



Privacy Policy Compliance Manual

INTRODUCTION

Knox Presbyterian Church (“Knox Church” or the “Church”) is a Presbyterian church in downtown Toronto, Canada. Knox Church values the privacy of every individual’s personal information and is committed to the protection of personal information.

Knox Church has established a privacy regime that strives to:

- Promote an understanding and acceptance of privacy principles and their objectives throughout the Knox Church community;
- Educate the Knox Church community about information privacy; and
- Monitor privacy compliance and keep the Knox Church community informed of updates to procedures.

DEFINED TERMS

“Knox Church” or the **“Church”** means Knox Presbyterian Church (Toronto – Spadina).

“Church Participant” means any member or adherent of the Church, any donor to the Church, as well as any other person who has attended, attends, or will attend the Church or participate in any Church activity, program, event or conference.

“Church Personnel” means any employee, Pastor, Elder, Trustee, volunteer or any other person who has administrative dealings on behalf of the Church.

“General Personal Information” means publicly available information about an identifiable individual and includes, but is not limited to: name, address, telephone number, title.

“Private Personal Information” includes but is not limited to: email address, racial or ethnic origin, religious beliefs or affiliations, sexual preferences or practices, criminal background checks, credit card information, social insurance number, health card number and other health information, banking information, and any other sensitive personal information including birth, baptismal, marriage and death / burial records.

“Collector” means any Individual who receives Personal Information on behalf of the Church.

“Policy” means the Church Privacy Policy.

The Compliance Manual 10 Privacy Principles

The Knox Church Privacy Policy Compliance Manual is based on 10 Privacy Principles, referred to as the “fair information principles” in the Personal Information Protection and Electronic Documents Act (PIPEDA). PIPEDA is Canada’s private sector privacy law.

1. **Be accountable** – The Church is responsible for maintaining and protecting Individuals’ information under its control. In fulfilling this mandate, we have designated individuals who are accountable for compliance with this policy.
2. **Identify the purpose** – The purpose for which Individuals’ information is collected must be identified at or before the time the information is collected.
3. **Obtain informed consent** – Individual’s knowledge and consent are required for the collection, use or disclosure of their information, except where required or permitted by law.
4. **Limit collection** – Individual’s information collected is to be limited to those details necessary for the purposes identified by Knox Church, and the information is to be collected by fair and lawful means.
5. **Limit use, disclosure, and retention** – Individuals’ information may only be used or disclosed for the purpose for which it was collected or when it is required or permitted by law. Individuals’ information should only be retained for the period of time required to fulfil the purpose for which it was collected.
6. **Be accurate** – Individuals’ information must be maintained in an accurate, complete, and up-to-date form as necessary to fulfil the purposes for which it is to be used.
7. **Use appropriate safeguards** – Individuals’ information must be protected by security safeguards that are appropriate to the sensitivity of the information.
8. **Be open** – The Church will make specific information about its policies and practices relative to the management of Personal Information readily available to Individuals.
9. **Give individuals access** – Upon request, and within a reasonable period of time, Individuals will be informed of the existence, use, and disclosure of his or her Personal Information and shall be given access to that information except when required or permitted not to do so by law. Individuals are entitled to comment on the accuracy and completeness of his or her Personal Information and have that information amended or removed where appropriate.
10. **Provide recourse** – Individuals may direct questions or enquiries with respect to the privacy principles outlined above or about Church privacy practices by contacting our Privacy Officer.

Checklist for Compliance with Privacy Laws

This checklist should be reviewed by Church personnel prior to collecting any Personal Information for Church purposes.

- ☐ Have you been trained in privacy laws or attended a privacy briefing session?
- ☐ Have you considered the privacy implications of all new projects?
- ☐ Do you only collect Personal Information that is necessary for the Church's activities?
- ☐ When collecting Personal Information, do you make sure that individuals providing the information know: the purposes for collection; that they have the right to access their information; any laws that require collection; the types of organizations to which the Church discloses the information; the consequences of not providing the information; and the Privacy Officer's contact details?
- ☐ Do you only use and disclose Personal Information for the primary purpose of its collection or a secondary purpose the individual would reasonably expect? If it does not fall within the primary or secondary purpose do you obtain the consent of the individual?
- ☐ When disclosing Personal Information to third parties, do you request the third party to sign a privacy agreement which requires them to treat the information in accordance with the privacy laws?
- ☐ Do you make sure Personal Information is accurate, complete and up to date?
- ☐ Do you take reasonable steps to protect Personal Information from misuse, loss, unauthorized access, modification or disclosure?
- ☐ Do you provide individuals with the opportunity to access their Personal Information in accordance with the Church Privacy Policy?
- ☐ Do you know where to locate the Church Privacy Policy? Do you make it available to anyone who asks for it?

- ☐ Do you, wherever it is lawful and practicable, provide individuals with the option of remaining anonymous when dealing with the Church?
- ☐ When transferring information outside of Ontario, do you make sure that the recipient has equivalent privacy laws, the individual consents or you request the recipient to sign a privacy agreement?

Policies & Procedures

PAPER & ELECTRONIC DOCUMENT POLICY

This policy governs the security of both electronic and paper documents that contain General and Private Personal Information about Church Participants. Most information of a general nature is volunteered by Church Participants on sign-up sheets or through other informal ways. Most information of a private nature is volunteered by Church Participants on program registration forms online, on paper registration forms, or is communicated to Church personnel.

Personal information of a general nature includes certain publicly available information, such as the following information as published in telephone directories:

- Name
- Phone number
- Address

The ministries at the church that intake personal information of a general nature include:

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|--------------------------------|---------------------------------------|
| • Children's ministries | • Mildred Gehman Missionary Auxiliary |
| • Youth Ministries | • Knox Youth Dinner and Food Bank |
| • Camp registrations | • Library |
| • Pastoral Care | • ESL classes |
| ○ Prayer chain | • Facilities Rentals |
| ○ Benevolent | • Missions Hub |
| • Small Groups / Home Churches | • Knox World Missions |
| • Family Ministries | |

Personal information of a private nature includes:

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|---------------------------|---|
| • Name | • Health Card Number |
| • Address | • Other health-related information |
| • Email | • Other sensitive Personal Information (i.e. birth, baptismal, marriage and death/burial records) |
| • Phone number | • Driver's Licence |
| • Social Insurance Number | • Police Records checks |
| • Banking Information | |

The ministries and resources at Knox Church that require, or store personal information of a private nature include:

- Members and Adherents database
- Police Records checks
- Staff mailboxes (paper only)
- Communications
 - Stripe (electronic only)
 - Lucid Press (paper & electronic)
 - Basecamp (electronic only)
 - Breeze (electronic only)
 - Eventbrite (electronic only)
- Pastoral Care
 - Benevolent fund
 - Weddings
 - Counselling
 - Baptisms
 - Prayer Chain
- Website “Contact Us” (electronic only)
- Camp registrations (electronic only)
- Knox House
- Adopt-a-Student
- Donations
- Finance and Counting Teams
- Minutes from Ministry Teams
 - Trustees
 - Session
 - Building & Property Committee
 - Leading with Care
 - Family / Youth
- Human Resources
 - Employment
 - Payroll
 - Benefits
 - Pension
 - Bursaries
 - Personnel Ministry Team
- Events (on and off-site)
 - Retreats, events, conferences
 - Waivers
- Affiliated Organisations
 - Presbytery of East Toronto (“Presbytery”)
 - Presbyterian Church in Canada (“PCC”)

COLLECTION, USE, AND ACCESS PROCEDURES

Collection

- Only collect Personal Information if it is necessary for activities, programs and functions.
- Ensure consent is given when information is collected. Keep in mind the following requirements:
 - Individual must have the capacity to consent;
 - Consent must be voluntary;
 - Consent must be informed;
 - Consent must be specific; and

- Consent must be current.
- It is preferable to obtain written (i.e. click-box online) consent. In some circumstances, written consent is not practicable. Verbal or implied consent can be relied upon, however, if a dispute were to arise it would be more difficult to prove that the Church had obtained consent.
- Ensure online forms have a privacy policy visible that Individuals consent to by clicking a box and providing their Personal Information.

Use

- Ensure Personal Information about an Individual is used by the Church for the purpose for which it was collected or a related purpose (directly related to sensitive information) that the individual would reasonably expect.
- In the case of a large unauthorized such as the Church, just because an individual provides Personal Information for one purpose (ie. Home Church), does not mean that they expect or consent to their information being used for other Church purposes. This is particularly relevant in the case of sensitive information.

Storage

- The Church must take reasonable steps to protect Personal Information from misuse, loss, unauthorized access, unauthorized modification; and unauthorized disclosure.
- There are a number of things that Collectors can do to ensure compliance with this privacy principle which includes:
 - Lock offices when unattended;
 - Do not leave Personal Information lying around (especially in open plan offices);
 - Stagger lunch breaks to ensure someone is always present in the office; and
 - Store Individuals' Personal Information in locked Church facilities (ie. filing cabinets).
 - Change passwords on computers regularly;
 - Activate a screensaver on computing devices after 3-5 minutes of inactivity;
 - Install privacy screens on computers/laptops;
 - Ensure secure wireless connections in the Church;

- Encryption: Use Boxcryptor to encrypt anything stored locally, on Jot form or on the cloud (google drive);
- Prohibit the transfer of information via unsecured mobile devices (ie. USBs, etc.);
- Do not leave Personal Information lying around (especially in open-plan office areas);
- Stagger lunch breaks to ensure Church personnel is always present in the office; and,
- Store general and private Personal Information that has been printed off in locked facilities (ie. filing cabinets).

Access

- Access to general and private Personal Information must be controlled with appropriate access processes and limited to the least amount of Church personnel necessary;
- Security codes and keys to Church facilities must be reviewed every six (6) months and security codes and passwords should expire and be renewed periodically.
- If an Individual whose Personal Information is stored in the Church's facilities wants access to the information, they must request access from the privacy officer.

Retain/Delete

- Anything not required for Church records should be securely destroyed on all access points (email, cloud, locally) at the earliest possible opportunity. This may be the end of the day, week or month.
- If the information relates to taxation purposes it should be kept for seven (7) years.
- Any Information gathered should be securely destroyed after seven (7) years.

In certain circumstances, Individuals may provide Personal Information where there is no reasonable expectation of privacy (ie. Library, posted sign-up sheets, etc.). In these circumstances, the procedures regarding access, storage and retention/deletion may not apply.

Checklist for Electronic Security

- ☐ Promptly remove network access rights upon Church personnel departure, as well as periodic access reviews to ensure permissions are appropriate;
- ☐ Conduct annual network security tests, using external security consultants;
- ☐ Anti-virus software must be deployed, signatures regularly updated, and scanning activated for
 - ☐ desktop, laptop, workstation and server operating systems;
- ☐ Email filtering technology in place to effectively identify and block spyware and malware, including executable attachments and malicious emails and attachments;
- ☐ An Internet Web filter should be put in place to log user activities and perform web filtering and block Internet traffic to unapproved sites;
- ☐ Instituted complex passwords that expire periodically that are unique and not readily reusable;
- ☐ Servers, storage area network and other critical information technology systems should be, if
 - ☐ possible, housed in a room that is secure and inaccessible to unauthorised users;
- ☐ Remote access (i.e. by IT service providers) to all internal systems should require multi-factor authentication;
- ☐ All software, firmware and security updates must be installed in a timely fashion;
- ☐ Ensure that proper control systems and processes are in place to safeguard access to Church
 - ☐ applications, systems, networks and computing devices that may contain Personal Information;
- ☐ Ensure that all email communications between Church personnel that contain sensitive Personal Information are encrypted using a secure email system; and

- ☐ Third party service providers (i.e. credit card processing parties, IT service providers, etc.) must be assessed to ensure that they are capable of protecting all information entrusted to them at a level that meets or exceeds the requirements of the Church.

CONCLUSION

The above policies and procedures are meant to promote an understanding and acceptance of the privacy principles and their objectives throughout the Knox Church community, educate people within the Knox Church about information privacy and monitor privacy compliance and keep Knox Church informed of updates to procedures.

If a Church Participant, Church Personnel or member of the public has any privacy issues that he or she would like considered by the Church, the person may contact the Privacy Officer. The Privacy Officer will undertake a preliminary investigation of the issue and report back to the person who raised the issue, his or her view of whether there has been a breach of this policy or one or more of the Information Privacy Principles. The Privacy Officer will also indicate what action, if any, the Church will take to rectify the situation.

Privacy Officer:

Christopher Mudiappahpillai, Executive Director
Knox Presbyterian Church Toronto
630 Spadina Avenue, Toronto, ON M5S 2H4
(416) 921-8993

Attached Resources:

Schedule A: Knox Presbyterian Church Privacy Policy and website Terms and Conditions

Schedule B: Knox Presbyterian Employee Privacy Policy

SCHEDULE A

Privacy Policy and Website Terms and Conditions

KNOX PRESBYTERIAN CHURCH PRIVACY POLICY

Welcome to Knox Presbyterian Church (the “Church”). Please read this Privacy Policy carefully before submitting any Personal Information to the Church or to the Church’s website. When you interact with the Church (for example, when you participate in Church activities, when you register for programs, conferences or events, when you wish to obtain goods or services from the Church, or when you complete other forms provided by the Church) and / or access, browse or use the Church website, you are signifying your consent to be bound by this Privacy Policy.

1. Introduction

We believe that when you visit the Church, your Personal Information deserves protection. The term “Personal Information” in this Privacy Policy refers to any information about an identifiable individual, including but not limited to name, email, date of birth, date of baptism, marriage, death and / or burial records, and limited banking and health information. Relevant privacy legislation excludes from “Personal Information” publicly available information such as names, address and telephone numbers published in telephone directories. This Privacy Policy has been prepared to help you understand our commitment to the privacy of your Personal Information, and to let you know what we can, and cannot do, with your Personal Information.

Knox is part of the Presbyterian Church in Canada, a national denomination comprised of approximately 600 Presbyterian Churches. As part of the Presbyterian Church in Canada, we may periodically share records that include Personal Information with two (2) related but separate entities: the Presbytery of East Toronto (“Presbytery”) and the Presbyterian Church in Canada (“PCC”). Both are separate entities from the Church.

At all times, it is your decision as to whether you wish to provide the Church with information about yourself.

2. Collection of Personal Information

You may visit the Church and the Church’s website without directly providing any Personal Information. However, to interact with the Church and to access particular portions of the Church’s website, you may need to provide Personal Information including, but not limited to, your email, username and password. All information you provide is collected privately by the Church.

3. Use of Personal Information by the Church

Your Personal Information is used by the Church to:

- a) Establish and maintain your involvement with the Church, including providing you with newsletters and other communications;
- b) Provide the products or services you have requested from the Church;
- c) Answer any of your inquiries;
- d) Register you for activities, events, or conferences; and
- e) Meet statutory and regulatory requirements.

Personal Information that is shared with the Presbytery includes records related to your date of birth, baptism, marriage, death and / or burial. To help ensure the Church maintains proper records, the Presbytery periodically reviews (either annually or every other year) Knox Session minutes, baptismal registers, our roll of professing members, and our marriage register. The Presbytery reviews and attests these records but does not retain any of the records or Personal Information after its review.

The PCC receives information from the Church for archival purposes. As such, Personal Information may be archived with the PCC including baptismal registers, marriage registers, lists of members, communion rolls, minutes from meetings of the Session, Trustees, congregation and/or other leadership bodies, annual reports, and/or other records.

In certain instances, such as when you make a donation to the Church or when you provide us with feedback, we may require that you provide specific Personal Information. The Church may use Personal Information and data collected to generate aggregate statistics and reports for internal use. The Church may also use Personal Information and data collected to generate aggregate data or other information reported in returns or other filings made with third parties to comply with statutory or regulatory reporting requirements. These statistics, reports, returns and other filings do not contain information that would identify individuals or individual users of the Church's website except as required by statute or regulation in which case individual's written permission is obtained in advance.

The Church may run online promotions in relation to Church activities that require submission of personally identifiable information by participants. The Church may use the information collected in the aggregate so we can determine, for example, how many visitors to our website participated in the promoted Church activity.

Your individual information will also enable us, if necessary, to notify you of any change to our policies.

4. Protection of Personal Information by the Church

When you visit the Church's website and provide Personal Information, the information is processed and stored on both internal and cloud-based secure servers. Upon your departure from the Church, or at the conclusion of specific Church activities, your Personal Information will be securely deleted from Church's database within three (3) months after notifying the Church in writing that you want relevant Personal Information to be removed from the Church's database.

5. Disclosure of Personal Information

Users' non-aggregated specific Personal Information will not be sold, rented or made available to anyone other than the Church without express permission to do so.

The Church reserves the right to co-operate with law enforcement and other officials in any investigation requiring either personal or account information, including any information provided through Church activities, or online through the Church's website, or reports about

lawful or unlawful user activities in relation to Church activities and the Church's website. The Church also reserves the right at any time to disclose any personal and account information: (i) to comply with any applicable law or regulation; (ii) if such disclosure is necessary or appropriate to site operation; or (iii) to protect the rights or property of the Church and its users, partners, providers, licensors or merchants.

Any Personal Information disclosed to the Presbytery for review and attestation will not be kept on file, disclosed or made available to anyone else.

Any Personal Information disclosed to PCC for archival purposes will only be accessed / disclosed according to their privacy policy. The PCC has specific restrictions limiting access to records that hold Personal Information less than between 50 and 100 years old. For example, baptismal records less than 100 years old are restricted, marriage and death and / or burial records less than 75 years old are restricted, and personal information files are restricted for the most recent 75 years.

More information on Presbytery and PCC privacy policies will be provided upon request.

6. Consent

By participating in Church activities and / or accessing the Church's website, you consent to the collection and use of personal and account information by the Church, in accordance with this Privacy Policy, including the sharing of some Personal Information with the Presbytery and the PCC.

7. Questions of Comments

The Church welcomes your feedback regarding the Church's website and this Privacy Policy. Please contact us by e-mail at privacyofficer@knoxtoronto.org or by phone 416-921-8993.

TERMS AND CONDITIONS

Welcome to the Church. PLEASE READ THESE TERMS AND CONDITIONS CAREFULLY BEFORE PARTICIPATING IN CHURCH ACTIVITIES OR ACCESSING OR USING THIS WEBSITE. By participating in Church Activities and / or accessing, browsing and using this website, you are signifying your consent to be bound by these Legal Terms and Conditions (the “Terms and Conditions”).

1. Restrictions on Use of Materials

All content included on Church activities materials and this website, such as text, graphics, logos, button icons, images, audio and video clips, and software, is owned by and is the property of the Church or other parties that have licensed their materials to the Church, and is protected by Canadian and United States copyright laws. Unless otherwise stated, no material from Church activities materials and this website (or any website owned, operated, licensed or controlled by the Church or its affiliates, subsidiaries, successors and assigns), may be copied, reproduced, republished, uploaded, posted, transmitted, framed, commercially exploited or distributed in any way or by any means whatsoever.

Modification of the materials or use of the materials for any other purpose (including the use of any such material on any other website or networked computer environment) is a violation of copyright and other proprietary rights. You agree to abide by all copyright notices, information and restrictions contained in any content on Church activities materials and this website and any content accessed through this website.

Any unauthorized use or violation of these terms immediately and automatically terminates your right to engage in Church activities and use of the website and may subject you to legal liability.

The Church’s logos, images, product and company names displayed or referred to on Church activities materials and the Church website are trademarks of the Church. Other trademarks or names mentioned herein may be the trademarks or trade names of their respective owners.

2. Disclaimer and Limitation of Liability

By using the Church’s website, you assume all risks associated with the use of the website, including any risk to your computer, software or data being damaged by any virus, software, or any other file that might be transmitted or activated via a Church website or your access to it. The Church shall not be liable for any damages of any kind (general, special, incidental or consequential damages, including, without limitation, lost revenues or lost profits) resulting from the use or misuse of the information contained in the Church’s website.

The Church’s website is controlled and operated at offices in Toronto, Ontario. The Church makes no representation that materials on the website are appropriate or available for use in other locations. If you choose to access this website from other locations, you do so on your

own initiative and you are responsible for compliance with local laws, if and to the extent local laws are applicable.

Reference herein to any specific commercial product, process, or Church activity by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply endorsement, recommendation, or favouring by the Church. The views and opinions of authors expressed herein do not necessarily state or reflect those of the Church, and shall not be used for advertising or product endorsement purposes.

3. Jurisdiction and Severability

You agree and acknowledge that your use of this website shall be deemed to have occurred and taken place solely in the Province of Ontario, Canada. You further agree and acknowledge that these Terms and Conditions, and any disputes in connection with your use of this website or its contents, will be governed by the laws of the Province of Ontario, Canada, and the laws of Canada applicable therein. You expressly consent to the exclusive forum, jurisdiction, and venue of the courts of Ontario in any and all actions, disputes, or controversies relating hereto. If any provision of these Terms and Conditions shall be found to be unlawful, void and unenforceable, then such provision shall be deemed severable herefrom and will not affect the validity and enforceability of any remaining provisions.

4. Amendments

The Church reserves the right to make changes to the website and to modify, alter or otherwise update these Terms and Conditions at any time with or without notice. You should review the website on a regular basis for any such changes. Your continued use of the website shall constitute your acceptance of any revisions to the Terms and Conditions.

5. Language

The parties have requested that these Terms and Conditions and all documents contemplated hereby be drawn up in English. Les parties aux présentes ont exigé que cette entente et tous autres documents envisagés par les présentes soient rédigés en anglais.

6. Indemnification

To the maximum extent permitted by applicable law, you will defend, indemnify and hold the Church, its affiliates and related companies, and any of their respective directors, officers, employees, consultants and agents, harmless from and against all claims, liability, and expenses, including all legal fees and costs, arising out of (i) your breach of any provision of these Terms and Conditions, or (ii) your use of the website and the contents contained on the website.

The Church reserves the right, in its sole discretion and at its own expense, to assume the exclusive defence and control of any action, claim or matter otherwise subject to indemnification by you. You will co-operate as fully as reasonably required in the defence of any claim.

7. User Privacy Policy

Use of this website is subject to the terms of our Privacy Policy. You recognize and agree that: (i) the Internet is not a secure medium, and neither the privacy of your communications, nor visits to this website, can be guaranteed; (ii) the nature of Internet communications means that your communications may be susceptible to data corruption, unauthorized access, interception and delays; (iii) the website may include incomplete information, inaccuracies or typographical errors; (iv) the Church and any other persons involved in the management of the website may make changes in the information and content included in the website at any time without notice; (v) the Church shall not be responsible for any detrimental reliance you may place on the website or its contents; and (vi) use of the website is on an “as is” basis and is strictly at your own risk.

SCHEDULE B

Knox Church Employee Privacy Policy

KNOX PRESBYTERIAN EMPLOYEE PRIVACY POLICY

Welcome to Knox Presbyterian Church. We believe that the Personal Information of Church employees deserves protection. This Privacy Policy has been prepared to help you understand our commitment to the privacy of your Personal Information, and to let you know what we can, and cannot do, with your Personal Information.

1. The Application of This Policy

At Knox Presbyterian Church (“Knox” or the “Employer”), we are committed to safeguarding the privacy of the Personal Information that we gather concerning our prospective, current and former employees (the “Employee(s)”) for management, Church services, human resources, payroll and benefits purposes. This Privacy Policy for Employees (the “Policy”) applies to Employees’ Personal Information and to the management of that Personal Information in any form, whether oral, electronic or written.

2. Personal Information

The term “Personal Information” in this Policy refers to information that does identify or is capable of identifying the Employee. The types of Personal Information that we gather and process include:

name, gender, home address and telephone number, date of birth, marital status, emergency contacts;

residency and work permit status, military status, nationality and passport information;

social insurance or other taxpayer identification number, banking details;

sick pay, pensions, insurance and other benefits information (including the gender, age,

nationality and passport information for any spouse, minor children or other eligible dependants and beneficiaries);

date of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended;

height, weight, photograph, physical limitations and special needs;

records of work absences, vacation entitlement and requests, salary history and

expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing Knox's policies);

where permitted by law and proportionate in view of the function to be carried out by the Employee or prospective Employee, the results of credit and criminal background checks, screening, health certifications, driving licence number, vehicle registration and driving history;

information required to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g. child support and debt payment information);

acknowledgements regarding Employer policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies;

information captured on security systems, including surveillance and key card entry systems;

voicemails, e-mails, correspondence and other work product and communications created, stored or transmitted by an Employee using the Employer's computer or communications equipment; and

date of resignation or termination, the reason for resignation or termination, information relating to administering termination of employment (e.g. references).

Most of the Personal Information we process is information that Employees knowingly provide to us. However, in some instances, we process Personal Information that we are able to infer based on other information provided to us or from our interactions with the Employee, or Personal Information that we receive from a third party with the Employee's knowledge.

3. How We Use Personal Information

We use Personal Information concerning our Employees in order to:

- Evaluate applications for employment;
- Manage all aspects of an Employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource related processes;
- Develop human resources and succession plans;
- Maintain absence records and occupational health programs;

- Protect the safety and security of staff, visitors and property (including controlling and facilitating access to and monitoring activity in secured premises and activity using Employer computers, communications and other resources);
- Investigate and respond to claims against Employer;
- Conduct Employee opinion surveys and administer Employee recognition programs;
- Administer termination of employment and provide and maintain references;
- Maintain emergency contact and beneficiary details (which involves Knox holding information required to contact the Employee's designated emergency contact person); and
- Comply with applicable laws (e.g., safety and health), including a court or administrative orders regarding individual employees (e.g., garnishments, child support payments).

We reserve the right to install and use surveillance cameras within and around our workplace and premises, which as installed are used for the following purposes:

- To prevent and detect crime;
- To protect the safety and health of Employer staff and visitors;
- To manage and protect Employer's property and the property of Employer's staff and visitors;
- For quality assurance purposes.

4. Disclosure of Employee's Personal Information

In order to carry out the purposes outlined above, Employee information will be disclosed to human resources staff, managers, consultants, advisers and other appropriate Knox Employees. Like many organizations, from time to time, we outsource the processing of certain functions and/or information to third parties. When we do outsource the processing of Personal Information to third parties or provide Personal Information to third party service providers, we oblige those third parties to protect Personal Information with appropriate security measures and prohibit them from using Personal Information for their own purposes or from disclosing Personal Information to others. We reserve the right to disclose any Personal Information we have concerning an Employee if we are compelled to do so by a court of law or requested to do so by a governmental entity, or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property. We also reserve the right to retain information collected and to process such information to comply with accounting and tax rules and regulations.

5. Accessing Your Personal Information

With some limited exceptions, Employees may inquire about the Personal Information Knox maintains about by sending us a written request by letter or e-mail to privacyofficer@knoxtoronto.org. Please be sure to include your full name, current (or last) job title and area of employment at Knox so we can ascertain the identity and the relevant Personal Information we maintain. We may not disclose data that an Employee is not entitled to receive under applicable laws (e.g. data revealing information about another individual). We reserve the right to charge a fee, if permitted under applicable law, which is usually approximately \$25, for processing any such request. Where an Employee makes more than one request in quick succession, Knox may respond to any subsequent request by referring to the earlier response and only identifying any items that have changed materially.

Any questions about this Policy, any concerns or complaints with regard to the administration of the Policy, and any requests for access to the Personal Information maintained by Knox may be directed to privacyofficer@knoxtoronto.org.