

# BETH AVRAHAM YOSEPH OF TORONTO CONGREGATION

## PRIVACY POLICY

As approved by the Board of Governors

May, 2004

**BETH AVRAHAM YOSEPH OF TORONTO CONGREGATION** 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.

### ***Your Privacy Rights***

From 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, also known as PIPEDA.

Beth Avraham Yoseph of Toronto Congregation is responsible for the personal information we collect, use and disclose. To ensure this accountability, we have developed and implemented this policy.

***“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.

### ***Why Does Beth Avraham Yoseph of Toronto Congregation Collect Personal Information From You?***

**Beth Avraham Yoseph of Toronto Congregation** collects this information so that we can provide our members and our community with a range of services and activities, which includes:

- Yahrzeit reminders and aliyot
- Bulletin and general notices and mailings
- General announcements, including life cycle events, illness and death of family members
- Assignment to dues category
- Youth activity announcements
- Dues collection
- Membership privileges

- Membership status determination
- Membership Directories
- Simcha bookings and catering arrangements
- Fundraising
- Brotherhood and Sisterhood programs and activities
- to generally communicate with our members and their spouses and family members
- 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.

### ***How Do We Collect Your Personal Information***

We collect information only by lawful and fair means and not indiscriminately. We may collect personal information directly from you when you become a member of Beth Avraham Yoseph of Toronto Congregation, or during the term of your membership. We may on occasion obtain information about you from other sources, such as other family members or members of Beth Avraham Yoseph of Toronto Congregation.

### ***Consent***

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. In determining how we obtain your consent, we will take into account the sensitivity of your personal information that we are collecting, using and/or disclosing. We will use and disclose your personal information only in accordance with this policy.

### ***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 will limit our ability to provide our services to you. This measure is

necessary to protect the integrity of the services offered by Beth Avraham Yoseph of Toronto Congregation. Furthermore, any refusing or withdrawing of consent is always subject to any overriding legal requirements or commitments.

### ***Disclosure of Your Personal Information***

Under certain circumstances **BETH AVRAHAM YOSEPH OF TORONTO CONGREGATION** may disclose your personal information:

- when we in good faith believe the law requires or authorizes us to do so, including reporting to Canada Revenue Agency of donations received
- 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) your consent will be implied unless you tell us otherwise
- where it is necessary to establish or collect dues or contributions
- 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 will have comparable levels of protection to the internal protection which we maintain for personal information
- when we engage in joint activities or programs with other organizations of a religious or communal nature
- 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.

### ***Is My Personal Information Secure?***

Beth Avraham Yoseph of Toronto Congregation 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:

- premises security;
- restricted access to personal information;
- deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;

- internal password and security policies;
- where necessary or appropriate, by requiring third parties to sign a confidentiality agreement.

As Beth Avraham Yoseph of Toronto Congregation is responsible for any personal information under its control, including personal information that Beth Avraham Yoseph of Toronto Congregation may transfer to a third party for processing, we will use contractual or other means to provide a comparable level of privacy protection when personal information is being processed by a third party on Beth Avraham Yoseph Congregation of Toronto's behalf.

### ***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.

### ***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.

### ***Can I be Denied Access to My Personal Information?***

Your rights to access your personal information are not absolute. We may deny access when:

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

If we deny your request for access, or refuse a request to correct information, we will explain why.

### ***How Long Do You Keep My Personal Information?***

We retain your personal information for as long as you are a member 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.

### ***Website***

Our website ([www.bayt.ca](http://www.bayt.ca)) 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.

### ***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.

### ***Changes to this Privacy Policy***

This policy is effective January 1, 2004. Since Beth Avraham Yoseph of Toronto Congregation regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

### ***Requests for Access***

If you have any questions, wish to review your personal information, comment on this policy or make a complaint, please contact our privacy officer at:

Privacy Officer  
Beth Avraham Yoseph of Toronto Congregation  
613 Clark Avenue West  
Thornhill Ontario  
L4J 5V3  
email: [membership@bayt.ca](mailto:membership@bayt.ca)  
tel: 905 886-3810