

CAPERNEWAY HARBOUR BIBLE CENTRE (“CAPERNEWAY”) PRIVACY POLICY FOR STUDENTS, ATTENDEES, SUPPORTERS AND OTHERS

You can direct complaints, concerns or questions regarding this policy to the privacy officer.

Kevin Galbraith

Phone: 250-246-9440; E-mail: kgalbraith@capernway.ca

OUR COMMITMENT TO PRIVACY AND OUR PRIVACY PRACTICES

Capernway is owned and operated by Torchbearers Capernway Canada Society (“Torchbearers Canada”). Capernway is one of a number of operations of Torchbearers Canada in Canada (the “Canadian Operations”). Torchbearers Canada is a member of Torchbearers International (“Torchbearers International”) which has operations worldwide.

Capernway is committed to protecting the privacy, confidentiality and security of the personal information of parents, guardians, students, attendees, members, supporters and other stakeholders. Capernway values the trust of those Capernway deals with and recognize that maintaining that trust requires that Capernway be transparent and accountable in how Capernway treats the information that you provide to Capernway.

During the course of Capernway’s various activities, Capernway frequently gathers and uses personal information. Anyone from whom Capernway collects such information should expect that it will be carefully protected and that except as otherwise legally required or permitted any use or other dealing with this information is subject to consent. Capernway’s privacy practices are designed to achieve this.

Personal information gathered by Capernway is kept in confidence. Capernway staff is authorized to access personal information based only on their need to deal with the information for the reasons for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. Capernway also take measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed.

This policy is based on the *Ten Privacy Principles* contained in the Canadian Standards Association (CSA) Model Code for the protection of personal information and on which the relevant privacy legislation is founded. Capernway has tailored its own ten privacy principles in compliance with the relevant privacy legislation to meet the specific needs and expectations of its stakeholders.

SCOPE OF POLICY

This policy applies to personal information of individual stakeholders in the possession and control of Capernway. This policy does not apply to employee and volunteer personal information. This information is covered by the Capernway Privacy Policy for Employees and

Volunteers. This policy also does not apply to information collected, used or disclosed with respect to corporate or commercial entities that deal with Capernwray. Corporate and commercial information is protected by other policies and practices of Capernwray and through contractual arrangements.

This policy does not apply to the collection, use or disclosure of your contact information or publicly available information by Capernwray.

DEFINITIONS

In this policy:

“business contact information” means information to contact a person at a place of business, including the person’s name, position, business address, business telephone number, business e-mail address and business fax number.

“collection” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

“consent” means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is clear and does not require any inference on the part of Capernwray. Implied consent exists when Capernwray can reasonably infer consent based upon your action or inaction.

“disclosure” means making personal information available to others outside of Capernwray.

“personal information” means information about an identifiable person that is recorded in any form but does not include his or her business contact information. Personal information includes a person’s age, gender, race, ethnic origin, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, travel history, consumer preference information, personal habits, personal interests and personal history. Personal information does not include information that cannot be associated with a specific person.

“privacy officer” means a person designated by Capernwray who is accountable for compliance with this policy by Capernwray and whose name and contact information are set out at the end of this policy.

“third party” means a person or organization other than Capernwray and you.

“use” means the treatment and handling of personal information by and within Capernwray.

“Capernwray” means the Capernwray Harbour Bible Centre, which operates year-round at Capernwray Harbour, Thetis Island, B.C.

“you” means a parent or guardian of a prospective, enrolled or former student at Capernwray, the student himself, attendees, members, supporters and anyone else for whom Capernwray

collects personal information, except for employees and volunteers of Capernwray for whom Capernwray has a separate privacy policy.

1. CAPERNWRAY ACCOUNTABILITY

Capernwray is accountable and responsible for personal information under its control, including information that has been transferred to a third party. In cases where such transfers take place Capernwray will ensure that the third party has comparable privacy safeguards in place. Capernwray has designated a privacy officer to ensure compliance with this policy.

Ultimate accountability for Capernwray's compliance rests with the Board of Directors of Torchbearers Capernwray Canada Society who delegate day-to-day accountability to the privacy officer. Other persons within Capernwray may be accountable for the day-to-day collection and processing of personal information or may act on behalf of the privacy officer.

Capernwray will adopt policies, procedures and practices to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies, procedures and practices and communicate policies, procedures and practices to you.

2. IDENTIFYING THE PURPOSES OF PERSONAL INFORMATION

When collecting personal information Capernwray will orally or in writing state the purpose of collection and will provide, on request, contact information for the privacy officer who can answer questions about the collection.

Capernwray may collect your personal information for the following purposes:

- to assess applications for admission to (or continued enrolment in) Capernwray by prospective students and attendees or students and attendees through their parents or guardians;
- to assess applications for attendance at conferences and other activities of Capernwray by attendees or attendees through their parents or guardians;
- to determine the financial status (including through credit reports) of attendees and parents or guardians for admission or continued enrolment of students or attendees;
- to provide and administer conference, educational, curricular and other related services through Capernwray;
- to provide administrative services through Capernwray;
- to disclose to parents or guardians, attendees, members, supporters or other stakeholders for the purpose of special events, fund-raising and other matters from time to time, which are directly or indirectly beneficial to Capernwray;
- to administer conference, educational, curricular and other related policies, procedures and practices of Capernwray;

- to disclose grades and other educational or curricular information, as required, to the provincial education authorities;
- to disclose grades and other educational or curricular information (with permission from the attendee or student) to the provincial education authorities for disclosure to prospective post secondary educational institutions;
- to disclose grades and other educational or curricular information (with permission from the attendee or student) to other educational institutions;
- to thank and publicly recognize supporters and other stakeholders;
- to provide supporters and other stakeholders with information about how donated funds are used by Capernwray and/or Torchbearers Canada;
- to keep parents or guardians, attendees, members, supporters and other stakeholders informed about Capernwray activities;
- to promote opportunities for supporters, potential supporters and other stakeholders to support Capernwray and/or Torchbearers Canada;
- to establish and maintain lists of students, parents or guardians, attendees, members, supporters and other stakeholders;
- to publish a directory;
- to compile statistical and historical information about students, parents or guardians, attendees, members, supporters and other stakeholders;
- to build and maintain relationships among stakeholders within Capernwray;
- to disclose information requested by third parties (with permission of parents or guardians or attendees);
- to protect Capernwray, you and others from fraud and error and to safeguard the interest of Capernwray and its students, attendees, staff and representatives;
- to authenticate your identity;
- to collect debts owed by you to Capernwray;
- to ensure staff and contractors comply with their agreements and legal obligations to Capernwray;
- to administer relations with the provincial education authorities and other educational organizations with whom Capernwray has relations from time to time;
- to comply with Canada Revenue Agency requirements for gift processing;

- to comply with any legal or regulatory requirement; and
- to use and disclose for any other purpose directly or indirectly related to establishment or operation of Capernwray.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with Capernwray.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is permitted or required by law.

3. CONSENT

Capernwray will obtain your consent to collect, use or disclose personal information except where Capernwray is permitted or required by law to do so without consent. For example Capernwray may collect, use or disclose personal information without your consent where:

- Capernwray reasonably expects that obtaining consent would compromise an investigation or proceeding;
- Capernwray's use of the information is for acting in an emergency that threatens a person's life, health or personal security;
- Capernwray is collecting or paying a debt;
- Capernwray is obtaining legal advice; or
- Capernwray needs to deal with an anticipated breach of law;

Capernwray will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed.

Your consent may be express or implied and may be given through an authorized representative such as a lawyer or agent. If you are under the legal age, your consent may be obtained from a parent or guardian.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. Consent may be implied by Capernwray if the purpose for the collection of the information would be reasonably obvious to you and is given voluntarily by you for that purpose. Consent may also be implied where Capernwray notifies you that Capernwray intends to collect, use, or disclose information and you do not decline Capernwray's intended action within a reasonable period of time. The manner in which Capernwray obtains consent for the collection of personal information will vary with the sensitivity of the information being collected.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided that Capernwray is given reasonable written notice. Capernwray will inform you of the likely consequences of the withdrawal of consent, which may include the inability of Capernwray to provide certain services to you.

4. LIMITS FOR COLLECTING PERSONAL INFORMATION

Capernwray will only collect personal information that is reasonably necessary to provide a service either directly or indirectly and which is reasonably necessary for the purposes which you consented to. Capernwray will collect personal information by lawful means. Capernwray may also collect information as permitted or required by law.

5. LIMITS FOR USING, DISCLOSING AND KEEPING PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purpose for which it was collected. Capernwray will not use personal information for any additional purpose unless Capernwray seeks your consent to do so. Subject to applicable legal requirements, each of the Canadian Operations and each member of Torchbearers International may transfer information between each other.

Capernwray will retain your personal information only so long as necessary for the identified purposes or for necessary legal or business purposes. Capernwray will keep your personal information used to make a decision affecting you for at least one year after using it to make the decision. Capernwray will destroy, erase or make anonymous documents or the records containing personal information as soon as it is no longer serving the purpose for which it was collected and is no longer necessary for legal or business purposes.

6. ACCURACY

Capernwray will make reasonable efforts to ensure your personal information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, Capernwray will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

Capernwray will not routinely update your personal information unless it is necessary to fulfill the purposes for which it was collected. You may request amendments to the records at Capernwray to ensure the accuracy and completeness of your personal information. If the amendment request relates to information that remains in dispute, Capernwray will note your opinion on the file.

7. SAFEGUARDING PERSONAL INFORMATION

Capernwray is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

Depending on the sensitivity of your personal information, Capernwray will employ appropriate security measures to protect the information. The measures may include, for example, the

physical security of offices and data centers, the limiting of access on a “need-to-know” basis and the use of passwords and encryption.

Capernwray will also use appropriate security measures when disposing of your personal information.

Capernwray will require third parties through contractual or other reasonable means to safeguard your personal information entrusted to them in a manner consistent with the policies, procedures and practices of Capernwray.

8. AVAILABILITY OF POLICIES AND PROCEDURES

Capernwray is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing. To ensure the integrity of our security procedures and business methods, Capernwray may refuse to publicly disclose certain information.

Capernwray will make the following information available:

- The name, title and address of the person accountable for the policies, procedures and practices and to whom complaints or inquiries can be provided;
- A description of the type of personal information held by Capernwray, including a general account of its use;
- A copy of any brochures or other information that explain the policies, procedures and practices; and
- An explanation of what personal information is made available to related organizations.

9. PROVIDING ACCESS TO YOUR PERSONAL INFORMATION

You have a right to access your personal information held by Capernwray. Upon request and confirmation of your identity, Capernwray will, within a reasonable period of time, tell you what personal information it has, what it is being used for and to whom it has been disclosed. You may be asked to be specific about the information that you would like to access and to submit your request in writing. Depending on the type and amount of information requested, Capernwray may charge you a reasonable fee for providing you with access to your information. Where you will incur a cost, Capernwray will inform you of the cost and request your direction on whether or not Capernwray should proceed with the request. Capernwray will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, Capernwray may not be able to provide access to certain personal information. The reasons for not providing this information may include some of the following. It may be information that would threaten the life or security of another person, information generated in a formal dispute resolution process, information that contains references to other

individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, and/or information that is subject to solicitor-client privilege.

If a request is refused, Capernwray will notify you in writing, setting out the reasons for the refusal and resources available to you for redress.

If your personal information is demonstrated to be inaccurate or incomplete, Capernwray will amend the information as required. Where appropriate Capernwray will send the amended information to third parties to whom the information has been disclosed.

10. COMPLIANCE AND COMPLAINTS

Capernwray will, on request, provide you with information regarding its complaint response procedure.

You are to direct any complaints, concerns or questions regarding this policy in writing to the privacy officer. If the privacy officer is unable to address your concern, the issue can be referred to the Board of Directors of Torchbearers Canada. At any point in this process you may also write to the Privacy Commissioner.

Contact Information:

Privacy Officer
Kevin Galbraith
Phone: 250-246-9440
E-mail: kgalbraith@capernwray.ca