

PRIVACY POLICY FOR EMPLOYEES

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. The Congregation recognizes the importance of privacy and recognizes the sensitivity of personal information received by it in the course of its congregation 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 congregation business, including personal information of its employees. This policy has been developed with those obligations in mind.

Employee Personal Information

An employee is someone employed by the Congregation or someone who performs a service for the Congregation and includes a volunteer, a student, a temporary employee, and those in a contract or agency relationship with the Congregation.

Employee personal information refers to an employee's personal information reasonably required by the Congregation that is collected, used or disclosed for the purposes of establishing, managing or terminating an employment or volunteer relationship, but does not include personal information not related to that relationship.

Collection, Use and Disclosure of Personal Information

The law provides that the Congregation can collect, use and disclose an individual's employee personal information without consent if the individual is an employee of the organization or if it is for the purpose of recruiting a potential employee, but only if:

- the collection, use or disclosure is reasonable for the purposes for which it is being collected, used, or disclosed;
- the information is related to the employment relationship with the Congregation; and
- the Congregation has, with employees, provided notification to employees before collecting, using or disclosing the information that it is doing so and the purposes for doing so.

Where practical, the Congregation tries to collect employee personal information directly from the person to whom the information pertains. Where necessary, the Congregation collects personal information from other sources.

When collecting employee personal information from other sources, or when using or disclosing the personal information that the Congregation has collected, the Congregation will, where required, first obtain the consent of the individual.

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.

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 a person who can answer questions about the collection.

In addition to the circumstances outlined above, there are other times when the law permits the Congregation to collect, use or disclose personal information about an individual without their 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 employee personal information, the Congregation 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 personal information during the course of its congregation business.

The Congregation has therefore 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, including employees, to submit written requests to us 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 the Congregation.

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 completely as reasonably possible. The Congregation is not permitted to charge fees for requests for employee personal information.

An employee's ability to access his or her personal information under the Congregation's control 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 individual in whom the privilege is vested.

Requests for Correction of Personal Information

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

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

Contacting or Communicating with the Congregation

If an individual has any questions with respect to the Congregation's policies concerning the handling of that individual's personal information, or if an individual wishes to request access to, or correction of, that individual's personal information under the Congregation's care and control, the individual must contact the Congregation's 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

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

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

Phone: 403-297-2728

Fax: 403-297-2711

Toll Free: 1-888-878-4044