

Coastal Missions Society Privacy Practices

This informs of the Society's practices concerning the collection, use and disclosure of personal information. Not merely because of laws, these practices are a reflection of the integrity standards typical of the Society.

The nature of the Coastal Missions Society's regular activities includes the collection and use of personal information. Coastal Missions is committed to protecting the accuracy, confidentiality, and security of personal information in its possession. Any individual in any capacity in connection with Coastal Missions can expect his or her personal information to be protected with the high standard of integrity typical of the Society. To uphold this standard and the privilege of trust bestowed on Coastal Missions, the privacy practices below are implemented to ensure the continued protection of personal information.

These privacy practices are based on the Canadian Standards Associations Model Code for the Protection of Personal Information which is approved as a National Standard by the Standards Council of Canada.

Definitions—

- *Collection* means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.
- *Consent* means voluntary agreement with action or proposed action. Consent may be express—given explicitly orally or in writing—or implied. Express consent is unambiguous and does not require any inference on the part of Coastal Missions. Implied consent is when consent is reasonably inferred by Coastal Missions through an individuals' action or inaction.
- *Disclosure* means making personal information available to others outside of Coastal Missions.
- *Personal information* means information about an identifiable person that is recorded in any form, except for information that is publicly available such as business contact information. Personal information includes a person's name, address, email, telephone, or other contact information, age, gender, race, ethnic origin, names of children or relatives, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, personal habits, personal interests, and personal history. In the case of workers, volunteers, or prospective volunteers, personal information also includes skills, certifications, employment history, criminal record check, and emergency contact information.
- *Stakeholder* a person or organization with interest or concern
- *Third party* means a person or organization other than Coastal Missions and the individual who the personal information identifies.
- *Use* means the treatment and handling of personal information within Coastal Missions.

Accountability—Coastal Missions Society is accountable and responsible for personal information in its control, including information transferred to a third party. The designated Privacy Officer, Sarah-C Buschhaus and ultimately the Board of Directors, is accountable for Coastal Missions' compliance to the privacy practices.

The Privacy Officer responds to complaints and requests for access to privacy practices or personal information. The Privacy Officer also reviews internal procedures periodically and trains Coastal Missions' workers regarding these practices.

Purpose—The purpose for which personal information is collected will be clearly identified before or at the time of collection either orally by the person collecting it or in writing. When collected information is to be used for a purpose not previously identified, the new purpose shall be identified prior to use.

The Coastal Missions collects and uses personal information as reasonably necessary for administering the Coastal Missions, including the following purposes—

- To provide administrative services through the registered Coastal Missions office
- To thank and inform supporters
- To build and maintain relationships with workers, volunteers, members, supporters, people visited on the coast, and other stakeholders
- To establish and maintain lists of members, supporters, and other stakeholders
- To disclose to members, supporters, and stakeholders for the purpose of special events
- To promote Coastal Missions Society (e.g. photo display board)
- To provide and administer programs and education
- To disclose information requested by a third party
- To protect from fraud
- To authenticate persons' identity
- To comply with Canada Revenue Agency requirements for gift processing
- To comply with any legal or regulatory requirement
- To use and disclose for any other purpose directly or indirectly related to establishment or operation of the Coastal Missions Society

Limiting Collection—Collection of information will be limited to that which is necessary for the purpose identified. Collection shall be by fair and lawful means.

Consent—Collection, use, and disclosure of personal information by Coastal Missions, except as legally or lawfully required or permitted, is subject to consent by an individual or an authorized representative. This includes both requested and volunteered personal information. Coastal Missions makes reasonable effort to ensure an individual has knowledge of how information will be used and disclosed.

Coastal Missions obtains consent in different manners depending on the sensitivity of information, as would reasonably be expected by an individual.

Express (explicit) consent is required for highly sensitive information and may be given orally, in writing, or electronically. Reasonably implied consent is sufficient for non-sensitive information. Consent is implied if the

purpose of collection, use, and disclosure is clear and an individual volunteers information for that purpose—this includes, for example, a registration form—or does not decline the collection within a reasonable time.

An example of this practice is prayer requests volunteered to Coastal Missions. Consent is implied to collect and use the information. It also implies a great trust in Coastal Missions. However, the individual must give his or her permission before Coastal Missions will disclose this information to a third party.

A second example of this practice is photographs—the intended use of the photo must be stated at the time and the individual must give his or her permission before or at the time of the photo. Permission from the individual must be obtained before the photo is shared electronically or otherwise with a third party, for example a mission supporter or church. This practice extends to “personal” photos taken while involved in Coastal Missions’ activities (e.g. while on mission voyage, vessel, or land site, a missionary represent Coastal Missions even with personal camera).

The use of photos can be an opportunity for greater ministry, for example, to write to a person and honour them by asking permission to use a particular photo. Photos displayed should then say, “used with permission.” This standard is a good example to supporters and the wider community for the proper use of photos.

Consent may be withdrawn at any time, taking into account legal restrictions and reasonable notice. Coastal Missions will inform the individual of the implications of such withdrawal.

Personal information may be collected without the knowledge and consent of an individual when permitted or required by law to do so, for example where legal, medical, or security reasons may make seeking consent impossible or inappropriate. In addition, use and disclosure of legally required information—such as the full legal name, birth date, occupation, civic and postal address, and telephone number of each Coastal Missions Society member—does not require consent.

Limiting use, disclosure, and retention—Personal information will not be used or disclosed except for purpose it was collected without consent, unless an individual’s consent is given. Coastal Missions does not share or sell address lists of supporters with other organizations. Any new purpose shall be documented and consent for use and disclosure acquired. Information will be retained only as long as is necessary to fulfill the purpose or for necessary legal or business purposes. When no longer retained, personal information will be destroyed, erased, or made anonymous.

Note—Discretion must be used pertaining to exposure of information contained in guest book(s) especially when in the hands of a guest.

Accuracy—Coastal Missions puts reasonable effort into keeping personal information used on an ongoing basis accurate, complete, and up-to-date. However, the responsibility lies with individuals to ensure contact information is current. Personal information is not routinely updated unless necessary for the purposes it was collected.

Safeguards—Coastal Missions has appropriate security measures in place to protect personal information from loss, theft, or unauthorized access, use, disclosure, copying, and modification. Personal information is protected

regardless of what format it is held. Safeguards are appropriate to the sensitivity of personal information and may include but are not limited to physical security (including disabling Internet on computers with highly sensitive information, e.g. bookkeeping computer, and securing premises), limiting access on a need-to-know basis (e.g. volunteers are not given confidential information), passwords (e.g. the database should be closed after use), and careful disposal or destruction (shredding) of personal information. Coastal Missions' workers are made aware of the importance of maintaining confidentiality of personal information.

Openness—Coastal Missions' Privacy Practices including the Privacy Officer's contact information are freely available—either electronically or in print—when requested. Upon written request, an individual receives a description of the type of personal information held by Coastal Missions and its general use, and access to his or her personal information.

Individual access—Upon specific written request Coastal Missions will inform about the existence and nature of personal information, how it is being used, and who it has been disclosed to. Such information will be provided within 30 days, or a written explanation of additional time required will be provided. Sufficient information is required to verify the identity of the individual making the request before releasing the information.

If access to information is refused because of prohibitive cost, reference to other individuals, legal, security, or commercial proprietary reasons, or because of solicitor-client or litigation privilege, Coastal Missions will notify the individual in writing with the reasons.

Information that is demonstrated to be inaccurate or incomplete will be amended as appropriate. If information remains in dispute, an individuals' opinion will be noted on the file.

Challenging—Any question or complaint about Coastal Missions' compliance to these Privacy Practices shall be directed to the Privacy Officer. If the Privacy Officer is unable to address the concern, it will be referred to the directors. On request in writing, information about the complaints procedure will be provided. If the complaint is justified in the review process, appropriate measures will be taken, including amending the Privacy Practices.

Privacy Officer, Sarah-C Buschhaus
Coastal Missions Society
Address—PO Box 77, Chemainus BC, V0R 1K0
Or may contact by—
Phone—250-246-3377 or 250-246-4960
Fax—250-246-4934
Email—coastalteam@coastalmissions.ca

An individual may write to the Privacy Commissioner at any point in the process.