

Privacy Policy

The Journey Dundas, a division of Wellspring Church (The Journey) is committed to respecting the privacy of its employees, congregants, donors and contacts. In demonstration of our commitment to this privacy and in voluntary compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), we have created the following Privacy Policy (The Policy). The Policy has been designed to reflect our commitment to the principles outlined in PIPEDA.

All directors, officers, employees, and volunteers of The Journey Dundas are required to comply with the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in the Policy.

All other persons or organizations who act for, or on behalf of, The Journey Dundas are also required to comply with the principles of the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in the Policy.

Principle 1 - Accountability

1.1 - The Journey Dundas is responsible for personal information which we collect, use, or distribute and any personal information in our custody or under our control.

1.2 - The Journey Dundas has appointed a Privacy Officer who will be responsible for overseeing the Policy as well as any inquiries, requests, or concerns relating to privacy matters. The Privacy Officer may, from time to time, designate one or more individuals within The Journey to act on his or her behalf.

1.3 - We will continually create and update procedures in accordance with the Policy to govern the handling of personal information and respond to complaints.

Principle 2 - Purposes

2.1 - The Journey Dundas is committed to ensuring that the purposes for which personal information is collected, used, or disclosed are identified, reasonable, and appropriate in the circumstance.

2.2 - The Journey Dundas will only collect personal information from employees, congregants, donors, and contacts that is necessary to fulfill the following purposes:

- To verify identity
- To assess ongoing suitability for employment
- To identify individual preferences
- To understand individual needs
- To provide requested products and services
- To inform regarding church priorities, policies, and practices
- To make contact for fundraising
- To meet government requirements

Principle 3 - Consent

3.1 - The Journey Dundas will obtain reasonably informed consent of employees, congregants, donors, and contacts to collect, use, or disclose personal information except where we are authorized to do so without consent.

3.2 - Consent can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the employees, congregants, donors, and contacts voluntarily provides personal information for that purpose.

3.3 - In general, the use of products and services by an employee, congregant, donor, or contact, or the acceptance of employment or benefits by an employee, constitutes implied consent for The Journey Dundas to collect, use and disclose personal information for all identified purposes. Consent may also be implied where employees, congregants, donors, and contacts are given notice and a reasonable opportunity to opt-out of their personal information being used for certain purposes and the employee, congregant, donor, or contact does not opt-out. Individuals may withdraw their consent at any time subject to legal or contractual notice, by providing reasonable notice to The Journey of their intent to withdraw their consent.

3.4 - The following are examples of when we may collect, use, or disclose the personal information of an employee, congregants, donor, or contact without their consent:

- When the collection, use, or disclosure of personal information is permitted or required by law;
- When collection is clearly in your best interests and we are unable to obtain your consent in a timely way;
- In an emergency that threatens an individual's life, health, or personal security;
- When disclosure is required for archival purposes;
- When the personal information is available from a public source (e.g., a telephone directory);
- When the personal information is available through observation at a public event to which you attended voluntarily;
- When the collection, use, or distribution is necessary to determine your suitability to receive an honor, award, or similar benefit or to be selected for a religious, athletic, or artistic purpose;
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt or other obligation;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law;
- When the personal information is voluntarily disclosed by the person to whom it applies by using equipment or data owned by The Journey (e.g., through the use of company computers, email addresses, etc.).

Principle 4 - Limiting Collection

4.1 - The Journey Dundas will limit the collection of personal information to that which is necessary for identified purposes. The Journey will only collect personal information by fair and lawful means and for purposes that a reasonable person would consider appropriate in the circumstances.

Principle 5 - Limiting Use, Disclosure, and Retention

5.1 - The Journey Dundas will not use or disclose personal information for purposes other than for those for which it was collected except with the consent of the individual or as required or permitted by law.

5.2 - The Journey Dundas will only retain personal information as long as it is needed for the purposes for which it was collected or consented to.

5.3 - When personal information collected is no longer relevant to its purpose or when it is permitted by law, The Journey Dundas will ensure that it is deleted, destroyed, or made anonymous in a secure manner.

Principle 6 - Accuracy

6.1 - The Journey Dundas will take reasonable efforts to ensure that personal information is accurate and complete.

6.2 - The Journey Dundas will update information when it is necessary to fulfill the purpose for which the information was collected or when an individual notifies us. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. This request should be directed to the Privacy Officer.

Principle 7 - Safeguards

7.1 - The Journey Dundas will routinely review and update our security measures which will include: Physical measures such as locking filing cabinets and restricted access to offices as appropriate; Organizational measures, such as security clearances and policies governing access to information; Technological measures, such as the use of passwords and encryption.

7.2 - The Journey Dundas will update information when it is necessary to fulfill the purpose for which the information was collected or when an individual notifies us. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. This request should be directed to the Privacy Officer.

7.3 - The Journey Dundas shall protect personal information disclosed to third parties by contractual agreement that stipulates the confidentiality and safeguard requirements that are comparable to our own.

Principle 8 - Openness

8.1 - The Journey Dundas is committed to making its privacy policies and procedures available and clear to all interested parties.

8.2 - Any questions or concerns regarding our policy or procedure may be directed in writing to our Privacy Officer.

Principle 9 - Individual Access

9.1 – Employees, congregants, donors and contacts have a right to access their personal information, subject to limited exceptions including, but not limited to:

- Situations of solicitor-client privilege
- Situations where disclosure may reveal the personal information of another individual
- Situations where the health or safety of an individual may be jeopardized
- Situations where the information was provided confidentially, such as the references for candidates

9.2 - A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the attention of the Privacy Officer. A reasonable fee may be charged for providing access to personal information, in which case we will inform the employee, congregant, donor or contact prior to proceeding.

9.3 - In certain situations, it may not be possible to provide access to all the personal information that is held and a request may be refused in whole or in part, providing the reasons for refusal and the recourse available. For example, information may not be provided if to do so would reveal personal information about a third party or jeopardize the security of another.

Principle 10 - Challenging Compliance

10.1 - It is The Journey Dundas's policy that all privacy related complaints shall be investigated. Complaints made regarding the Privacy Policy or the use of personal information should be made to the Privacy Officer in writing.

10.2 - The procedure of The Journey Dundas for dealing with complaints is as follows:

1. Record the date and nature of a complaint when it is received
2. Acknowledge receipt of the complaint promptly
3. Review the matter fairly and impartially, providing to the individual, where possible, access to all relevant records
4. Notify the individual of the outcome of the investigation promptly and clearly
5. If the complaint is found to be justified, we will take appropriate measures, including, if necessary, amending our policies and practices. We will also, if and as required, correct any inaccurate or incomplete information when possible

10.3 - If the Privacy Officer is unable to resolve the concern, the employee, congregant, donor or contact may also write to the Federal Privacy Commissioner.

Contact Information

ATTN: Privacy Officer
The Journey Dundas
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Phone: 289-446-1029
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