

Privacy Policy Statement

This policy was adopted by the Board of Governors in August, 2004.

The First Narayever Congregation ("FNC") recognizes the importance of privacy and the sensitivity of Personal Information. We take seriously our obligation to keep this information confidential and we protect it with physical, electronic and procedural safeguards. This Privacy Policy outlines how we manage your Personal Information and safeguard your privacy.

1. Your Privacy Rights

"Personal Information" means information about an identifiable individual but does not include the name, title, business address or telephone number of any employee of any organization.

Starting on January 1, 2004, all Ontario organizations which engage in any activity which can be considered to be of a commercial nature must comply with the federal Personal Information Protection and Electronic Documents Act (in this policy statement called "PIPEDA").

FNC has developed and implemented the Privacy Policy to protect your Personal Information.

2. Why Does FNC Collect Personal Information From You?

FNC collects Personal Information so that we can provide our members and our community with a range of services and activities, which includes:

1. Yahrzeit reminders and aliyot;
2. to recognize contributions and donations made to FNC
3. Bulletin and general notices and mailings;
4. General announcements, including life cycle events, illness and death of family members;
5. Assignment to dues category;
6. Youth activity announcements;
7. Education Committee program announcements
8. Dues collection;
9. Membership privileges;
10. Membership status determination;
11. Fundraising;
12. to generally communicate with our members and their spouses and family members;
13. to understand and assess the needs and requirements of our members and potential members and offering services, programming and events to meet those needs.

Membership in a religious community brings with it certain "understandings", one of which is that certain information or news about members and their life cycle events will be shared with the community. We will continue to share this sort of information unless we are notified that it is not to be.

3. How Do We Collect Your Personal Information

We collect Personal Information only by lawful and fair means and not indiscriminately. We may collect Personal Information directly from you when you become a member of FNC, or during the term of your membership including at the time of renewal and at the time of various life cycle events. We may on occasion obtain information about you from other sources, such as other family members or members of FNC.

4. Consent

FNC will not collect, use or disclose your Personal Information without your consent, except in certain extraordinary circumstances. Extraordinary circumstances might include when legal, medical or security reasons make it impossible or impractical to obtain consent or where it is otherwise in your best interests.

Consent for the collection, use and/or disclosure of Personal Information may be obtained orally or in writing and may be expressly given or implied. As a general rule FNC will operate on the basis that you have provided consent unless you advise us to the contrary. We may from time to time ask you to give your written consent to the use and disclosure of specific Personal Information if we feel that the Personal Information that we are collecting, using and/or disclosing is particularly sensitive. We will use and disclose your Personal Information only in accordance with this Privacy Policy.

5. If You Don't Consent

The choice to provide us with Personal Information is always up to you. Upon request, we will explain your options of refusing or withdrawing consent to the collection, use and disclosure of your Personal Information and will record and respect your written choices. However, your decision to withhold particular details may limit our ability to provide our services to you. This measure is necessary to protect the integrity of the services offered by FNC. Furthermore, any refusing or withdrawing of consent is always subject to any overriding legal requirements or commitments.

6. Disclosure of Your Personal Information

Under certain circumstances FNC may disclose your Personal Information including by way of example in the following circumstances:

1. when we in good faith believe the law requires or authorizes us to do so, including reporting to Canada Revenue Agency of donations received;
2. when the services we are providing require us to give your information to third parties (for example, to a funeral parlour, caterer, educator, non-employed clergy), in which case your consent will be implied unless you tell us otherwise;
3. where it is necessary to establish or collect dues or contributions;
4. when Personal Information provided to third party service providers (such as accountants, computer back-up services or archival file storage) with whom we have contractual arrangements that ensure comparable levels of protection to the internal protection which we maintain for Personal Information;
5. when we engage in joint activities or programs with other organizations of a religious or communal nature;
6. if we are involved in negotiations for merger with another congregation;
7. if the information is already publicly known.

We never make our membership list available to third parties in any form, except as set out in this section or unless we have your consent.

7. Is My Personal Information Secure?

FNC takes all reasonable precautions to ensure that your Personal Information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information, depending on its type and sensitivity, are:

1. premises security;
2. restricted access to Personal Information;
3. deploying technological safeguards and internal security policies;
4. where necessary or appropriate, by requiring third parties to sign confidentiality agreements.

As FNC is responsible for any Personal Information under its control, including Personal Information that FNC may transfer to a third party for processing, we will use contractual or other means to ensure that the third party will have a level of privacy protection comparable to the internal privacy protection maintained at FNC.

8. Updating Your Information

Since we use your Personal Information to provide services to you, it is important that the information be accurate and up-to-date. If any of the information changes, or if you should become aware that the Personal Information which we have is incorrect, please inform us so that we can make the necessary changes.

9. Access to Your Personal Information

You may request access to any Personal Information we hold about you. Summary information is available on written request. More detailed requests that require archive, retrieval or copying costs may be subject to reasonable reimbursement for our actual costs.

10. Can I be Denied Access to My Personal Information?

Your rights to access your Personal Information are not absolute. We may deny access when:

1. denial of access is required or authorized by law or the rules of a formal dispute resolution process, such as a Beth Din;
2. information relates to existing or anticipated legal proceedings against you;
3. granting you access would have an unreasonable impact on other people's privacy; to do so would prejudice negotiations with you;
4. to protect FNC's rights and property; or
5. the request is frivolous or vexatious.

If we deny your request for access, or refuse a request to correct information, we will provide you with a written explanation.

11. How Long Do You Keep My Personal Information?

We retain your Personal Information for as long as you are a member of FNC and afterwards for as long as is reasonably necessary for us to complete our dealings with you, or as may be required by law or for purpose of compliance with our religious obligations. Because synagogue records are often a valuable source of information which may be required for halachic or genealogical purposes, selected items of Personal Information may be retained indefinitely.

12. Website

FNC's website contains links to other sites which are not governed by this Privacy Policy. While no specific Personal Information is retained with respect to any visitor to our website, we may monitor traffic patterns, site usage and related site information to optimise our web service. In the continuing development of our website we may provide aggregated information to third parties, but these statistics do not contain any identifiable Personal Information.

13. Communicating with Us

Email is not a 100% secure medium and you should be aware of this when contacting us to send personal or confidential information.

14. Changes to this Privacy Policy

This Privacy Policy is effective January 1, 2004. Since FNC regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time. Please refer to our website or contact our office for revisions and updates.

15. Accountability and Requests for Access

FNC has appointed a Privacy Officer to ensure that we comply with all applicable privacy legislation and the terms of this Privacy Policy. If you have any questions, wish to review your Personal Information, comment on this Privacy Policy or make a complaint, please contact our privacy officer by email, privacy@narayever.ca

This version of the document was converted from Microsoft Word into HTML by Jim Davis on April 24, 2007. I also corrected a typographic error, added the "history" section, and added an email address for the privacy officer.