

POLICY TYPE: SAFETY & SECURITY

POLICY TITLE: PRIVACY POLICY

Last Updated: October 2019; December 2022.

Scope

Canadian Lutheran World Relief (“CLWR”) is committed to protecting employee personal information which CLWR collects and holds. This Policy outlines the way that CLWR collects, uses, retains, safeguards, discloses and disposes of your personal information.

CLWR will adhere to all relevant federal and provincial legislative privacy requirements. CLWR will strive to meet or exceed the privacy standards established by Canada’s Personal Information Protection and Electronic Documents Act (the “Act”, PIPEDA) and will ensure that it remains current with changing technologies and laws.

CLWR’s Privacy Policy is based on the following principles:

Accountability

CLWR is responsible for maintaining and protecting employees personal information under its control. In this regard, CLWR has appointed a staff person (the “Privacy Officer”) whose responsibilities include implementation and monitoring of CLWR’s Privacy Policy (the “Privacy Policy”). The Privacy Officer is also responsible for CLWR’s compliance with privacy principles and responding to inquiries and access requests in accordance with this Policy. The Privacy Officer may at their discretion enlist assistance from other staff and/or volunteers within the organization.

CLWR has implemented internal policies which facilitate adherence to the Privacy Policy including but not limited to the following:

- Security measures at all levels designed to protect personal information in its possession; and
- Implementing procedures designed to respond to complaints and/or inquiries.

Identifying Purposes

Personal information includes any information that could specifically identify employees. At CLWR, personal information is generally collected, used and/or disclosed for processing donations, distributing publications, resource information, resource production and administrative purposes. CLWR only collects personal information that is reasonably necessary to fulfill these purposes. This type of information would include but is not limited to employee names, address, contact information and credit card information (for donation and retail purposes only).

Personal information may be collected, used or disclosed for any of the purposes set out above.

CLWR will not otherwise collect, use or disclose personal information without obtaining consent, unless required or authorized by law.

Consent

By providing personal information to CLWR, employees are deemed to consent to the collection, use and disclosure of the information for the purposes identified in this Privacy Policy. Consent may be withdrawn at any time by providing written notice to CLWR. However, withdrawal of consent, will disallow sending information about CLWR.

Limiting Collection

All personal information shall be collected fairly and lawfully. Wherever possible, CLWR collects personal information directly from its employees. CLWR does not and will not use any form of deception in gaining an employee's personal information.

CLWR does not indiscriminately collect information. The amount and type of information collected is limited to that which is required to fulfill our identified purposes. CLWR is responsible for employee personal information that is under its control. Personal information will be kept in accordance with prudent business practices and protected in accordance with the Safeguards described in this Privacy Policy.

Limiting Use, Disclosure and Retention

CLWR limits the use of personal information to the purposes identified in this Privacy Policy.

CLWR shall maintain documents and disclose them as necessary. More specifically:

CLWR may disclose a donor's name by publishing the name and donation amount online at www.clwr.org or in CLWR's Partnership Newsletter, though generally individual names are not published with corresponding donation amounts.

CLWR may disclose personal information to affiliated organizations: the Evangelical Lutheran Church in Canada (ELCIC) and the Lutheran Church–Canada (LCC).

CLWR may disclose personal information where CLWR has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.

At any time that CLWR is required to disclose personal information, it will disclose only as much information as is required to meet the purpose of the disclosure.

CLWR will retain personal information only if it is needed to effectively serve the purposes set out in this Privacy Policy and for a reasonable length of time thereafter. CLWR will always respect legislated retention periods either federally or provincially.

Accuracy

CLWR strives to ensure, to the extent it can, that personal information is accurate and up to date.

Please contact CLWR to advise of any changes to personal information.

Safeguards

Employees have the option to communicate with or donate to CLWR in a variety of ways, including through its web site and through email correspondence. While CLWR has taken all reasonable steps to ensure secure data transmission over the Internet, it cannot guarantee security. As a result, CLWR does not represent, warrant or guarantee the security of any personal information transmitted to it through the web site, or that the personal information will be protected against disclosure, misuse or alteration. CLWR does not accept any liability for personal information submitted until that personal information is received by CLWR. However, once received, appropriate safeguards are used to ensure the protection of the personal information submitted through the web site or emails consistent with this Privacy Policy.

Security safeguards have been implemented to ensure personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof. The following are some of the steps CLWR has taken to protect personal information:

1. Ensuring the premises where personal information is physically stored is secure;
2. Access to personal CLWR employee information is restricted to employees on a need to know or need to use basis; and
3. Implementing passwords and other security policies.

CLWR's Policy

CLWR is required to make information, concerning the policies and practices that apply to the management of personal information available to employees. This information is readily available through the website at www.clwr.org or by contacting CLWR's Privacy Officer.

Access to Personal Information

Employees are entitled to access personal information collected, used and/or disclosed by CLWR. CLWR will provide access to personal information within 45 days upon written request. Employees also have rights to know which third parties may have received personal information from CLWR.

When a request is made, CLWR will disclose whether it holds personal information. CLWR shall also disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

CLWR will correct any inaccurate information that is brought to its attention as soon as reasonably possible, and any pertinent third parties shall be apprised of the corrections in due course.

Inquiries

Should employees have any questions, inquiries or a complaint related to CLWR's Privacy Policy or any of its personal information management practices, please contact the Privacy Officer. If a complaint is justified, CLWR will take the steps necessary to resolve the issue, including amending policies and practices to allow for compliance in the future.

Canadian Lutheran World Relief
400 – 185 Carlton Street
Winnipeg MB R3C 3J1

Lisa Breton Kletke, Privacy Officer

Phone: (204) 631-0507

Email: lisa@clwr.org

Internet: www.clwr.org

If an employee is not satisfied with CLWR's response, they may file a formal complaint with the Privacy Commissioner in their province or the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner
30 Victoria Street
Gatineau, Quebec K1A 1H3
1-800-282-1376