



CHURCH OF THE ROCK

Privacy Policy

Board Approval: May 27, 2014

Revised: May 23, 2017, November 25, 2020, May 31, 2023; June 9, 2026

1. Purpose

- 1.1. This Privacy Policy reflects Church of the Rock Inc.'s ("COTR") commitment to protect any personal information disclosed to COTR. It is designed to ensure that COTR maintains the confidentiality, accuracy, and security of such information. These principles guide COTR in the collection, use, retention, and disclosure of all personal data.

2. Definitions

- 2.1. What is personal information?
 - a. Personal information includes details such as name, address, telephone number, date of birth, and social insurance number.
 - b. It also encompasses credit card information, email addresses, fax numbers, and banking details.

3. Collection and Use of Personal Information

- 3.1. The information that is collected enables COTR to process and/or develop:
 - a. donation receipts;
 - b. child abuse registry checks;
 - c. police checks;
 - d. a database from which COTR maintains the volunteer program;
 - e. employee files;
 - f. communication; and
 - g. relationship building.
- 3.2. COTR will request permission and explain the reason for collecting personal information. In cases where the purpose is obvious, consent may be implied. Personal information will only be used for the purposes for which express consent has been obtained.

4. Disclosure of Personal Information

- 4.1. COTR does not provide or exchange personal information to other organizations without consent. Personal information is a vital part of COTR's ongoing relationship with Church attendees. Personal information will only be disclosed:
 - a. on a confidential basis, to obtain a child abuse registry check or a police check;
 - b. if the disclosure is required or permitted by law; or
 - c. if an individual requests or consents to the disclosure.



- 4.2. Consent for the use of personal information can be withdrawn at any time by providing reasonable notice to COTR through a written request to the Privacy Officer. The consequences of withdrawing consent will be explained. COTR may retain information for audit or archival purposes.

5. Maintaining and Safeguarding Personal Information

- 5.1. COTR strives to ensure that security measures protect personal information against unauthorised access, loss, deletion or alteration. This includes limiting access to those employees who have a signed Confidentiality Agreement. This also includes the use of individual sign-up procedures for program registration, which are stored in a secure location, prohibiting personal information from being displayed publicly.

6. Limiting Use, Disclosure and Mandatory Breach Reporting

- 6.1. We recognize our legal obligations to protect the personal information we collect. To safeguard this information, COTR has implemented measures—including agreements with outsourced service providers—to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction. These measures may include physical security controls, network security protocols, and organizational safeguards such as non-disclosure agreements and need-to-know access.
- 6.2. In the unfortunate event that the Church suffers a loss of personal information, or unauthorized access to or disclosure of personal information, the Church will notify any affected individuals as required by law and the Office of the Privacy Commissioner of Canada.

7. The Role of the Privacy Officer

- 7.1. COTR's Privacy Officer serves as the primary contact for any matters concerning the use of personal information. The Privacy Officer is responsible for monitoring information collection and data security, ensuring that staff receive appropriate training on privacy issues and their responsibilities under this policy. The Privacy Officer also handles all privacy inquiries and personal information access requests.
- 7.2. Ultimate responsibility for COTR's compliance with this Policy rests with the Senior Pastors, Senior Management Team and Directors of COTR.

8. Access Your Personal Information

- 8.1. Requests for access to personal information must be made in writing. COTR will respond within a reasonable time frame, typically within 14 days. There is no charge for such requests unless multiple copies of records are required; in such cases, COTR will notify the requester of any costs before copying the records. COTR may be unable to provide access if the information cannot be separated from the records of others, if disclosure would compromise security, or if the information is protected by legal privilege.

9. Questions and Concerns

- 9.1. COTR is committed to continuous improvement and values input. COTR strives to ensure that the information collected, used and disclosed is accurate and up to date. A Privacy Officer has

been appointed to ensure that all employees comply with the following 10 Principles for the Protection of Personal Information:

- a. **Accountability:** COTR is responsible for maintaining and protecting the personal information under its control. A Privacy Officer has been designated to ensure compliance with this policy and applicable privacy laws.
- b. **Identifying Purposes:** Before or at the time personal information is requested, the purposes for which it will be used or disclosed will be identified.
- c. **Consent:** A person's knowledge and consent are required for the collection, use, or disclosure of personal information. Consent may be express (explicitly given) or implied (inferred from the individual's actions, the nature of the information, or the circumstances).
- d. **Limiting Collection:** The collection of personal information is limited to what is necessary for the purposes identified.
- e. **Limiting Use, Disclosure and Retention:** Personal information will only be used or disclosed for the purposes for which consent has been given, or as required by law. Personal information will be retained only as long as necessary to fulfill these purposes.
- f. **Accuracy:** Personal information will be kept as accurate, complete, and up-to-date as necessary for the purposes for which it is used.
- g. **Safeguards:** Personal information will be protected with appropriate security measures, including physical, technological, and organizational safeguards.
- h. **Openness:** COTR will make information about its personal information management policies and practices readily available and easily understandable to individuals.
- i. **Individual Access:** When requested, access will be given to the existence, use and disclosure of a person's information. Individuals may challenge the accuracy and completeness of their information and have it amended as appropriate.
- j. **Challenging Compliance:** Individuals may challenge COTR's compliance with these principles. All complaints and inquiries will be addressed to the Privacy Officer, who will investigate and respond appropriately.

9.2. Complaints about Compliance

- a. Upon receiving the response from the Privacy Officer, the person who filed the complaint may, if they are not satisfied, appeal initially to the organization's Senior Management Team and then, secondly, to the COTR Board of Directors to review and determine the disposition of the complaint at issue.
- b. The determination of the COTR Board of Directors shall be final and the Privacy Officer shall abide by and implement any and all recommendations.

9.3. If an attendee would like to review their own personal information, correct or revise existing information, or if any questions, concerns or comments regarding this Privacy Policy or its application have been raised, please contact the Privacy Officer by email at: privacy@churchoftherock.ca or by mail at: COTR, 1397 Buffalo Place, Winnipeg, MB, R3T 1L6, Attention: Privacy Officer.