

## **PRIVACY POLICY**

### **ST. VLADIMIR'S UKRAINIAN ORTHODOX CONGREGATION AT CALGARY** (hereinafter referred to as the "Congregation")

The *Personal Information Protection Act* (the "Act") regulates the way private sector organizations within Alberta collect, use and disclose personal information. "Personal Information" means information about an identifiable individual. St. Vladimir's Ukrainian Orthodox Congregation at Calgary (the "Congregation") recognizes the importance of privacy and recognizes the sensitivity of personal information received by it in the course of its congregational business.

The Congregation recognizes its obligation to maintain the confidentiality of its members' information, and also its obligations concerning all individuals' personal information, which it collects, uses or discloses in its business. This policy has been developed with those obligations in mind.

#### ***The Congregation's Need for Personal Information***

To be able to perform its congregational business, the Congregation needs to collect all relevant facts and information that relate to its members. The information collected will necessarily include personal information about the congregation members and about individuals other than congregation members. The personal information collected by the Congregation will be used for communication with the Congregation's members, publication of a contact list of all members, making announcements relating to members such as members' birthdays and publication of a membership to enable to permit members to communicate with each other, disclosure to the Ukrainian Orthodox Consistory, disclosure to other branches of the Ukrainian Orthodox Church of Canada, and to its affiliates.

#### ***Collection, Use and Disclosure of Personal Information***

Where practical, the Congregation will try to collect personal information directly from the person to whom the information pertains. Where necessary, the Congregation will collect personal information from other sources. The Congregation will collect only the personal information necessary for the purposes stated in the previous paragraph. An individual may elect not to permit collection of personal information by calling the Congregation office and requesting the deletion of a member's personal information or by so electing at the time of application for membership.

The Act provides that an individual is deemed to consent to the collection, use or disclosure of personal information about that individual for a particular purpose if the individual voluntarily provides the information for that purpose, and it is reasonable that a person would voluntarily provide that information.

By joining the congregation, the Congregation considers that an individual consents to the Congregation's collection, use or disclosure of that individual's personal information as necessary to properly perform its duties to its members.

It is the Congregation's policy to collect personal information about individuals other than its members in accordance with the provisions of the Act.

When the Congregation collects personal information about individuals directly from them, except when their consent to the collection is deemed, the Congregation will tell them the purpose for which the information is collected, and the name of the person who can answer questions about the collection.

The Act also permits the Congregation to collect, use or disclose personal information about an individual in some circumstances without the individual's consent. Such circumstances include (but are not limited to) situations in which:

- the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- the collection, use or disclosure is reasonable for the purposes of an investigation or proceeding;
- the personal information is available to the public from a prescribed source; or
- the collection, use or disclosure is required or authorized by a statute or regulation of Alberta or Canada.

When the Congregation collects, uses or discloses personal information, it will make reasonable efforts to ensure that it is accurate and complete. The Act also allows the Congregation, for legal or business purposes, to retain personal information for as long as is reasonable.

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

The Congregation recognizes its legal obligations to protect the confidential information of its members. The Congregation recognizes its legal obligations to protect the personal information it has gathered about its members and about other individuals during the course of its congregational business.

The Congregation has made arrangements to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information.

### ***Requests for Access to Personal Information***

The law permits individuals to submit written requests for the Congregation to provide them with:

- their personal information under the Congregation's custody or control;
- information about the purposes for which their personal information under the Congregation's custody or control has been and is being used by the Congregation; and
- the names of persons to whom and the circumstances in which their personal information has been and is being disclosed by us.

The Congregation will respond to requests in the time allowed by the Act and will make a reasonable effort to assist applicants and to respond as accurately and as completely as reasonably possible. All requests may be subject to any fees and disbursements the law permits the Congregation to charge.

An individual's ability to access his or her personal information under control of the Congregation is not absolute. The law provides that the Congregation must not disclose personal information where:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure would reveal personal information about another individual; or
- the disclosure would reveal the identity of an individual who has in confidence provided the Congregation with an opinion about another individual, and the individual providing the opinion does not consent to the disclosure of his or her identity.

The law further provides that the Congregation may choose not to disclose personal information where:

- the personal information is protected by any legal privilege;
- the disclosure of the information would reveal confidential commercial information and it is not unreasonable to withhold that information;
- the personal information was collected by the Congregation for an investigation or legal proceeding;
- the disclosure of the personal information might result in similar information no longer being provided to the Congregation when it is reasonable that it would be provided;
- the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act
  - under an agreement;
  - under an enactment;
  - or by a court; or
- the personal information relates to or may be used in the exercise of prosecutorial discretion.

The Act indicates that it is not to be applied so as to affect any legal privilege. The Congregation will not disclose information that is privileged where the applicant is not the member in whom the privilege is vested.

### ***Requests for Correction of Personal Information***

The law permits individuals to submit written requests to the Congregation to correct errors or omissions in their personal information that is in its custody or control. The Congregation will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organization to whom the Congregation has disclosed the incorrect information; or
- decide not to correct the personal information but to annotate the personal information that a correction was requested but not made.

### ***Contacting or Communicating with the Congregation***

If a member has any questions with respect to the Congregation's policies concerning the handling of a member's personal information, or if a member wishes to request access to, or correction of, a member's personal information under the care and control of the Congregation, the member may contact our Privacy Officer at:

**Attention: Privacy Officer**

**St. Vladimir's Ukrainian Orthodox Congregation at Calgary  
404 Meredith Road NE  
Calgary AB T2E 5A6**

**Phone: 403-264-3437**

**Email: [administrator@stvlads.com](mailto:administrator@stvlads.com)**

If a member is dissatisfied with the Congregation's handling of a member's personal information, the member is invited to contact the Congregation's Privacy Officer in writing, setting out the reasons for the member's concern. If the member remains dissatisfied after the Congregation's Privacy Officer has reviewed and responded to the member's concern, the member may wish to contact the Office of the Information and Privacy Commissioner at:

**OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER (CALGARY)  
Suite 500, 640 – 5<sup>th</sup> Ave SW  
Calgary AB T2P 3G4**

**Phone: 403-297-2728**

**Fax: 403-297-2711**

**Toll Free: 1-888-878-4044**