



Beit Rayim Synagogue & School
9711 Bayview Ave. Richmond Hill, On L4C 9X7
905.770.7639 ext. 31 Fax: 905.770.5635
admin@beitrayim.org
www.beitrayim.org

BEIT RAYIM SYNAGOGUE AND SCHOOL

PIPEDA POLICY
(Canada's Personal Information Protection and Electronic Documents Act)

TABLE OF CONTENTS

	Page
INTRODUCTION	3
THE PRINCIPLES & GUIDELINES	4
THE POLICY TO PROTECT PERSONAL INFORMATION AT BEIT RAYIM	6
COMPLIANCE PRACTICES	12

PROTECTING PERSONAL INFORMATION AT BEIT RAYIM

INTRODUCTION

On January 1, 2004, Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) came into effect.

Beit Rayim Synagogue and School (hereinafter, referred to as "Beit Rayim") have developed a privacy policy and procedure for the protection of personal information.

Beit Rayim is a not for profit religious organization. Beit Rayim collects and used personal information to create membership lists, to send synagogue publications, newsletters, and bulletins, to inform members about the life of the synagogue, to communicate with committee and board members and volunteers, to register participants for synagogue and for synagogue-related events. A privacy policy has been adopted based on common sense and good judgment respecting our members. If you do not want your name or information to be made available, please contact the synagogue and school office. A copy of the synagogue's privacy policy will be available on the website shortly and is available at the office.

The Beit Rayim privacy information policy is a formal statement of principles and guideline for the protection of Beit Rayim personal information collected and provided by Beit Rayim members and employees. The objective of the policy is to ensure the personal information provided is collected, used and protected appropriately.

THE PRINCIPLES & GUIDLINES

The policy is based on the following ten PIPEDA principles and guidelines;

- 1. Accountability:** Beit Rayim is responsible for maintaining and protecting all personal information under its control. A Privacy Officer has been designated who is accountable for compliance with the ten principles that comprise the Beit Rayim policy.
- 2. Identifying purposes:** When Beit Rayim asks for a member's personal information, the purpose for which it is being collected will be identified. The information is used to inform the member about the life of the synagogue, maintain his or her subscription to synagogue mailings, publications, register the member for synagogue events and compile statistical and historical information about Beit Rayim. A member's personal information is not shared with third parties without the member's consent.
- 3. Consent:** Beit Rayim requires the member's knowledge and consent for the collection, use or disclosure of the members personal information, except where it is required or permitted by law.
- 4. Limiting Collection:** Beit Rayim collects information by fair and lawful means and limits collection to those details necessary for identified purposes. The personal information collected is usually limited to name, title, gender, religion, address, telephone number, email address and congregational or committee membership.
- 5. Limiting use, disclosure and retention:** Beit Rayim uses a member's personal information only for the purpose for which it was collected unless the member's consent is sought to do otherwise. Personal information is retained indefinitely for archival purposes unless the member requests to have it deleted.
- 6. Accuracy:** Beit Rayim endeavors to ensure that the information collected and used is accurate, up to date and as complete as possible. However, individuals are relied upon to inform the synagogue of changes to his or her personal information. A member may request access to his or her personal information and if applicable, request that the synagogue make corrections or changes to that file information.
- 7. Safeguarding information:** Beit Rayim applies appropriate safeguards to our computer networks and physical files and access to personal information about a member is restricted to Beit Rayim employees, board and/or committee members who need to use the information for identified and sanctioned purposes of the synagogue.

8. **Openness:** Beit Rayim makes information available to a member concerning the practices that apply to the protection of personal information.
9. **Individual access:** At a member's request, he or she will be informed of the existence, use and disclosure of his or her information and be given access to it. The member may verify the accuracy and completeness of his or her information, and may request that it be amended or deleted.
10. **Challenging compliance:** Beit Rayim Privacy Officer will answer any questions or enquiries a member has about the Beit Rayim policies or practices.

THE POLICY TO PROTECT PERSONAL INFORMATION AT BEIT RAYIM:

Accountability

- 1.1 A Beit Rayim Executive Board Member, as he or she may be from time to time is hereby appointed as the personal information compliance officer (the "officer") of Beit Rayim.
- 1.2 All persons, whether employees, volunteers or board or committee members who collect, process or use personal information shall be accountable for such information to the officer.
- 1.3 This policy shall be made available upon request.
- 1.4 Any personal information transferred to a third party for processing is subject to this policy. The officer shall use contractual or other appropriate means to protect personal information at a level comparable to this policy while a third party is processing this information.
- 1.5 Personal information to be collected, retained or used by Beit Rayim shall be done so only after the officer gives written approval. This information shall be secured according the officer's instructions.
- 1.6 Any person who believes Beit Rayim uses personal information collected, retained or used for purposes other than those the person explicitly approved may contact the officer to register a complaint or make a related inquiry.
- 1.7 Upon receiving a complaint from any person regarding the collection, retention or use of personal information, the officer shall promptly investigate the complaint and notify the person who complained about his/her findings and corrective action be taken, if any.
- 1.8 Upon receiving the response from the officer, the person who filed the complaint may appeal to the Board of Beit Rayim to review and determine the disposition of the complaint at issue.
- 1.9 The determination of the Board shall be final and the officer shall abide by and implement any of their recommendations.
- 1.10 The officer shall communicate and explain this policy and give training regarding it to all employees and volunteers who might be in a position to collect, retain or use personal information.
- 1.11 The officer shall prepare and disseminate information to the constituency which explains Beit Rayim's protection of personal information policies and procedures.

Identifying purposes

2.1 The officer shall document the purpose for which personal information is collected to comply with the openness and individual access principles outlined below.

2.2 The officer shall determine the information that will be needed to fulfill the purposes for which the information is to be collected in order to comply with the limited collection principle.

2.3 The officer shall ensure that the purpose is specified at or before the time of collecting the personal information from an individual.

2.4 The officer shall ensure that the information collected will not be used for any other purpose before obtaining the individual's approval, unless the new purpose is required by law.

2.5 The officer shall ensure that a person collecting personal information will be able to explain to the individual why the information is being collected, how it will be retained and if and when it will be disclosed.

2.6 The officer shall ensure that limited collection, limited use, disclosure and retention principles are respected in identifying why personal information is to be collected.

Consent

3.1 The officer shall ensure that the individual from whom personal information is collected consents to the collection and to the manner in which it will be used and disclosed.

3.2 The officer shall ensure that the individual can reasonably understand why and how the information will be used when consent is given.

3.3 The officer shall ensure that express consent is obtained wherever possible and appropriate. In some circumstances, implied consent may be acceptable if the information's sensitivity and the policy's purpose and intent is respected. (For example, implied consent would exist if it is generally understood that information obtained when a member joins Beit Rayim will be used for synagogue-related purposes such as bulletins or mailings or tele-chain messages, fundraising, etc.)

3.4 In obtaining consent, the officer shall ensure that the individual's reasonable expectations are respected. (For example, a person giving his/her name to Beit Rayim to receive fundraising information reasonably expects that the synagogue will use that personal information to send other information about fundraising)

activities. The individual would likely expect that the information would be used for fundraising purposes.)

3.5 The officer shall ensure that the consent obtained from an individual is clear and in an appropriately verifiable form. For example, an application form may be used and kept on file where the individual consents to the collection and specific use; a check box may be used to permit information already on file to be used for a new purpose; consent may be given orally which would require the receiver of the consent to create appropriate documentary evidence; or consent might be given by email, requiring an electronic record to be maintained.

3.6 The officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The individual shall promptly be informed of the implications of the withdrawal.

Limiting Collection

4.1 The officer shall ensure that personal information will not be collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfill the purposes identified.

4.2 The officer shall ensure that information is collected only by fair and lawful means without misleading or deceiving individuals as to the reason.

4.3 The officer shall ensure that the identifying purposes and consent principles are followed in identifying why personal information is to be collected.

Limiting use, disclosure and retention

5.1 The officer shall ensure that personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law, and any use of personal information shall be properly documented.

5.2 The officer shall ensure that all personal information is destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant.

5.3 The officer shall ensure that all use, disclosure and retention decisions are made in the light of the consent principle, the identifying purposes principle and the individual access principle.

Accuracy

6.1 The officer shall reasonably ensure that the personal information is accurate, complete and up to date, taking into account the individual's interests. The officer shall ensure that the information is sufficiently accurate, complete and up to date to minimize the possibility that inappropriate information might be used to make a decision about an individual.

6.2 The officer shall ensure that Beit Rayim does not routinely update personal information unless it is necessary to fulfill the purposes for which it was collected.

6.3 The officer shall ensure that personal information used on an ongoing basis should be generally accurate and up to date, unless limits to the requirement for accuracy are clearly outlined.

Safeguarding information

7.1 The officer shall ensure that Beit Rayim has security safeguards to protect personal information against loss or theft and unauthorized access, disclosure, copying, use or modification. This shall be done regardless of the format in which Beit Rayim holds the information.

7.2 Depending on the information's sensitivity, the officer may permit reasonable discretion regarding the information that has been collected: the amount, distribution, format and method of storage. A higher level of protection shall safeguard more sensitive information according to the consent principle's considerations.

7.3 The officer shall ensure that the protection methods include:

1. Physical measures (locked filing cabinets, restricted access to offices);
2. Organizational measures (security clearance, limiting access on a 'need to know' basis); and
3. Technological measures (passwords and encryption).

7.4 The officer shall ensure that all employees and volunteers know the importance of keeping personal information confidential.

7.5 The officer shall ensure that care is taken when personal information is disposed of or destroyed to prevent unauthorised parties from gaining access to it.

Openness

8.1 The officer shall ensure that Beit Rayim is open about its policies and practices regarding the management of personal information. The policies and information about the related practices shall be available without unreasonable effort in a generally understandable format.

8.2 The officer shall ensure that information about Beit Rayim's policies and practices shall include:

1. The name or title and address of the officer who is accountable for Beit Rayim's policies and practices and to whom complaints or inquiries may be forwarded;
2. The means of gaining access to personal information held by Beit Rayim;
3. A description of the type of personal information held by Beit Rayim, including a general account of its use;
4. A copy of any information that explains Beit Rayim's policies, standards or codes; and
5. What, if any, personal information is made available to related organizations.

8.3 The officer shall ensure the information that must be provided according to 8.2 is available on the Beit Rayim website or in print as requested.

Individual access

9.1 The officer shall ensure that upon request, an individual shall be informed whether Beit Rayim holds personal information about him/her. If possible, the information's source shall also be given. Beit Rayim shall allow the individual access to this information. It shall also account for the use that has been made or is being made of this information and give an account as to any third parties to whom it has been disclosed.

9.2 If Beit Rayim has supplied personal information about an individual to third parties, the officer shall ensure that an attempt is made to be as specific as possible with a list of the organizations to which it has actually disclosed the information. If an actual list is impossible to provide, a list of organizations to which it might have disclosed information about the individual is to be provided.

9.3 The officer shall ensure that Beit Rayim responds to an individual's request within a reasonable time and at minimal or no cost to the individual. The requested information shall be made available in a generally understandable form with abbreviations or codes explained.

9.4 The officer shall ensure that when an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Beit Rayim shall amend the information as required. When appropriate, the amended information shall be transmitted to third parties having access to the information.

Challenging compliance

10.1 The officer is authorized to address a challenge concerning compliance with the above principles.

10.2 The officer shall develop procedures to receive and respond to complaints or inquiries about the policies and practices regarding the handling of personal information. The compliance procedures shall be easily accessible and simple to use.

10.3 The officer shall inform individuals inquiring about lodging complaints that relevant complaint procedures exist.

10.4 The officer shall investigate all complaints. If a complaint is found to be justified, the officer shall take appropriate measures, including, if necessary, amending the policies and practices.

COMPLIANCE PRACTICES: PROTECTING PERSONAL INFORMATION AT BEIT RAYIM SYNAGOGUE AND HEBREW SCHOOL

Accountability

A Beit Rayim Executive Board Member has been appointed as the Personal Information Compliance Officer (the 'officer') of Beit Rayim.

The officer may be contacted with any query or complaint related to the collection, use or retention of personal information. If a complaint is received, the officer will investigate the complaint and take corrective action if required. If the complainant is not satisfied with the action of the officer, he/she may appeal to the Executive Board to review and determine the disposition of the complaint.

The officer will communicate and explain the policy to all employees and volunteers who collect, retain or use personal information at Beit Rayim. Information which explains the Beit Rayim's protection of personal information policies and procedures has been prepared and is made public on the Beit Rayim website.

Identifying Purposes

Beit Rayim collects personal information for the following purposes:

- to create membership lists
- to communicate with committee and board members and volunteers
- to inform members about the life of the synagogue
- to send synagogue publications, newsletters, bulletins
- to register participants for synagogue and synagogue-related events

This list is not exhaustive and it may changed or be added to occasionally.

Consent

An individual's consent will be sought for collection of personal prior to publication.

When an individual completes an application or registration form, consent to collect the information is assumed. Verbal consent will be recorded on electronic or hardcopy documents with the date and name of the person collecting the information. If consent is given in written or email form, a copy of the consent will be kept on file.

A large volume of personal information was collected prior to January 1, 2004. This information will be handled in a manner consistent with the principles of the Policy to Protect Personal Information in Beit Rayim. Individuals wishing to review their personal information held by Beit Rayim may contact the Privacy Officer and may request the information be deleted.

Consent may be withdrawn by an individual. The individual shall be informed of the implications of the withdrawal.

Documents such as news releases or electronic communications will give individuals the option not to receive information in the future and provide a means for them to unsubscribe from future mailings and to remove their addresses from the mailing list.

Limiting Collection

Information is collected by Beit Rayim for the purposes identified and is collected in a fair and lawful manner, consistent with the principles of the Privacy Policy. Information may be collected on an application or registration form or verbally. If collected verbally, the person gathering the information will record the date, the reason for collecting the information and an indication that consent was given.

The personal information collected is usually limited to name, title, gender, religion, address, telephone number, email address and congregational or committee membership.

Limiting use, disclosure and retention

Personal information will only be used for the purposes identified.

Personal information is only able to be accessed by employees, administrators and volunteers as permitted from time to time by Beit Raim. All employees, administrators and volunteers will be provided guidance about how to appropriately use, retain and protect personal information.

Personal information will not be disclosed to any third party without an individual's consent. If personal information is to be published either in a document or on the Beit Rayim website, consent will be obtained from the individual(s) to publish their information prior to publication, where possible.

Individuals who would normally have their personal information published in the Beit Rayim bulletin, newsletter, membership directory, etc will be given the option to have their personal information suppressed. If the information is to be suppressed, their contact information will be listed in the synagogue office. If a

third party requests personal information about an individual who chooses to suppress their information, the individual must be contacted to obtain their consent prior to releasing the information.

Personal information may be retained indefinitely by Beit Rayim as the information is often used to compile statistical, archival and historical records about the synagogue. Individuals may request that their personal information be deleted.

Accuracy

Beit Rayim will endeavor to ensure that personal information collected and used is accurate. However, individuals are relied upon to inform the synagogue of changes to their personal information. Changes should be communicated to the synagogue office administrator.

Safeguarding Information

Personal information in Beit Rayim is normally stored electronically although documentary information can be found in the synagogue office. This information and documentation is protected by password or lock and key.

Information that is printed such as mailing lists, committee membership lists etc will be protected against loss, theft or unauthorized access by ensuring such information is securely filed after use. Printed personal information will be shredded prior to being discarded.

Openness

Beit Rayim will publish its policies and practices regarding the management of personal information on its website. Individuals who request information about the policy and practices may be directed to the website if appropriate or will be provided with a hardcopy of the policy and these compliance practices.

Individual access

Individuals are entitled to know what personal information Beit Rayim holds and how it is to be used, disclosed or retained. An individual may make a request to access their information by contacting the Privacy Officer. Beit Rayim will respond to such requests within a reasonable time and at no cost to the individual. Corrections to information and requests to delete information will be

handled as quickly as possible. The synagogue office should be advised of any subsequent changes.

Challenging compliance

The Beit Rayim Privacy Officer will address all concerns and queries related to the collection, use and retention of personal information and will respond to any challenges as soon as possible.

Complaints or queries will be received in writing by the Privacy Officer to:

Privacy Officer
Beit Rayim Synagogue
Attention: Privacy Officer
9711 Bayview Avenue
Richmond Hill, Ontario, Canada
L4C 9X7

Compliance

Privacy Officer
Beit Rayim Synagogue
Attention: Privacy Officer
9711 Bayview Avenue
Richmond Hill, Ontario, Canada
L4C 9X7

Beit Rayim encourages any individual who has a query or complaint about the management of personal information in the synagogue to contact the Privacy Officer.