

# Harmony United Church

## Privacy and Personal Information Policy

First approved at Harmony United Church Council May 14, 2026  
Revisions approved at Harmony United Church Council June 11, 2026

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### Purpose

The purpose of this policy is to establish clear guidelines for the collection, use, retention, protection, and disclosure of personal information, both electronic and paper-based, by Harmony United Church.

This policy is intended to:

- Ensure that personal information is handled in a respectful, secure, and responsible manner
  - Guide staff, volunteers, and leaders in their responsibilities regarding privacy
  - Promote transparency and trust within the congregation and broader community
  - Demonstrate Harmony United Church's commitment to best practices consistent with the United Church of Canada and applicable privacy legislation
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### 1. Commitment to Privacy

Harmony United Church is committed to protecting the privacy, confidentiality, accuracy, and security of personal information entrusted to us.

We follow the principles of and are subject to the United Church of Canada and applicable federal and provincial privacy legislation, including the **Personal Information Protection and Electronic Documents Act (PIPEDA)** where applicable.

[UCC Privacy and Personal Information - Policy 1.11](#),  
[PIPEDA info - priv.gc.ca](#)

We recognize that safeguarding personal information is an important expression of respect, trust, and faithful stewardship.

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### 2. Scope and Application

This policy applies to all personal information collected, used, retained, or disclosed by Harmony United Church in the course of its ministries, governance, and operations.

While most church activities are not considered “commercial activities” under PIPEDA, Harmony United Church is committed to following recognized privacy best practices and conducting its work in a manner consistent with applicable legislation.

The Church Council will periodically review church activities to determine whether any fall within the scope of applicable privacy laws.

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### 3. Privacy Principles

Harmony United Church follows the **10 principles for handling personal information** [UCC Privacy and Personal Information - Policy 1.11](#), and as outlined in the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information:

- Accountability
- Identifying purposes
- Consent
- Limiting collection
- Limiting use, disclosure, and retention
- Accuracy
- Safeguards
- Openness
- Individual access
- Challenging compliance

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### 4. Definition of Personal Information

Personal information is any factual or subjective information, recorded or not, about an identifiable individual.

Examples include:

- Name, address, phone number, email
- Donation and financial information

- Pastoral care information
- Personal health information
- Employment or volunteer records
- Opinions, evaluations, or disciplinary records

Personal information does **not** include business contact information.

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## **5. Collection of Personal Information**

Harmony United Church collects personal information for purposes including:

- Worship, pastoral care, and ministry
- Membership and participation
- Programs, events, and volunteer coordination
- Stewardship and donations
- Governance and legal obligations

Personal information will only be used for the purposes for which it was collected unless additional consent is obtained.

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## **6. Types of Church Records**

Harmony United Church maintains records that may contain personal information, including:

- Baptism, marriage, and burial registers
- Membership lists and directories
- Donor and stewardship records
- Volunteer and employee records
- Committee and pastoral care records

Some records must be retained for legal or archival purposes, while others are temporary.

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## 7. Consent (Including Photo and Online Publication)

Harmony United Church uses an **opt-in approach** to consent.

- Individuals must give explicit consent before their personal information (including photos, names, or contact details) is:
  - Published in a photo directory
  - Posted on the church website
  - Shared in public or widely distributed materials
- Consent is obtained through a formal **Privacy and Publication Consent Form**
- Individuals are considered **not to have consented unless they opt in**

All members of Church Council and others whose names or images appear publicly (including on the website) are required to complete the consent form.

Consent may be withdrawn at any time with reasonable notice.

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## 8. Use and Disclosure

Personal information will only be used or disclosed:

- For the purpose for which it was collected
- With the individual's consent
- As required or permitted by law

Harmony United Church will not sell or distribute personal information to third parties.

Church directories and mailing lists are for **internal use only**.

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## 9. Accountability and Third Parties

Harmony United Church is responsible for personal information in its custody, including information handled by third parties.

When third-party service providers are used:

- They must protect personal information
- They must follow standards comparable to this policy

- Appropriate contractual safeguards will be in place
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## **10. Safeguards**

Harmony United Church employs three categories of safeguards. Examples of each are provided below:

### **10.1 Physical Safeguards**

- Locked filing cabinets
- Secure storage areas

### **10.2 Technical Safeguards**

- Password-protected systems
- Secure databases and backups

### **10.3 Administrative Safeguards**

- Limiting access to authorized individuals
- Training and awareness for staff and volunteers
- Clear procedures for handling personal information

These safeguards help prevent unauthorized access, disclosure, or misuse of personal information.

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## **11. Special Records and Archives**

### **11.1 Church Registers**

Baptism, marriage, and burial records:

- Are permanent legal and historical records
- Must be stored securely
- Are accessible only to authorized individuals

Certified copies are provided only to the individual concerned or their legal guardian.

Requests from third parties (such as genealogists) will be considered on a case by case basis.

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## **11.2 Archival Records**

Records of historical value may be transferred to church archives.

([Privacy Issues: Recordkeeping and Archives](#) )

Privacy protections continue even after transfer, and access may be restricted.

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## **12. Accuracy**

Reasonable efforts will be made to ensure personal information is accurate and up to date.

Individuals are encouraged to report changes.

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## **13. Access and Correction**

Individuals have the right to:

- Access their personal information
- Request corrections

Requests should be directed to the church office or Privacy Officer.

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## **14. Retention and Disposal**

Personal information will be:

- Retained only as long as necessary
- Destroyed securely when no longer required

Exceptions include:

- Legal requirements

- Archival or historical records, following United Church of Canada guidelines ([Privacy Issues: Recordkeeping and Archives](#) )
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## 15. Website

Where applicable:

- Limited technical information may be collected (e.g., website usage data)
  - Cookies may be used
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## 16. Email Communications

Harmony United Church uses email as a primary means of sharing information with members, including newsletters, event updates, and council notices.

Individuals must **opt in** to receive electronic communications. Consent may be withdrawn at any time by contacting the Church Office.

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## 17. Governance and Responsibility

Harmony United Church designates a **Privacy Officer** responsible for:

- Policy compliance
- Responding to concerns
- Ongoing privacy practices

All staff, volunteers, and council members must follow this policy.

Harmony United Church recognizes its current privacy risk level as **low**, but remains committed to completing appropriate due diligence and maintaining strong privacy practices.

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## 18. Questions and Complaints

Questions or concerns may be directed to:

**Privacy Officer**

Harmony United Church by emailing [harmonyunited.office@gmail.com](mailto:harmonyunited.office@gmail.com)

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## **19. Policy Review**

This policy will be reviewed every three years and updated as needed.