



## **EASTERN SYNOD** of the **Evangelical Lutheran Church in Canada**

### **COMPLIANCE PRACTICES: POLICY TO PROTECT PERSONAL INFORMATION IN THE EASTERN SYNOD**

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The following practices are applicable to information gathered at the congregational, synodical or national level of the Evangelical Lutheran Church in Canada. The Policy is applicable to the National church and its five synods, and protects the information used and retained by those expressions of the church. Congregations and related agencies should either adopt the ELCIC or Eastern Synod Policy making appropriate changes to the wording or create a separate policy to protect personal information in their settings.

#### **1. Accountability**

Cathy Caron, the Administrative Assistant to the Bishop, has been appointed as the Personal Information Compliance Officer (the ‘officer’) of the Eastern Synod of the Evangelical Lutheran Church in Canada.

The officer may be contacted with any query or complaint related to the collection, use or retention of personal information. If a complaint is received, the officer will investigate the complaint and take corrective action if required. If the complainant is not satisfied with the action of the officer, he/she may appeal to the Executive Officers (Bishop, Vice-Chair, Secretary and Treasurer) to review and determine the disposition of the complaint.

The officer will communicate and explain the policy to all employees and volunteers, who collect, retain or use personal information in the Eastern Synod. Information which explains the Eastern Synod’s protection of personal information policies and procedures has been prepared and is made public on the Eastern Synod website ([www.easternsynod.org](http://www.easternsynod.org)).

#### **2. Identifying purposes**

The Eastern Synod collects personal information for the following purposes:

- to create membership lists,
- to communicate with committee and board members and volunteers,
- to inform members about the life of the church,
- to maintain subscriptions to church publications,
- to register participants for church events, and
- to compile statistical and historical information about the Eastern Synod

This list is not exhaustive and it may change or be added to occasionally.

Individuals will be informed at the time of collection why information is being collected and for what purposes it will be used.

#### **3. Consent**

An individual’s consent will be sought for collection of personal information. Those collecting information will ensure that an individual can reasonably understand why and how the information will be used when consent is given.

Express consent will be obtained wherever possible. When an individual completes an application or registration form, consent to collect the information is assumed. Verbal consent will be recorded on electronic or hardcopy documents with the date and name of the person collecting the information. If consent is given in written or email form, a copy of the consent will be kept on file.

A large volume of personal information was collected prior to January 1, 2004. This information will be handled in a manner consistent with the principles of the Eastern Synod Policy to Protect Personal *Information*. Individuals wishing to review their personal information held by the Eastern Synod may contact the Privacy Officer and may request the information be deleted.

Consent may be withdrawn by an individual. The individual shall be informed of the implications of the withdrawal.

Documents such as news releases or electronic communications will give individuals the option not to receive information in the future and provide a means for them to unsubscribe from future mailings and to remove their address from the mailing list.

#### **4. Limiting collection**

Information is collected by the Eastern Synod for the purposes identified and is collected in a fair and lawful manner, consistent with the principles of the Privacy Policy. Information may be collected on an application or registration form or verbally. If collected verbally, the person gathering the information will record the date, the reason for collecting the information and an indication that consent was given.

The personal information collected is usually limited to name, title, gender, address, telephone number, email address and congregational or committee membership.

#### **5. Limiting use, disclosure and retention**

Personal information will only be used for the purposes identified.

Personal information can only be accessed by staff persons, administrators and occasionally volunteers of the national and synodical offices of the ELCIC. All staff and volunteers will be provided guidance about how to appropriately use, retain and protect personal information.

Personal information will not be disclosed to any third party without an individual's consent. If personal information is to be published either in a document or on the Eastern Synod website, express consent will be obtained from the individual(s) to publish their information prior to publication.

Individuals who would normally have their personal information published in an Eastern Synod directory will be given the option to have their personal information suppressed. If the information is to be suppressed, their contact information will be listed as the synod in which they are rostered or the office to which they relate. If a third party requests personal information about an individual who chooses to suppress their information, the individual must be contacted to obtain their consent prior to releasing the information.

Personal information may be retained indefinitely by the Eastern Synod, as the information is often used to compile statistical, archival and historical records about the church. Individuals may request that their personal information be deleted.

## **6. Accuracy**

The Eastern Synod will endeavor to ensure that personal information collected and used is accurate. However, individuals are relied upon to inform the church of changes to their personal information. Changes should be communicated to the applicable synod office.

Individuals may request access to their personal information to review it for accuracy by contacting the Eastern Synod Privacy Officer.

## **7. Safeguarding information**

Personal information in the Eastern Synod is normally stored in its Synod national database, which is protected by passwords and encryption. Only staff members of the national and synodical offices and occasional trusted volunteers have access to personal information in the database.

Information that is printed such as mailing lists, committee membership lists etc. will be protected against loss, theft or unauthorized access by ensuring such information is securely filed after use. Printed personal information will be shredded prior to being discarded.

## **8. Openness**

The Eastern Synod will publish its policies and practices regarding the management of personal information on its website ([www.easternsynod.org](http://www.easternsynod.org)). Individuals who request information about the policy and practices may be directed to the website if appropriate or will be provided with a hardcopy of the policy and these compliance practices.

## **9. Individual access**

Individuals are entitled to know what personal information the Eastern Synod holds and how it is to be used, disclosed or retained. An individual may make a request to access their information by contacting the Privacy Officer. The Eastern Synod will respond to such requests within a reasonable time and at no cost to the individual. Corrections to information and requests to delete information will be handled as quickly as possible. Subsequent changes should be advised to the appropriate synod office.

## **10. Challenging compliance**

The Eastern Synod Privacy Officer will address all concerns and queries related to the collection, use and retention of personal information and will respond to any challenges as soon as possible.

Complaints or queries will be received in writing by the Privacy Officer to:

The Eastern Synod Privacy Officer  
74 Weber St W  
Kitchener ON N2H 3Z3  
519.743.1461  
[ccaron@elcic.ca](mailto:ccaron@elcic.ca)

The Eastern Synod encourages any individual who has a query or complaint about the management of personal information in the church to contact the Privacy Officer.

*Adopted:* Eastern Synod Council - March, 2004  
*Revised:* Eastern Synod Officers – February 2018