



Summary: 10 things to know about FirstU Toronto's Information Privacy Policy

1. The FirstU Toronto's Information Policy describes what personal information is collected by FirstU Toronto, why it's collected, and outlines the restrictions on how this information is used and stored.
2. The policy is based on [10 fair information principles](#) recommended by federal privacy
3. legislation. (*Personal Information Protection and Electronic Documents Act (PIPEDA) (2000, c.5)*).
4. FirstU Toronto collects the minimal personal information needed in order to operate the congregation and comply with legal/regulatory requirements.
5. We do not use personal information for anything other than the purpose for which it was collected.
6. We do not collect and store any additional personal information without obtaining informed consent.
7. We do not sell, barter or exchange personal information. We do not share personal information with third parties (unless required by law, as detailed in the policy).
8. We protect personal information with security safeguards, which are reviewed regularly to ensure they are relevant and up to date. We make every reasonable effort to prevent loss, misuse, disclosure, or modification of the information, as well as unauthorized access to it.
9. In providing your personal information, you are expected to provide accurate information, and notify us if this information changes.
10. You have the right to request access to see what personal information we have on record for you. You may also request a correction of your personal information.
11. We appoint an [Information Privacy Administrator](#) as the point of contact for any questions or concerns about the collection, use or disclosure of your personal information, and for any request for access.

Information Privacy Policy



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Background

This policy outlines the principles and practices followed by the First Unitarian Congregation of Toronto (FirstU Toronto) in protecting personal information. These principles and practices are informed by best practices as expressed in privacy standards and legislation. While current information privacy legislation in Ontario applies to commercial activities, our policy follows the major principles of the legislation.

Purpose

The purpose of this policy is to outline the information privacy processes followed by FirstU Toronto. This policy applies to FirstU Toronto and to any person providing services on behalf of FirstU Toronto.

Definitions

Personal Information: includes any factual or subjective information, recorded or not, about an identifiable individual – that is, it is information which can, directly or indirectly, identify an individual. Personal Information includes information in any form (e.g., printed/electronic, textual/image).

Personal Information includes but is not limited to: photographs, home address, personal phone numbers, age, personal email address, race, national or ethnic origin, colour, religion, sexual orientation, marital status, mental or physical disability, family members' names, employee files, identification numbers, evaluations, disciplinary actions, the existence of a dispute and related opinions, comments, social status, income, credit and bank records, donation information, loan records, or medical records or information pertaining to participation in any of the FirstU Toronto's programs, events or operations.

Personal Information does not include the name, title, business address, or business telephone numbers of an employee of an organisation.

Personal Financial Information: personal Information of a financial nature and includes but is not limited to: pledge and donation records; financial account details; and payroll/benefits-related information.



Qualified Recipient: any person or entity engaged by the FirstU Toronto (be it as employee, contractor, agent, partner, volunteer, or in any other capacity) that has explicitly acknowledged in writing that in receiving Personal Information they are acting on behalf of the FirstU Toronto and bound by this Policy, subject to all the terms and conditions therein as incumbent upon the FirstU Toronto, or by a similar policy or agreement accepted by the Board as imposing substantially the same terms and conditions as this Policy.

Use vs. Disclose: “Use” refers to internal use of Personal Information by FirstU Toronto. “Disclose” means to reveal/give Personal Information possessed by FirstU Toronto to people within the congregation and to third parties.

Policy Statement

FirstU Toronto will maintain information privacy that complies with all applicable legislation.

Policy Description

FirstU Toronto’s Information Privacy Policy is based on the ten principles for handling Personal Information as set out in the federal *Personal Information Protection and Electronic Documents Act* ([PIPEDA](#)). These principles are accountability; identifying purposes; consent; limiting collection; limiting use, disclosure, and retention; accuracy; safeguards; openness; individual access; and challenging compliance.

1. Why We Collect Personal Information

FirstU Toronto collects only the minimal personal information needed for purposes associated with the active operation of the FirstU Toronto and to comply with legal and regulatory requirements.

Personal Information collected and stored includes basic contact information such as names, personal addresses, telephone numbers, email addresses; family or household relationships, (e.g., spouse/ partner, parent, child); date of birth; date of membership and/or of first attending FirstU Toronto.

We collect this information to:

- plan, develop, improve, deliver, administer, evaluate and promote effective programs, to help ensure safety and security, and to enable effective, communication within the FirstU Toronto community;

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- satisfy legal requirements including reporting requirements as an incorporated entity and as a registered charity;
- enable FirstU to recruit and manage its staff and volunteers and to comply with legal requirements;
- undertake and finance operations by tracking annual and other donations, and donation history made to various funds;
- have Information regarding participation in FirstU Toronto's programs, events and operations; and
- satisfy denominational information requirements with which FirstU Toronto carries on its activities (e.g., the CUC).

2. Accountability

FirstU Toronto is responsible for all Personal Information in its possession or custody. The FirstU Toronto Administrator, acting as the Information Privacy Administrator, is responsible to ensure that FirstU Toronto complies with its privacy obligations in accordance with applicable privacy laws, and this Policy.

The Information Privacy Administrator is the point of contact for questions or concerns about the collection, use or disclosure of personal information by FirstU Toronto, and for any request for access to such information, or any other matter related to the handling of personal information. The Information Privacy Administrator will investigate requests and complaints, and ensure that appropriate measures are taken.

3. Consent

Subject to the limitations provided in section four (Limiting Collection, Use, Disclosure, Retention and Research of Personal Information), consent to the collection, use and disclosure of Personal Information as defined in this Policy is obtained in multiple ways including:

3.1 Express Consent may be requested in certain specific situations such as a police background check for an individual who will work with vulnerable people or with financial assets.

3.2 Implied consent which FirstU Toronto reasonably infers when an individual:

- chooses to identify themselves to FirstU Toronto as a member, friend, regular attendee or visitor or any other class of congregant;
- donates, pledges, volunteers, participates in the FirstU Toronto's meetings or activities, stands for/assumes a leadership position;
- applies to be or is a staff member or supplier of services to FirstU;
- rents or uses church assets or participates in an activity that rents or uses church assets; or
- As described on FirstU Toronto webpage, registers through our website, or subscribes to our newsletters.



3.3 *Opt-Out Consent* where FirstU Toronto offers an individual the option to refuse consent to the collection, use or disclosure of their Personal Information (e.g., inclusion in the FirstU Toronto directory).

3.4 *Consent to collect and store financial information* where individuals who make a financial contribution by cheque, credit card, or by direct withdrawal from a bank account, must consent to the collection and storage of that information so that FirstU Toronto may process the donations.

3.5 *Third Party Systems and Services*: In the course of interacting with the FirstU Toronto, participating in its operations, programs or events, or using the FirstU Toronto's assets, an individual may use mechanisms not wholly in the control of the FirstU Toronto including, but not limited to: the Internet; web browsers; computer programs; databases; video, audio, text or other communications mechanisms. Personal Information collected via such mechanisms is governed by the privacy policies of the owner of the mechanisms.

3.6 An individual may ask to withdraw their consent or opt out of the uses or disclosures of Personal Information for the purposes identified in this Privacy Policy by contacting our Privacy Administrator. FirstU Toronto reserves the right to determine if the information is necessary for the purposes of collection as set out in section one (Why we collect Personal Information).

3.7 The FirstU Toronto may disclose Personal Information for which there is implied consent (as defined in Section 3.2) to Qualified Recipients.

3.8 In further limited circumstances, FirstU Toronto may use or disclose Personal Information without the knowledge or consent of the individual. These circumstances include:

- Disclosure of members' names and contact information to the Canadian Unitarian Council (CUC) for its operations. The CUC does not share this information with outside bodies;
- Disclosure through the donation of selected archival records to the City of Toronto Archives;
- Disclosure as required by governmental bodies acting with authority, as authorized or required by applicable legislation, or as required to comply with a court order or subpoena; or
- Disclosure of Personal Information for research purposes as described in section seven (Limiting Research).



4. Limiting Collection, Use, Disclosure, Retention & Research

FirstU Toronto is committed to collecting personal information in a fair, open and lawful manner. Personal Information collected will be limited to that required for the purpose or purposes identified by FirstU Toronto and may only be used for the purposes for which it is collected.

4.1 Personal information is only retained for as long as necessary to fulfil the purposes for which it was collected and for legal and business purposes. Personal information in the FirstU Toronto's records will be reviewed on an ongoing basis, to remove identifying information that is no longer required or relevant.

4.2 FirstU Toronto will not collect and store any additional personal information without obtaining informed consent, except as allowed.

4.3 FirstU Toronto collects Personal Information only from the individual, an immediate family member authorized to provide the information, a guardian, or an individual with power of attorney. Exceptions to this include:

- Police or other checks as required for certain roles and responsibilities;
- Reference checks for prospective staff which will be obtained from prior employers; and
- Meeting minutes and related reports, annual reports, newsletters, orders of service, church correspondence and audio and video recording of church service.

4.4 Personal information used for demographic or statistical analysis will be anonymized.

4.5 The retention, use and disclosure of personal information for historical, statistical or scholarly research is deemed compatible with the purpose for which it was collected, subject to the use and disclosure provisions in section seven (Limiting Research).

4.6 FirstU Toronto does not sell, barter or exchange personal information it holds. It does not share personal information with third parties except as required by law and when explicit permission is granted.

4.7 Need-to-Know Basis: FirstU Toronto will share only those specific data items of Personal Information with Qualified Recipients necessary to perform the task assigned by FirstU Toronto. Further restrictions on the disclosure to, and access by, specific Personal Information are provided in section nine (Personal Information with Specific Restricted Access).

4.8 Use or Disclosure without Consent or to a person or entity that is not a Qualified Recipient (Non-compliance with this Policy) could lead to disciplinary action, up to and including the termination of an individual's employment or volunteer relationship with FirstU Toronto. Principles of fairness and due process will apply.



5. Accuracy

FirstU Toronto makes every reasonable effort to ensure that personal information is accurate and complete. FirstU Toronto relies on each individual to notify it if there is a change to their personal information, such as their contact information.

6. Safeguards for Personal Information

FirstU Toronto makes every reasonable effort to prevent any loss or misuse of the information, as well as unauthorized access, disclosure or modification to it. FirstU Toronto protects personal information with security safeguards and reviews these safeguards annually to ensure that they are relevant and up to date. These safeguards include:

6.1 *Physical measures* such as paper documents containing personal information are kept in locked filing cabinets within a secure premise. These documents are reviewed on an ongoing basis for relevance and are shredded once information is entered into the FirstU Toronto's records or when no longer required.

Donation files are kept in a locked file cabinet. Donations are managed through a specialised software program which is password-protected. Access is granted only to members of the Finance Team including the Chair of Team Generosity as well as to the President of the Board. To minimise the collection and storage of personal financial information, FirstU Toronto encourages the use of direct deposit and e-transfers to electronically transfer funds to FirstU Toronto, or the use of the electronic "Donate" mechanism on the FirstU Toronto homepage.

6.2 Organizational measures such as access to files containing personal information is limited to staff and authorized volunteers who are responsible for pastoral matters, or who are responsible for keeping data up to date. Access to financial and banking information is limited to the Finance Team, and persons responsible for providing technical assistance. Staff other than those responsible for data upkeep may view basic contact information, but not change the information. Passwords are cycled on a scheduled basis.

6.3 Technological measures such as:

- whenever possible storing the data in a cloud-based data system which encrypts data at transit and at rest;
- ensuring that all computers, including computers used by staff and volunteers have anti virus/anti malware software, passwords and encryption;
- backup software that allows continuous encryption and remote wiping of data.
- Identity management and access control practices that enable and disable accounts for volunteers with tiered access and staff with unique, complex passwords

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- Two-factor authentication for those users accessing the most sensitive data.
- Password complexity and regular password cycling is enforced along with best practices avoiding password sharing
- Any computer used to access the data is kept up-to-date with updates and security patches
- Networks are secured with firewalls, virtual LANs to separate public (guest) from private traffic
- Data governance with public, internal and confidential data, and separate controls for each.
- Credit card and financial information is secured in a manner that is compliant with PCI Standards.

6.4 FirstU Toronto uses third-party service providers in the storage and processing of Personal Information. Before using a particular third-party service provider, FirstU Toronto will review and assess the privacy and security commitments of the provider to assess sufficient consistency with this policy. When possible, FirstU Toronto will enter into a church-specific agreement with the service provider that reflects this policy. However, this is often not possible, and FirstU Toronto must rely on the provider's published privacy policies and security practices.

6.5 Due to the nature of the North American services marketplace, some service providers relevant to FirstU Toronto are based in the United States and are subject to U.S. laws including the U.S.A. PATRIOT. Act.

6.6 Records that contain Personal Information about sensitive issues potentially harmful to the reputation of one or more congregants will be kept by the Minister or in some other secure fashion as approved by the Board, rather than with the rest of the archives.

7. Limiting Research

7.1 The Board, either for FirstU Toronto's own purposes consistent with this policy or in response to an external proposal, may approve an initiative for congregational, denominational (i.e., Unitarian Universalist), or scholarly research involving access to Personal Information in First Toronto's possession or control. When the Board approves such a research initiative, prior to providing access to FirstU Toronto's records, the Board will ensure there is a written agreement between FirstU Toronto and the researcher(s) which at a minimum clearly defines:

- the purpose and scope of the research;
- the responsibility assumed by the researcher(s) to abide by this policy and any other relevant FirstU Toronto policies;
- the requirement for written approval by the board prior to any disclosure by the researcher(s) of Personal Information obtained through access to FirstU Toronto's records;

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- any restrictions on which FirstU Toronto records may not be accessed for the research, the circumstances for access to FirstU Toronto's records, including time and location for access to the records, and any restrictions on copying FirstU Toronto's records; and,
- prior to any publication of work arising from the Research, the Board will review the proposed publication and will determine whether to approve any disclosure of Personal Information that was found in FirstU Toronto's records.

7.2. When considering whether to approve disclosure of Personal Information arising from a research initiative, the Board will consider whether the researcher has obtained the express consent of the individual(s). When the researcher has not obtained express consent for the disclosure, the Board may approve disclosure in the following circumstances:

- a reasonable person would not consider the Personal Information to be too sensitive to the individual to be disclosed at the proposed time;
- the Personal Information is already in the public domain;
- the Personal Information is about someone who has been dead for 20 or more years; or
- the Personal Information is in a record that has been in existence for 100 or more years.

8. Donations to the City of Toronto Archives

8.1 FirstU Toronto has donated its archives with specific exclusions (described in section nine) to the City of Toronto Archives.

8.2 The written agreement with the City of Toronto Archives specifies the rules for access to these archives.

8.3. Rules regarding research related to records donated to the City of Toronto Public Archives are covered by FirstU Toronto's agreement with the City of Toronto Archives.

9. Personal Information with Specific Restricted Access

This section identifies specific categories of Personal Information for which there is specific restricted access. All documents referenced in section 9 are not eligible for donations to the City of Toronto Archives.

9.1 Staff Employment Records

Staff employment records (e.g. performance reviews, disciplinary actions, health records) will be kept securely and are to be accessible only by the Minister as chief of staff; the President; Chair of the Committee on Shared Ministry; the staff's immediate supervisor if other than the Minister.



9.2 Ministerial Counselling Records

Ministerial counselling records must be kept securely by the Minister who performed the counselling and are accessible only by that minister or spiritual care team staff member unless the individual to whom the records relate provides express written consent for access by another individual.

9.3 Police Record Checks

FirstU Toronto, according to its Safe Steps Policy, is required to obtain and retain Police Record Checks for volunteers and staff involved in certain roles. Police Record Checks are confidential and access to them is restricted as per the Safe Steps Policy.

9.4 Personal Financial Information

In addition to the subject of the Personal Financial Information, the incumbents in the following roles are entitled to access the Personal Financial Information of congregants for the purpose of church financial planning, management and operations, and will sign confidentiality agreements.

These roles are: President; Treasurer; Minister; Chair of Team Generosity; Director of Administration; Finance Team and any other positions as deemed necessary.

9.5 Other Personnel

Some staff and volunteers who are not explicitly approved to access personal financial data might nonetheless have incidental exposure to it (e.g. those opening mail, photocopying). These volunteers and staff must be informed of the confidentiality of personal information, and advised of their responsibility to hold the information private.

10. Transparency

This Policy and contact information for the Information Privacy Administrator must be posted on the FirstU Toronto website.

11. Access to Personal Information

11.1 Individuals have the right to request access to their own personal information held by FirstU Toronto. Individuals may also request a correction of their personal information. Any such requests should be made by sending an email to the Privacy Administrator specifically identifying the information requested. The Privacy Administrator will handle the requests taking into account any legal restrictions.



11.2 FirstU Toronto reserves the right to refuse a request for access to Personal Information if:

- The information is protected by solicitor-client privilege;
- Doing so would violate any applicable legislation or contracts;
- Doing so would disclose Personal Information, including opinions, about another person;
- Doing so would reasonably be expected to threaten the safety or security of another individual;
- The information was collected for purposes related to the detection and prevention of fraud; or,
- The information was generated in the course of a formal dispute resolution process.

12. Challenging Compliance

FirstU Toronto, through its Information Privacy Administrator, will respond promptly to any concerns regarding FirstU Toronto's compliance with this Policy.

Accountability

The Board is responsible for the implementation of this policy.

Related Documents and/or relevant legislation

- [Safe Steps Policy](#)
- Personal Information Protection and Electronic Documents Act ([PIPEDA](#))
- [Online Privacy Policy – First Unitarian Congregation of Toronto](#)