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information. In addition, you may request a correction of an error or omission in your personal information.

We will try to respond to your request within 45 calendar days, barring unusual circumstances. While usually there is no fee, if we incur more than nominal costs in responding to your request (other than to correct information), we may tell you in advance and then charge a small fee to cover our costs to process your request.

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***Questions and complaints***

If you have a question or concern about any collection, use or disclosure of personal information by MCBC, or about a request for access to your own personal information, please contact MCBC's Compliance Officer (see next section).

**Mission City Bible Church's *Personal Information Compliance Officer***

Jeff Kendrick is MCBC's personal information compliance officer (the "**Compliance Officer**"), whose mandate includes ensuring that MCBC complies with all applicable privacy laws. You may contact the Compliance Officer at:

Jeff Kendrick  
 Privacy Compliance Officer  
 1100 Clarence St. S. Unit 103B  
 Brantford, ON  
 N3S 7N8  
[info@missioncitybiblechurch.ca](mailto:info@missioncitybiblechurch.ca)

The role and responsibility of the Compliance Officer are described in more detail below. The Compliance Officer is given the authority to amend our Policy from time to time to reflect compliance with the law and the following general principles.

***General Principles***

**1. Accountability**

- 1.1 All persons, whether employees, volunteers, or board or team members who collect, process, or use personal information shall be accountable for such information to the Compliance Officer.
- 1.2 The Compliance Officer shall use contractual or other appropriate means as determined by the Compliance Officer to protect personal information at a level comparable to this policy while a third party has this information.
- 1.3 Personal information to be collected is done only using applications and forms approved by the Compliance Officer. All methods of retention of information are according to the Compliance Officer's instructions.
- 1.4 Any person who believes MCBC uses personal information collected, retained, or used other than for the Purposes may contact the Compliance Officer to register a complaint or to make any related inquiry.
- 1.5 Upon receiving a complaint from any person regarding the collection, retention, or use of personal information, the Compliance Officer shall promptly investigate the complaint and notify the person who complained about his/her findings and corrective action taken, if any.

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1.6 Upon receiving the response from the Compliance Officer, the person who filed the complaint may, if he/she is not satisfied, appeal to MCBC’s Board of Elders to review and determine the disposition of the complaint at issue.

1.7 The Compliance Officer shall communicate and explain this policy and give training regarding it to all employees and volunteers who might be in a position to collect, retain, or use personal information.

**2. Identifying Purposes**

2.1 The Compliance Officer shall ensure that only information needed to fulfill purposes for which the information is to be collected is asked for on the forms/applications MCBC uses.

2.2 The Compliance Officer shall ensure that the purpose is, if not as set out in this Policy, implied or specified at or before the time of collecting the personal information from an individual.

2.3 The Compliance Officer shall ensure that the information collected will not be used for any other purpose before obtaining the individual’s approval, unless the new purpose is required by law.

2.4 The Compliance Officer shall ensure that a person collecting personal information will be able to explain to the individual why this is being done.

**3. Consent**

3.1 The Compliance Officer shall ensure that the individual from whom personal information is collected consents to this and to it being used and disclosed in accordance with this Policy. A person giving consent has the right to withdraw consent.

3.2 The Compliance Officer shall take steps to ensure that an individual can reasonably understand why and how the information will be used when the consent is given. This may take the form of simply noting that the personal information shall be used and disclosed in accordance with this Policy.

3.3 The Compliance Officer shall ensure that where implied consent cannot be assumed, express consent is obtained wherever possible and appropriate.

3.4 The Compliance Officer shall ensure that the express consent obtained from an individual is clear and in an appropriately verifiable form whether it be paper form or electronic form.

3.5 The Compliance Officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The individual shall promptly be informed of the withdrawal’s implications.

3.6 Individuals have the right to access their personal data, to object to the processing of their personal data, to correct and, in accordance with this Policy, erase their personal data and to export their personal data.

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**4. Limiting Collection**

4.1 The Compliance Officer shall ensure that personal information is not collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfill the purposes identified.

4.2 The Compliance Officer shall ensure that information is collected only by fair and lawful means.

**5. Limiting Use, Disclosure, and Retention**

5.1 The Compliance Officer shall take steps to ensure personal information is not used or disclosed for purposes other than the Purposes.

5.2 The Compliance Officer shall ensure that all personal information is destroyed, erased, or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. Except as required to be retained by law, all personal information shall be deleted, erased, or made anonymous no later than seven years after the purpose for which it was collected has been completed.

**6. Accuracy**

6.1 The Compliance Officer shall take all reasonable steps to ensure that personal information is sufficiently up to date to minimize the possibility that inappropriate information might be used to make a decision about an individual.

6.2 The Compliance Officer shall ensure that MCBC does not routinely update personal information, unless it is necessary to fulfill the Purposes.

**7. Safeguards**

7.1 The Compliance Officer shall ensure that MCBC has security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. This shall reflect the level of sensitivity of such information, and may touch on the amount, distribution, format, and the method of storage.

7.2 The Compliance Officer shall ensure that the protection methods include,  
 a. physical measures, for example, locked filing cabinets and restricted access to offices;  
 b. organizational measures, for example, security clearance and limiting access on a “need-to-know” basis; and  
 c. technological measures, for example, the use of passwords and encryption.

7.3 The Compliance Officer shall ensure that all employees and volunteers know the importance of keeping personal information confidential.

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7.4 The Compliance Officer shall ensure that care is taken when personal information is disposed of or destroyed to prevent unauthorized parties from gaining access to it.

**8. Openness**

8.1 The Compliance Officer shall ensure that MCBC is open about its policies and practices regarding the management of personal information, and such information will be made available without unreasonable effort in a form generally understandable.

**9. Individual Access**

9.1 The Compliance Officer shall ensure that upon request MCBC shall inform an individual whether MCBC holds personal information about him/her. Subject to this Policy, MCBC shall allow the individual access to their information. MCBC shall also disclose the use that has been made or is being made of this information and disclose (subject to law) the third parties to whom it has been disclosed. If the Compliance Officer believes for valid reasons that access to personal information should be denied, he/she shall consult legal counsel before making such a decision.

9.2 A person requesting his/her personal information may be required by the Compliance Officer to give sufficient information to permit MCBC to provide an account of the existence, use, and disclosure of personal information. Information shall be used only for the purpose for which it was obtained.

9.3 The Compliance Officer shall ensure that MCBC responds to an individual's request within a reasonable time and at minimal or no cost to the individual. The requested information shall be made available in a generally understandable form. For example, MCBC shall explain abbreviations or codes it uses to record information.

9.4 The Compliance Officer shall ensure that when an individual successfully demonstrates the inaccuracy or incompleteness of personal information, MCBC shall amend the information as required. Depending on the information challenged, amendment involves the correction, deletion, or addition of information. When appropriate, the amended information shall be transmitted to third parties having access to the information in question.

9.5 The Compliance Officer shall ensure that when a challenge is not resolved to the individual's satisfaction, MCBC shall record the unresolved challenge's substance. When appropriate, the unresolved challenge's existence shall be transmitted to third parties having access to the information in question.

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### 10. Challenging Compliance

10.1 The Compliance Officer is authorized to address a challenge concerning compliance with this Policy.

10.2 The Compliance Officer shall develop procedures to receive and respond to complaints or inquiries about this Policy or, generally, MCBC's policies and practices regarding the handling of personal information.

10.3 The Compliance Officer shall inform individuals inquiring about lodging complaints that relevant complaint procedures exist.

10.4 The Compliance Officer shall investigate all complaints. If a complaint is found to be justified, the Compliance Officer shall take appropriate measures, including, if necessary, amending this Policy and any other MCBC's policies and practices.

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