



## GOOD SHEPHERD MINISTRIES

GOOD SHEPHERD CENTRE  
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### Good Shepherd Ministries Privacy Policy

#### Our Commitment

Good Shepherd Ministries is committed to protecting the confidentiality and privacy of all persons with whom it interacts.

Good Shepherd Ministries maintains a process to ensure the appropriate collection, use and disclosure of personal information of its clients, staff, volunteers, associates and benefactors and desires to comply with and meet its obligations under federal and/or provincial privacy laws. Personal information does not include name, business title and business phone number.

Any individual who collects, uses, or discloses personal information for Good Shepherd Ministries is required to follow the ten practices as outlined.

#### Practices

##### 1. Accountability for Personal Information

Good Shepherd Ministries is responsible for the personal information under its custody or control. Good Shepherd Ministries designates the Executive Director, David Lynch, as the Chief Privacy Officer who is accountable to ensure compliance with this policy.

In adherence to this policy, Good Shepherd Ministries is responsible for both personal information in its physical custody and personal information that is transferred by Good Shepherd Ministries to a third party.

Good Shepherd Ministries is committed to privacy and confidentiality of personal information and will implement policies and procedures to:

- protect personal information
- receive and respond to complaints
- respond to enquiries on privacy related matters
- educate anyone who collects, uses or discloses personal information on behalf of Good Shepherd Ministries
- ensure public availability of Good Shepherd Ministries' privacy policies
- review privacy policy regularly.

##### 2. Identifying Purposes for Collection of Personal Information

- Purposes for which personal information is being collected will be
- identified by Good Shepherd Ministries prior to the time of collection so that informed consent can be obtained from the individual concerned

- Collection of information will be for purposes directly related to client services, administration and management of Good Shepherd Ministries programs and services, fundraising, statistical reporting, legal and regulatory requirements and as permitted by law.
- Should a situation arise where personal information that has been collected is to be used for a new purpose, Good Shepherd Ministries will take reasonable steps to ensure that the individual concerned is informed and gives his/her consent to the collection and use of personal information for said new purpose.

### 3. Consent for Collection, Use and Disclosure of Personal Information

Express or implied knowledge and consent of an individual is required for the collection, use and disclosure of personal information.

Information on clients, staff, volunteers, associates and benefactors will not be released without consent. Exception to this practice includes; refusing or neglecting to provide such information which could endanger the safety of others, or disclosure of information that is required by law.

An individual may withdraw his/her consent to collection, use or disclosure at any time subject to legal or contractual restrictions and reasonable notice. Be aware, however, that a withdrawal of consent may impair the ability of Good Shepherd Ministries to offer an individual its full range of services.

#### *Disclosure to Service Providers & Third Parties*

Good Shepherd Ministries may transfer personal information to a third party for processing. Good Shepherd Ministries will ensure any such third party will provide a comparable level of protection.

#### *Exceptions to Consent Requirement*

Good Shepherd Ministries may lawfully collect personal information without an individual's knowledge or consent where

- Collection of personal information is in the best interest of the individual and cannot be attained in a timely manner
- Publicly available information
- Collection required or authorized by law
- Information collected by another organization and has received individual consent for the purposes for which it is being used
- Disclosure to barrister or solicitor representing Good Shepherd Ministries

### 4. Limiting Collection

Good Shepherd Ministries limits the amount and type of personal information collected to that which is necessary to fulfill the purposes identified by Good

Shepherd Ministries. Good Shepherd Ministries will collect information directly from the individual unless the law permits or requires collection from third parties.

## 5. Limiting Use, Disclosure and Retention

Good Shepherd Ministries will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law.

Personal information will be retained only for as long as necessary for the identified purposes and for legal or business purposes, some of which time periods may be determined by legislation.

Good Shepherd Ministries will destroy, erase or make anonymous any personal information no longer required for identified purposes or for legal requirements.

## 6. Accuracy of Personal Information

Good Shepherd Ministries will strive to ensure personal information is as complete and up-to-date as reasonably possible. Good Shepherd Ministries generally will rely upon the individual to provide updates information, such as contact information, address change and any other information necessary for the purposes for which it is to be used.

Should an individual demonstrate that personal information is inaccurate, incomplete, out of date, or irrelevant, Good Shepherd Ministries will revise the personal information. If necessary, the agency will disclose revised information to third parties which were provided with inaccurate, out of date information to permit them to revise their records.

## 7. Safeguards

Good Shepherd Ministries adopts security safeguard measures to protect personal information from loss, unauthorized access, disclosure, copying, use, modification or disposal. The nature of safeguards will depend upon the sensitivity of the information collected, the amount, distribution and format of information. More sensitive information will be safeguarded at a higher level of protection.

Safeguards include:

- Physical measures – locked filing cabinets and restricted access to offices
- Organizational measures – limiting access on a “need-to-know” basis and security clearances
- Technological measures – use of passwords, encryptions and audits

Good Shepherd Ministries requires anyone who collects, uses or discloses personal information to be aware of the importance of maintaining confidentiality and adhering to the policies and procedures protecting personal information. All staff and volunteers are

required to comply with Good Shepherd Ministries policies and procedures pertaining to the security of personal information.

Good Shepherd Ministries will require third parties to safeguard personal information that may be relayed to them in a manner at least at a level of protection consistent with its policies.

#### 8. Openness

Information about Good Shepherd Ministries' policies and practices relating to management of personal information will be readily available. In addition, information is available to individuals on the process for obtaining access to personal information held by Good Shepherd Ministries and a description of the type of personal information held and an account of its use and disclosures.

#### 9. Individual Access

Individuals may make written requests to gain access to their records containing personal information. Individuals shall be given access to information except where the law requires or permits Good Shepherd Ministries to deny access.

Good Shepherd Ministries will respond to a request within reasonable timelines and costs to the individual as governed by legislation

#### 10. Challenging Compliance

Any individual may direct a challenge or complaint concerning compliance with this policy to the Chief Privacy Officer at

Good Shepherd Ministries  
412 Queen Street East  
Toronto, Ontario, Canada M5A 1T3

Telephone: 416-869-3619 ext. 225  
Facsimile: 416-869-0254  
Email: [david@goodshepherd.ca](mailto:david@goodshepherd.ca)

Good Shepherd Ministries will receive and respond to complaints and enquiries about its policies and practices relating to personal information. Good Shepherd Ministries will investigate all complaints. If an investigation determines that a complaint is justified, Good Shepherd Ministries will take appropriate measures. In certain circumstances set out by legislation, and provided Good Shepherd Ministries has not reasonably remedied a problem or otherwise satisfied an individual's challenge or complaint, the individual may submit the challenge/complaint to the Privacy Commissioner of Ontario or Canada, as applicable.