



PRIVACY POLICY
ORANGEVILLE BAPTIST CHURCH (A Federal Corporation)
O/A COMPASS COMMUNITY CHURCH

In connection with using the on-line registration services (the "Services"), Orangeville Baptist Church ("OBC", "our", "we", "us" or applicable derivation) collects Personal Information from users of our Services ("You"/"Your"). We respect Your rights with respect to our collection of Your Personal Information and it will only be collected, used and disclosed as provided for in this policy or as otherwise specifically consented to by You. The policy will apply to and protect Personal Information (as defined below) collected by OBC.

This policy applies to Personal Information about users of our Services that is collected, used or disclosed to OBC in connection with the Services.

Definitions

To better understand this policy, OBC has set out some basic definitions to use when reading and interpreting it.

Collection: the act of gathering, acquiring, recording, or obtaining Personal Information from any source, including third parties, by any means.

Consent: voluntary agreement to the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of OBC. Implied consent is consent that can reasonably be inferred from the circumstances or from an individual's action or inaction.

Disclosure: making Personal Information available to a third party.

Personal Information: information about an identifiable individual that is recorded in any form but does not include aggregated information that cannot be associated with a specific customer. For a customer, such information does not include that which is aggregated in such a manner that it cannot be connected to him/her and/or information which is publicly listed in a written or online directory or typically made available through directory assistance.

Use: the treatment, handling and management of Personal Information by and within OBC. Collection of Personal Information As indicated above, we only collect Personal Information that You consciously provide as we provide the Services. We may also collect Personal Information if You contact us, through e-mail, telephone conversations or the completion of forms, for support and other inquiries.

Accountability

OBC is responsible for Personal Information under its control and has designated its Privacy Officer as accountable for the company's compliance with the following principles.

1. OBC is responsible for Personal Information in its possession or custody, including information that has been transferred by OBC to a third party for processing. OBC shall use contractual or other means to provide a comparable level of protection while the information is being processed by such a third party.
2. OBC shall implement policies and practices to give effect to: (a) Implementing procedures to protect Personal Information; (b) Establishing procedures to receive and respond to complaints and inquiries; (c) Training staff and communicating to staff information about the organization's policies and practices; and (d) Developing information to explain the organization's policies and procedures.

Purposes and Collection

Where appropriate, OBC will identify the purposes for which Personal Information is collected at or before the time the information is collected.

1. OBC collects Personal Information only for the following purposes: (a) To provide the Services to our organization, including to enrol You at Your selected activities, events, and/or camp(s). In providing the Services, Your Personal Information will be disclosed to us as You have chosen to create an account at; (b) To establish and maintain responsible commercial relations with Customers and users (which will include, but not be limited to: billing, communication and account verification); (c) To meet legal and regulatory requirements; and (d) To administer and manage its business operations.
2. Persons collecting Personal Information directly, other than through the Services, will be able to explain to individuals the purposes for which the information is being collected, or will, upon request, refer the individual to a designated person at OBC who will explain the purposes.
3. Unless required by law, OBC shall not use or disclose Personal Information for any purpose other than those described above without first identifying and documenting the new purpose and obtaining the consent from You, where such consent may not reasonably be implied.

Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of Personal Information, except in certain circumstances as described below:

1. In certain circumstances, Personal Information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate where there is an emergency threatening the individual's life, health or security, or where the individual is a minor, seriously ill, or mentally incapacitated. In other instances, information may be publicly available.
2. In obtaining consent, OBC will use reasonable efforts to ensure that You are advised of the identified purposes for which Personal Information collected will be used or disclosed.
3. The form of consent sought by OBC, in respect of information sought to be collected in association with the Services but outside of the completion of the applicable online registration form, may vary depending upon the circumstances and type of information disclosed. In determining the appropriate form of consent, OBC shall take into account the sensitivity of the Personal Information and the reasonable expectations of its customers and employees.
4. Your use of the Services in the completion of online registration form(s) will be considered implied consent to collect, use and disclose the associated Personal Information for all identified purposes.
5. You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. OBC will inform the individual of the implications of such withdrawal. In order to withdraw consent, You must provide notice to OBC in writing.

Use and Retention of Personal Information

Any Personal Information collected by us will be used solely for the purposes of carrying on our internal business affairs and providing OBC Services to You, and other services as You or your family and friends may request and authorize from time to time. Personal Information will be retained only as long as necessary for the fulfillment of those purposes.

1. Generally, all Personal Information collected by OBC is to provide You or our customers with the Services (i.e., enrol You or Your children at the selected camp(s) and organization(s)) and will be provided to the applicable camp(s) and organization(s) for such purposes as well as for such reasonably ancillary use in connection with the operation of such camp(s) and organization(s). We may also disclose Your Personal Information to: (a) a credit card payment processing company; and (b) any other third party, upon receiving Your consent or as required by law.

2. Only OBC's employees or volunteers with a business need to know, or whose duties reasonably so require are granted access to Your Personal Information.
3. Personal Information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the guidelines and procedures established by OBC. It is OBC's practice to retain Your account registration information after You have registered so that in the following year Your registration information will be pre-filled to simplify the registration process.
4. In the event that we disclose Your Personal Information to the third parties described above or to a data storage company, as appropriate, OBC commits to contractually bind such entities to abide by the fundamental terms of this policy and applicable laws, including with respect to their capability to use, disclose and retain such Personal Information.
5. Except as provided for in this policy, we will not sell, rent, lease, commercially exploit or otherwise disclose Your Personal Information or data to third parties unless: (i) required by law or to cooperate with any bona fide legal investigation; (ii) required to protect the legal interests of OBC or our customers, including for credit checking and collection purposes, as applicable, or in connection with a potential financing, merger or acquisition in which case the applicable counterparties shall be placed under obligations of confidentiality; or (iii) You provide consent to such disclosure. Accuracy At Your request and notification, OBC will update Personal Information as necessary to fulfill the identified purposes. You always have the right to request that we delete, destroy, return, amend or update Your Personal Information in our possession as You may direct, subject to reasonable notice.

Security

Personal Information will be protected by security safeguards appropriate to the sensitivity of the information.

1. Any Personal Information in our possession is stored electronically, either on our server (which may be hosted offsite) or on other electronic storage media that may be retained as part of Your files or otherwise.
2. We have security measures in place to protect against the loss, misuse, access to or alteration of Your Personal Information and data under our control.
3. We operate computer networks that are protected by industry standard firewalls and password protection. Appropriate physical and managerial security is also in place, including but not limited to the execution by our employees of a confidentiality/non-disclosure agreement as a standard practice of our hiring and employment.
4. OBC will protect Personal Information it discloses to third parties through contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.
5. While we cannot guarantee that loss, misuse or alteration to Your data will not occur, we will use our resources and expertise to attempt to prevent such occurrences.
6. We commit to providing a minimum of an annual review and training with respect to this policy among our staff with potential access to Your Personal Information.

Openness and Access

OBC will make readily available to You information about its policies and practices relating to the management of Personal Information. OBC will make this Privacy Policy available to You prior to providing the Services. On request a copy of this Privacy Policy will be provided by mail. You may access or inquire about Your Personal Information in our possession at any time during our business hours. The Personal Information requested will be provided within a reasonable time, and at a minimal or no cost to You. Upon Your request, OBC will be as specific as possible in providing an account of third parties to which it has disclosed Your Personal Information. When it is not possible to provide a list of the organizations to which it has actually disclosed information about an individual, Breeze Church Database Management Systems will provide a list of organizations to which it may have disclosed. NOTE: In certain situations, OBC may not be able to provide access to all of the Personal Information it holds about You. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege. OBC will provide the reasons for denying access upon request.

Challenging Compliance

In the event of any dispute, complaint or problem with respect to this policy and related OBC practices, a definitive procedure for resolution has been established as outlined below. OBC is committed to resolving any such issues promptly, justly, objectively and, where possible, confidentially. A written outline of the issue should be forwarded directly to the Privacy Officer of OBC, who in turn will investigate, examine and evaluate all the facts. On the information gathered and other related details, a formal written decision will be completed and will be forwarded to You within 30 days of the Privacy Officer's receipt of Your complaint. During investigation of the issue, it may be necessary for further Personal Information to be shared with the Privacy Officer or other appropriate parties internal or external to OBC. In all cases, OBC will remain responsible for the protection of all such Personal Information.

Children's Privacy Protection

Children under 18 years of age are not permitted to use our enrolment Services. We do not knowingly collect any information from children under 18 years of age for enrolment. If You are under 18 years of age, You are not permitted to submit Personal Information to us.

Notification of changes

We may update this privacy policy from time to time, so please review it periodically. However, regardless of our right to update this policy as indicated, we will never use Personal Information that You have provided to us in a new way without providing You an opportunity to give us Your consent.

Contact Us

For further information concerning this privacy policy or its application or for access to Your or Your Customers' Personal Information, please write to us, in English only, via e-mail at office@thisiscompass.com.