

Lutheran Church - Canada, East District
Privacy Policy Report to
Congregation

How to incorporate the documents into your privacy project.

Commitment to Privacy Is a one page document that will be used to inform the congregation stakeholders that it has a Privacy Policy and to provide some **basic** information in regard to that policy.

Practical applications for stakeholders to have access to this document would be to have it displayed in your church office. It will also be posted as a PDF file on the Lutheran Church - Canada website.

This document will benefit those stakeholders who only want to be reassured that we have developed a Privacy Policy and that we have a Privacy Officer in place.

Privacy Protection Pledge

Is a three page executive summary that is used to explain why the congregation collects personal information and how it uses it, when and why a congregation discloses personal information, and how the congregation protects personal information.

Practical application for stakeholders to have access to this document would be to have it available in a printed form and given to a stakeholder when we request their personal information. This document will also be posted on the LCC website as a PDF file.

The Privacy Protection Pledge will be of the most benefit to our stakeholders as it answers the who, what, why and when questions of personal information.

Privacy Policy

Is a seven page document that identifies the principles and guidelines that the congregation has adopted for the collection, use, disclosure, and retention of personal information.. Lutheran Church- Canada is using as the foundation of its Privacy Policy the National Standard of Canada. This National standard is entitled “Model Code for the Protection of Personal Information”.

Practical Application for this document will be to include it in the Congregation Policy Manual and it will be posted on the LCC website in PDF format.

The privacy policy document will be used internally by the congregation’s church council to develop the systems and procedures required to support the Policy and insure compliance with the principles.

Personal Information Protection Agreement-

This is the two page document that Lutheran Church- Canada will sign when it discloses personal information to third parties, so as to comply with the new related obligations contained in PIPEDA.

This document will most likely be used by the congregation church council when personal information is shared with third parties.

Consent Language

Should be incorporated onto all the internal forms a congregation uses to collect personal information, there should be a signature block on the form for the stakeholder to sign.

Blessings,

Dwayne Cleave
LCC, Treasurer

CONGREGATION

COMMITMENT TO PRIVACY

Respecting the privacy and confidentiality of personal information has always been an important part of our commitment to our constituents, investors, donors, sponsors, volunteers and other stakeholders.

Effective as of January 1, 2004, the federal government's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") imposed new legal obligations for the collection, use and disclosure of personal information in the course of commercial activities. We are committed to complying with PIPEDA. As a result, we have developed:

- (a) a **Privacy Protection Pledge**, which explains why we collect personal information, how we use personal information, when and why we disclose personal information, and how we protect personal information; and
- (b) a **Privacy Policy**, which specifies and describes the principles and guidelines that we have adopted for the collection, use, disclosure and retention of personal information.

We have also appointed a Privacy Officer, who is responsible for overseeing our Privacy Project. Our Privacy Officer is already working with our employees, volunteers and other service providers so that they are familiar with and understand our Privacy Protection Pledge and our Privacy Policy and can therefore assist us in complying with PIPEDA.

If you would like to receive copies of our Privacy Protection Pledge and our Privacy Policy or if you have any questions regarding our Privacy Project, please contact our Privacy Officer by:

- (a) telephone:
- (b) mail:
- (c) e-mail:

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's Internet web site at: www.privcom.gc.ca

OUR PRIVACY PROTECTION PLEDGE

In order to comply with the federal government's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*") that regulates the collection, use and disclosure of personal information in commercial activities, we have developed this Privacy Protection Pledge and Privacy Policy.

The following is a brief summary of our privacy practices:

What is personal information?

Personal information is any information that can be used to identify, distinguish or contact a specific individual.

Why do we collect personal information, and how do we use it?

In carrying out our organizational activities, we collect and use personal information about the members, donors, volunteers and other constituents or stakeholders of our Congregation (collectively, our "*Stakeholders*") only for the following purposes:

1. To identify our Stakeholders;
2. To establish and maintain responsible relationships with our Stakeholders;
3. To understand, develop and/or enhance the needs, desires, concerns or opinions of our Stakeholders;
4. To carry out our organizational activities, all with a view to advancing the goals of our Mission Statement;
5. To manage and develop our business and operations;
6. To meet legal and regulatory requirements;
7. To record the history of our Congregation, which may be shared with Lutheran Church-Canada as well as with any District of Lutheran Church-Canada and their respective agencies and affiliates, and which may be made available to the public through the Lutheran Historical Institute; and
8. To communicate with our Stakeholders, to keep our Stakeholders advised of our activities, to send important notices to our Stakeholders, to respond to special needs or inquiries, and to send information regarding our mission and ministry, as well as that of Lutheran Church-Canada, any District of Lutheran Church-Canada, and their respective agencies and affiliates. For example, we may use personal information to send our Stakeholders information regarding:
 - ministry resources and services,
 - selected third-party suppliers,
 - Congregation financial initiatives,
 - estate planning information,
 - continuing education opportunities,

- the source of books, services and merchandise which are available by various vendors, and
- the provision of gifting opportunities.

When do we disclose personal information?

We may need to disclose some personal information about an individual in each of the following situations:

1. To our pastors, employees, contractors, directors and volunteers;
2. To our external auditors or legal counsel;
3. To a person who is an authorized agent of that individual. For example, we may provide information about an individual's investments or donations to that individual's legal, accounting or financial advisors;
4. To a third party who requires such information in order to assist us in the general administration and/or operation of our business and/or the supply of products and/or services to that individual;
5. To a third party who requires such information and who is affiliated with or otherwise related to or part of Lutheran Church-Canada (including Lutheran-Church Canada, any District of Lutheran-Church Canada, and any of their respective agencies and affiliates);
6. To a third party with whom we may at any time in the future be negotiating for the purpose of that third party taking over some or all of our activities;
7. To a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by the disclosure of the information;
8. To a third party where that individual has consented to such disclosure; and
9. To a third party where such disclosure is required or permitted by law.

Any disclosure of an individual's personal information that is contemplated in any of items 1 to 8, both inclusive, will be made on a "need to know" and, where appropriate, on a confidential basis. We use contractual or other means to protect the information and to make sure that the information is used only for the purpose(s) for which it was disclosed.

How do we protect personal information?

In order to protect the personal information of a Stakeholder, we will:

1. Not collect, use or disclose personal information for any purpose other than those identified above, except with further consent. Consent for any of the identified purposes or for any additional purpose can be provided in writing, orally or electronically. Consent can be express or it may be deemed or implied in appropriate circumstances;
2. Protect personal information with security safeguards that are appropriate to the sensitivity of the information;
3. Protect the confidentiality of personal information when dealing with other organizations;
4. Use reasonable efforts to keep personal information as accurate and up-to-date as is necessary for the purposes for which it is to be used and/or disclosed; and
5. Respond to any request a Stakeholder may make for access to their personal information. We will need to verify the identity of that Stakeholder before we can respond to their

request. If we deny that Stakeholder's request for access to their personal information, we will provide an explanation in writing.

What are your choices?

Your consent is needed for us to continue to collect, use and disclose your personal information for the purposes identified above. You do have choices, and you may refuse or withdraw your consent as follows:

1. You may refuse to provide your personal information to us. You may also withdraw your consent for us to collect, use or disclose your personal information at any time, subject to legal or contractual restrictions and reasonable notice. However, in either case, this may limit or eliminate altogether our ability to serve you as a member, donor, volunteer or other constituent or stakeholder of our Congregation, to involve you in other Congregation or Lutheran Church-Canada organizational activities and/or to communicate with you.
2. You may have your name removed from our telephone, mail or e-mail lists. We use these lists to inform you of relevant activities or initiatives that we are contemplating or undertaking and that we think may be of interest to you.

If you have any questions or concerns about our privacy practices, please contact our Privacy Officer by:

1. telephone:
2. mail:
3. e-mail:

If you do not advise us to the contrary, we assume that we have your consent to collect, use and disclose your personal information (including personal information that we have previously collected) for the identified purposes and in a manner consistent with our Privacy Policy. Please note that our Privacy Policy only applies to personal information and not to corporate information.

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's Internet web site at: www.privcom.gc.ca

OUR PRIVACY POLICY

BACKGROUND

In order to comply with the federal government's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") that regulates the collection, use and disclosure of personal information in commercial activities, we have developed this Privacy Policy. We have adopted as the foundation of our Privacy Policy the 10 Principles that are set out in the National Standard of Canada entitled "*Model Code for the Protection of Personal Information*" and that form part of PIPEDA. Our objective is to promote responsible and transparent personal information management practices.

The following principles guide us in the collection, use, disclosure and retention of personal information. Since we regularly review all of our policies and procedures, and since privacy law can be expected to evolve in Canada as the Office of the Privacy Commissioner and the courts provide guidance as to the application of PIPEDA to specific fact situations, as PIPEDA may itself be amended and as provincial privacy laws are enacted, we may change our Privacy Policy at any time or from time to time.

SCOPE AND APPLICATION

The scope and application of our Privacy Policy is as follows:

1. The 10 Principles that form the basis of our Privacy Policy are interrelated, and we will strive to adhere to them as a whole.
2. Our Privacy Policy applies to personal information about the members, volunteers, donors, and other constituents or stakeholders of our Congregation (collectively, our "*Stakeholders*") that we collect, use or disclose in the course of commercial activities.
3. Our Privacy Policy applies to the management of personal information in any form, whether written, oral or electronic.
4. Our Privacy Policy does not impose any limits on our collection, use or disclosure of any of the following information:
 - (a) an individual's name, address and telephone number that appears in a telephone directory that is available to the public, where the individual can refuse to have their personal information appear in such a directory;
 - (b) an employee's name, title, business address or telephone number; or
 - (c) other information about an individual that is publicly available or that is specified by regulation pursuant to PIPEDA.

5. The application of our Privacy Policy is subject to the requirements and provisions of PIPEDA, the regulations enacted thereunder and any other applicable legislation, regulation, court order or other lawful authority.

GOVERNING PRINCIPLES

Principle 1 – Accountability

We are responsible for personal information in our possession or under our control.

- 1.1 Responsibility for compliance with the provisions of our Privacy Policy rests with our Privacy Officer, who can be reached by using the contact information at the end of this Privacy Policy. Other individuals within our organization may be delegated to act on behalf of our Privacy Officer or to take responsibility for the day-to-day collection and processing of personal information.
- 1.2 We will implement policies and procedures to give effect to our Privacy Policy, including:
 - (a) implementing procedures to protect personal information and to oversee our compliance with our Privacy Policy;
 - (b) developing information materials to explain our policies and procedures;
 - (c) training our pastors, employees, contractors, directors and volunteers about our policies and procedures; and
 - (d) establishing procedures to receive and respond to inquiries or complaints.

Principle 2 - Identifying Purposes for Collection of Personal Information

We will identify the purposes for which personal information is collected at or before the time the information is collected.

- 2.1 We collect personal information only for the following purposes:
 - (a) to identify our Stakeholders;
 - (b) to establish and maintain responsible relationships with our Stakeholders;
 - (c) to understand, develop and/or enhance the needs, desires, concerns or opinions of our Stakeholders;
 - (d) to carry out our organizational activities, all with a view to advancing the goals of our Mission Statement;
 - (e) to manage and develop our business and operations;
 - (f) to meet legal and regulatory requirements;
 - (g) to record the history of our Congregation, which may be shared with Lutheran Church-Canada as well as with any District of Lutheran Church-Canada and their respective agencies and affiliates, and which may be made available to the public through the Lutheran Historical Institute; and
 - (h) to communicate with our Stakeholders, to keep our Stakeholders advised of our activities, to send important notices to our Stakeholders, to respond

to special needs or inquiries, and to send information regarding our mission and ministry, as well as that of Lutheran Church-Canada, any District of Lutheran Church-Canada, and their respective agencies and affiliates. For example, we may use personal information to send our Stakeholders information regarding:

- ministry resources and services,
- selected third-party suppliers,
- Congregation financial initiatives,
- estate planning information,
- continuing education opportunities,
- the source of books, services and merchandise which are available by various vendors, and
- the provision of gifting opportunities.

2.2 When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose will be identified prior to use. Unless the new purpose is permitted or required by law, consent will be required before the personal information will be used or disclosed for the new purpose.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate.

- 3.1 In obtaining consent, we will use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information is being collected and will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by that individual.
- 3.2 Generally, we will seek consent to use and disclose personal information at the same time as we collect the information. However, we may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.
- 3.3 In determining the appropriate form of consent, we will take into account the sensitivity of the personal information and the reasonable expectations of the individual to whom the personal information relates.
- 3.4 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact us for more information regarding the implications of withdrawing consent.

- 3.5 In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of the individual. For example:
- (a) if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated;
 - (b) if seeking the consent of the individual might defeat the purpose for collecting the information, such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law, or that of a foreign jurisdiction;
 - (c) if there is an emergency where the life, health or security of an individual is threatened; or
 - (d) if disclosure is to a lawyer representing us, to comply with a subpoena, warrant or other court order, or is otherwise required or authorized by law.

Principle 4 - Limiting Collection of Personal Information

We will limit the collection of personal information to that which is necessary for the purposes that we have identified. We will collect personal information by fair and lawful means.

- 4.1 Generally, we will collect personal information from the individual to whom it relates. With your consent, personal information may be gathered from you personally, on the telephone, through the mail or over the Internet.
- 4.2 We may also collect personal information from other sources including employers or personal references, or other third parties who represent that they have the right to disclose the information.
- 4.3 The personal information typically collected and maintained by us includes an individual's:
- (a) name,
 - (b) mailing address,
 - (c) e-mail address,
 - (d) telephone number,
 - (e) date of birth,
 - (f) place of employment,
 - (g) photographs,
 - (h) baptismal records,
 - (i) marriage records,
 - (j) burial records,
 - (k) participation and/or membership in classes and groups with the Congregation,
 - (l) participation and/or membership in Congregation boards and committees,
 - (m) charitable contributions and pledges,
 - (n) list of talents and areas of interest,

- (o) attendance and communion records, and
- (p) Confirmation records

The information so collected depends upon the project, committee or purpose disclosed at the time of collection.

- 4.4 We may also request personal information from an individual to assist us in making mission and ministry decisions. For example, we may collect and use personal information to assess the strengths and weaknesses of workers and volunteers so that we are able to match a congregation's needs with a worker's strengths.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

We will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. We will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

- 5.1 We may disclose an individual's personal information to:

- (a) our pastors, employees, contractors, directors and volunteers;
- (b) our external auditors or legal counsel;
- (c) a person who is an authorized agent of that individual. For example, we may provide information about an individual's donations to that individual's legal, accounting or financial advisors;
- (d) a third party who requires such information in order to assist us in the general administration and/or operation of our business and/or the supply of products and/or services to that individual;
- (e) a third party who requires such information and who is affiliated with or otherwise related to or part of Lutheran Church-Canada (including Lutheran Church-Canada, any District of Lutheran Church-Canada, any of their respective agencies and affiliates.
- (f) a third party with whom we may at any time in the future be negotiating for the purpose of that third party taking over some or all of our activities;
- (g) a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by the disclosure of the information;
- (h) a third party where that individual has consented to such disclosure; and
- (i) a third party where such disclosure is required or permitted by law.

- 5.2 Only our pastors, employees, contractors, directors and volunteers with a business need to know, or whose duties or services reasonably so require, are granted access to personal information about a Stakeholder.

- 5.3 We will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about an individual, we will retain, for a period of time that is reasonably sufficient to allow for access by that individual, either the actual information or the rationale for making the decision.
- 5.4 We will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

Principle 6 - Accuracy of Personal Information

Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

- 6.1 Personal information used by us will be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.
- 6.2 We will update personal information about an individual as necessary to fulfill the identified purposes or upon notification by that individual.

Principle 7 - Security Safeguards

We will protect personal information through the use of security safeguards appropriate to the sensitivity of the information.

- 7.1 We will use appropriate security measures to protect personal information against such risks as loss or theft or unauthorized access, disclosure, copying, use, modification or destruction, regardless of the format in which it is held.
- 7.2 We will protect personal information disclosed to third parties by contractual or other means stipulating the purposes for which it is to be used and the necessity to provide a comparable level of protection.

Principle 8 - Openness Concerning Policies and Procedures

We will make readily available to our Stakeholders specific information about our policies and procedures relating to our management of personal information.

Principle 9 - Access to Personal Information

We will inform an individual of the existence, use and disclosure of his or her personal information upon request, and will give the individual access to that information. An individual will be able to challenge the accuracy and completeness of the information and request to have it amended as appropriate.

- 9.1 Upon request, we will provide a Stakeholder with a reasonable opportunity to review the personal information in that individual's file. Personal information will be provided in an understandable form within a reasonable time and at minimal or no cost to the individual.
- 9.2 In certain situations we may not be able to provide access to all of the personal information we hold about an individual. In such a case, we will provide the reasons for denying access upon request. For example:
 - (a) if doing so would likely reveal personal information about another individual or could reasonably be expected to threaten the life or security of another individual;
 - (b) if doing so would reveal any of our confidential information;
 - (c) if the information is protected by solicitor-client privilege;
 - (d) if the information was generated in the course of a formal dispute resolution process; or
 - (e) if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law, or that of a foreign jurisdiction.
- 9.3 Upon request, we will provide an account of the use and disclosure of personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, we will provide a list of organizations to which we may have disclosed personal information about the individual when it is not possible to provide an actual list.
- 9.4 In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit us to account for the existence, use and disclosure of personal information and to authorize access to a particular file. Any such information will be used only for this purpose.
- 9.5 We will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the individual's file. Where appropriate, we will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.
- 9.6 Individuals can obtain information or seek access to their personal information by contacting our Privacy Officer during our office hours.


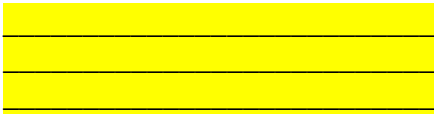

Principle 10 - Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to our Privacy Officer.

- 10.1 We will maintain procedures for addressing and responding to all inquiries or complaints from any Stakeholder about our handling of personal information.
- 10.2 We will inform Stakeholders about the existence of these procedures as well as the availability of complaint procedures.
- 10.3 Our Privacy Officer may seek external advice where appropriate before providing a final response to individual complaints.
- 10.4 We will investigate all complaints concerning compliance with our Privacy Policy. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including, if necessary, amending our policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.

ADDITIONAL INFORMATION

For more information regarding our Privacy Project, please contact our Privacy Officer by:

1. telephone: 
2. mail: 
3. e-mail: 

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's web site at: www.privcom.gc.ca

PERSONAL INFORMATION PROTECTION AGREEMENT

BETWEEN

**(the "Congregation")
and**

[Redacted] (the "**Recipient**")

By signing below, both the Congregation and the Recipient hereby agree that:

- (a) this document, immediately upon it being signed by both parties, constitutes a Personal Information Protection Agreement (the "**Agreement**") for purposes of *The Personal Information Protection and Electronic Documents Act (Canada)* ("**PIPEDA**") which is binding on both parties;
- (b) pursuant to this Agreement, the Congregation may from time to time disclose to the Recipient personal information as described in Schedule A attached hereto (with all such personal information so described therein and actually disclosed to the Recipient being herein called the "**Disclosed Information**");
- (c) it is the intention of both the Congregation and the Recipient that the Disclosed Information will be used by the Recipient only for the purpose(s) described in Schedule A attached hereto (with all such uses being herein called the "**Authorized Uses**") and for no other purpose whatsoever; and
- (d) this Agreement shall be governed by and interpreted in accordance with the laws in force. (including PIPEDA).

By signing below, the Congregation hereby confirms that it has satisfied itself that either it or a third party acting on its behalf has obtained whatever consents are required in order for the Congregation to disclose to the Recipient the personal information described in Schedule A attached hereto and for the Recipient to use such information as contemplated by the Authorized Uses.

By signing below, the Recipient hereby agrees:

- (a) to use the Disclosed Information only for the Authorized Uses and for no other purpose whatsoever;
- (b) to treat the Disclosed Information as confidential information and to otherwise safeguard the Disclosed Information in a manner that either meets or exceeds the security safeguards adopted by the Congregation from time to time and that are communicated to the Recipient regarding the Congregation's collection, use and disclosure of personal information, with the Congregation's current security safeguards being described in Schedule B attached hereto;
- (c) to also comply with any additional reasonable directions given to it by the Congregation for the purpose of providing additional protection for any Disclosed Information;
- (d) to limit the disclosure of Disclosed Information to its employees and/or independent contractors who have a need to know that Disclosed Information in order for the Recipient to use that Disclosed Information for the Authorized Uses;
- (e) that all Disclosed Information remains the property of the Congregation and to return all Disclosed Information to the Congregation immediately upon being requested to do so; and
- (f) to indemnify the Congregation and its directors, officers, employees, agents and representatives in respect of any claim, investigation, demand, action, cause of action, damage, loss, cost, liability or expense which may be made against or incurred by any of them and that relates to or arises out of any breach by the Recipient (which shall include any breach by any of the Recipient's employees and/or independent contractors) of any provision of this Agreement, with such indemnity to survive any termination or expiration of this Agreement by either party for any reason whatsoever.

[Redacted]
(insert name of Recipient)

CONGREGATION

[Redacted]
(insert name of signing officer)

[Redacted]
(insert name of signing officer)

[Redacted]
(signature of signing officer)

[Redacted]
(signature of signing officer)

[Redacted]
(date of signature)

[Redacted]
(date of signature)

**SCHEDULE A
DESCRIPTION OF PERSONAL INFORMATION AND AUTHORIZED USE(S)**

DESCRIPTION OF PERSONAL INFORMATION TO BE DISCLOSED:

DESCRIPTION OF USE(S) TO BE MADE OF THE DISCLOSED PERSONAL INFORMATION:

**SCHEDULE B
MINIMUM SECURITY SAFEGUARDS REGARDING PERSONAL INFORMATION**

The Congregation protects personal information by security safeguards appropriate to the sensitivity of the information.

- 1) The Congregation protects personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.
- 2) The Congregation protects personal information disclosed by it to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.
- 3) All of the Congregation's employees or independent contractors with access to personal information are contractually required to respect the confidentiality of that information.
- 4) The nature of the safeguards will vary depending on the sensitivity, amount, distribution and format of the information, and the method of storage. More sensitive information will be safeguarded by a higher level of protection.
- 5) The methods of protection will include:
 - (a) physical measures - for example, locked filing cabinets and restricted access to offices;
 - (b) organizational measures - for example, controlling entry to data centers and limiting access to information on a "need-to-know" basis;
 - (c) technological measures - for example, the use of passwords and encryption; and
 - (d) investigative measures, in cases where the Congregation has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

CONSENT

TO: _____ (the "*Congregation*")

The undersigned hereby consents to the Congregation collecting, using and disclosing the undersigned's personal information, as well as the personal information of any of the undersigned's children who are not old enough to provide their own consent, in the manner described in the Congregation's Privacy Protection Pledge attached hereto, which the undersigned has read and understands.

(name of Congregation member – please print)

(signature of Congregation member)

(date of signature)