



*The Roman Catholic Episcopal Corporation of the Diocese of Hamilton in Ontario
Communication 001*

Privacy Policy

1.0 Introduction

The Roman Catholic Episcopal Corporation of the Diocese of Hamilton in Ontario (Diocese) knows how important your privacy is to you. This Privacy Policy applies to all programs and operating divisions of the Diocese and sets out our practices regarding the use, collection and disclosure of personal information in connection with the services we provide.

The Privacy Policy applies to all individuals (lay or ordained, paid or unpaid) that the Diocese engages, interacts with, or provides services to, who are employees, staff members, volunteers, donors, or subscribers, of the Diocese. This Privacy Policy does not replace, but supplements, any internal policies that the Diocese may have or revise from time to time, which may address privacy of individuals, including Com-002, Technology Resources Policy, Com-003, Social Media Policy, Volunteer Screening Manual, as well as the Employee Policy Manual, which may include relevant information regarding employees' privacy.

This Privacy Policy may be updated from time to time at which point the Diocese will give reasonable notice that this Policy has been updated by posting such updates on the Diocesan website at <http://hamiltondiocese.com>. Please check our website periodically to see the current Privacy Policy.

For the purposes of this Privacy Policy, “personal information” refers to any information about an identifiable individual, other than the person’s business title or business contact information when used or disclosed for the purpose of business communications.

Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual). Information will be about an identifiable individual where there is a serious possibility that an individual could be identified through the use of that information, alone or in combination with other information.

2.0 Collection of Personal Information

The personal information the Diocese may collect from you includes:

- Contact information, such as your name, address, telephone number and email address.



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- Social insurance numbers
- Credit card or banking information may be collected where necessary.
- Photographs and videos.
- Video security footage may be collected for security purposes.
- Police Record Checks may be required in certain circumstances.
- Age, gender, marital status and religious denomination may be collected as needed.

3.0 Use of Personal Information

The Diocese uses personal information from you in the following ways:

- To maintain contact lists and attendance records, and to register for programs, workshops, and events.
- Tracking the personal information of donors.
- To contact you for various programs and fundraising campaigns.
- To communicate with you, provide updates and information, and distribute policies and programs.
- To issue tax receipts and to process donations, invoices and payroll.
- To issue marriage or baptism certificates.
- To assist those who wish to present a petition seeking a declaration of nullity for a previous marriage.
- To process the applications of employees and volunteers, to assess their suitability and eligibility, and to contact those individuals.
- Photographs and videos may be collected and used in print or electronically, including on the Diocese's website and social media pages, for the purpose of promoting the Diocese programs, workshops and events.
- Personal information will be gathered by the Catholic Cemeteries of the Diocese of Hamilton in order to assist families identify their needs, make decisions, and offer and carry out services they require.



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We may collect and use personal information from you for additional reasonable purposes that are identified at or before the time of collection and use, in the Diocese's internal policies, through changes to this Privacy Policy, or as may be permitted or required by law. When you provide us with your personal information we assume you consent to our collection and use of it. You may choose to not share your personal information with the Diocese but your involvement in Diocese activities and the Diocese community may be limited if personal information is not shared.

If at one time you provided your personal information you may wish to have your personal information removed by contacting the **Chief Privacy Compliance Officer** whose contact information can be found at the bottom of this Privacy Policy.

4.0 Disclosure of Personal Information

The Diocese will not disclose your personal information without your knowledge and consent to any third party, except as set out in this Privacy Policy, in the Diocese's internal policies, as described at the time of collection, as may be required or permitted by law, or for purposes that a reasonable person would consider appropriate in the circumstances. The Diocese may share your personal information in the following ways:

- Personal information shared with any operating division of the Diocese may be shared with all other operating divisions of the Diocese.
- Marriage licenses are sent to the provincial government.
- Personal information is shared as necessary for Diocese related events, and mission trips.
- Personal information is shared as necessary with auditors for the Diocese's annual audit.
- Personal information may be shared with third-party service providers, vendors or agents who provide services to, or on behalf of, the Diocese including hosting, data management and storage services, benefits providers, payroll providers, legal counsel and insurance providers.
- Personal information may also be shared with other organizations or ministries related to the Parish or other offices or operating divisions of the Diocese that are essential in furthering the work of the Diocese. Sharing your personal information in these circumstances will only be done for the limited purpose of achieving the mission of the Diocese through those other organizations or ministries.



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Either the Diocese or third party service providers may use servers or storage for such purposes which are located outside of Canada. The personal information stored outside of Canada may be subject to access requests from governments or law enforcement in those jurisdictions according to laws in those jurisdictions.

5.0 Storage, Processing and Security of Personal Information

We use a variety of secure means to store your personal information. These include:

- A secure server to store personal information.
- Locked cabinets in secure areas to store hard copies of records.
- Technological security measures, including passwords and encryption to prevent unauthorized access to financial and other personal information stored on computer systems.

The finance department, communications office, and applicable staff and volunteers of the Diocese have access to personal information. For example, volunteers in leadership positions may have access to registrations forms that are submitted for their programs. Personal information is only accessed when it is necessary for the purposes identified by the Diocese.

6.0 Analytics

We make use of Google Analytics to monitor and analyze the use of our websites. You can opt out from the use of Google Analytics by downloading and installing the [Google Analytics Opt-out Browser Add On](#). Google's Privacy Policy is available here: <https://policies.google.com/privacy>

7.0 The Model Code for the Protection of Personal Information

The Diocese applies the ten principles of the Model Code for the Protection of Personal Information which is incorporated into the legislation, when collecting, using, or disclosing your personal information.



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7.1 Accountability

The Diocese is responsible for the personal information collected and maintained by it and which is under its control. In order to fulfill this responsibility we have designated a Chief Privacy Compliance Officer whose contact information is available at the bottom of this page, to be responsible for the day-to-day care and control of personal information.

7.2 Identifying Purposes

We require the consent of individuals prior to using their personal information for any purpose other than that for which it was originally collected or stated within this Privacy Policy, the internal policies of the Diocese, as required or permitted by law, or for purposes that a reasonable person would consider appropriate in the circumstances. Similarly, if any individuals wish to be advised of the personal information we have related to them, they can contact us at the address set out below.

7.3 Consent

We are dedicated to obtaining the informed consent of individuals who provide us with their personal information. To this end, all our employees, personnel, or agents are instructed to provide information about how personal information is used to all interested individuals who inquire, as well as to obtain the informed consent of those who provide their personal information. We may periodically request written confirmation from you to ensure that the personal information collected and maintained by us is up-to-date and accurate. We may also ensure that we have your continuing consent to use and retain your personal information.

7.4 Limiting Collection

The Diocese restricts the collection of personal information only to that information that is necessary for the limited purposes that it was collected for.

7.5 Limiting Use, Disclosure, and Retention

We retain personal information only for as long as it is needed in the reasonable opinion of the Diocese or for as long as legally required. Once personal information is no longer needed, hard copies are shredded and disposed of, and digital information is erased. When disposing of or destroying personal information which is no longer needed, the Diocese ensures the appropriate measures are taken regarding the disposal or destruction so as to prevent unauthorized parties from gaining access to the information.



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7.6 Accuracy

The Diocese is committed to maintaining accurate, complete, and up-to-date personal information. If there are changes to the personal information you have given to us, simply inform us of the changes and we will update our records accordingly.

7.7 Safeguards

The Diocese has developed and implemented security safeguards appropriate to the sensitivity of the personal information kept by us. We also ensure that any of our employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

For example, if the Diocese receives an inquiry or a request from a third party to release the personal information of an individual, contact Pamela Aleman, the Communications and Public Relations Manager. The Communications Office has a protocol in place to deal with these inquiries and will do so in compliance with this Privacy Policy and applicable privacy legislation.

7.8 Openness

The Diocese makes information about its policies and practices respecting the collection and maintenance of personal information available to all interested parties. We are pleased to answer any questions that you may have regarding the collection and maintenance of personal information.

7.9 Individual Access

You can request access to your personal information held by us. However, we reserve the right to confirm the identity of the person seeking access to personal information before complying with any access requests.

7.10 Challenging Compliance

The Diocese has designated an official who is responsible for the day-to-day care and control of personal information. This official will receive and respond to all information requests regarding our privacy policies or about your personal information under our care and control. We investigate all complaints received by us and will respond in writing in a timely manner. If any complaint is found to be justified, then we will take appropriate measures to resolve the matter.



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8.0 Additional Information

If you would like more information about our policies, or if you would like to access or correct the personal information we have about you in our records, then please contact our Chief Privacy Compliance Officer by email or in writing, as provided below:

Attention: Jim Long, Chief Privacy Compliance Officer
905-528-7988 Ext. 2260
Diocese of Hamilton
700 King Street West
Hamilton, Ontario L8P 1C7
jlong@hamiltondiocese.com

9.0 Revisions

The Diocese may amend, depart from, or disregard this Policy, or any part of it, at any time for any reason. Any amendment to this policy will be effective at the date of the amendment. The Diocese will give reasonable notice that this Policy has been updated by posting such updates on the Diocesan website at <http://hamiltondiocese.com>.