

Gracepoint Community Church

Privacy Policy

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1. Our Commitment to Privacy

Gracepoint Community Church ("Gracepoint," "we," "our," or "the Church") recognizes that people entrust us with personal information about themselves and their families. This may include ordinary contact information, information about participation in church life, financial information, information about children, and, at times, deeply personal information shared in the context of pastoral care or prayer.

We take that trust seriously.

Gracepoint is committed to collecting, using, disclosing, retaining and protecting personal information in a manner that respects the dignity and privacy of individuals and complies with applicable privacy legislation, including British Columbia's **Personal Information Protection Act (PIPA)**.

This policy explains our general privacy practices. It is intended to be understandable and transparent rather than exhaustive. Gracepoint also maintains internal procedures governing matters such as information security, records retention, privacy breaches, children's ministry information, and access permissions.

2. Who This Policy Applies To

This policy applies to personal information collected, used or disclosed by Gracepoint in connection with our ministry and operations.

This includes information relating to:

- members and regular attendees;
 - visitors and guests;
 - children, youth and their parents or guardians;
 - volunteers and ministry leaders;
 - employees and applicants;
 - donors and charitable giving;
 - participants in church programs and events;
 - individuals receiving pastoral care or prayer;
 - individuals who communicate with Gracepoint through our website, email, telephone, social media or other means; and
 - other individuals who interact with the Church.
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3. What Is Personal Information?

"Personal information" generally means information about an identifiable individual.

Depending on the circumstances, the information Gracepoint collects may include:

- name;
- mailing address;
- telephone number;
- email address;
- date of birth or age;
- family and household information;
- emergency contact information;
- church membership and participation information;
- volunteer and ministry involvement;
- event and program registrations;
- attendance information;
- photographs, video and audio recordings;
- information provided in prayer requests or ministry communications;
- information relevant to children's ministry and safety;
- information relating to allergies, medical needs or accessibility requirements where voluntarily provided for a ministry or safety purpose;
- information related to criminal record screening for appropriate volunteer or employment roles;
- employment-related information;
- donation and charitable giving information; and
- information contained in correspondence or communications with the Church.

Gracepoint seeks to collect only information that is reasonably necessary for the purpose for which it is collected.

4. Why We Collect Personal Information

Gracepoint collects personal information for purposes such as:

Church administration

- maintaining appropriate church records;
- communicating with members, attendees and visitors;
- administering membership and participation;
- maintaining directories or contact lists where appropriate;
- coordinating volunteers and ministry teams;
- administering church programs, events and registrations;
- managing employment and volunteer relationships; and
- maintaining appropriate financial and legal records.

Ministry

- providing pastoral care;
- responding to prayer requests;
- providing discipleship and spiritual care;
- supporting children, youth and families;
- facilitating baptism, membership and other ministry processes;
- communicating ministry opportunities and information; and
- supporting the mission and ministries of Gracepoint.

Safety and legal obligations

- responding to emergencies;
- protecting children and vulnerable persons;
- administering appropriate screening processes;
- maintaining insurance and risk-management requirements;
- complying with legal, regulatory and charitable obligations; and
- protecting the rights, property and safety of Gracepoint and others.

We will not use personal information for a new purpose that is unrelated to the original purpose without appropriate consent or another lawful basis for doing so.

5. How We Collect Personal Information

Where practical, Gracepoint collects personal information directly from the individual to whom it relates.

Information may be collected through:

- registration forms;
- membership processes;
- volunteer applications;
- children's and youth ministry registration;
- event registration;
- online forms;
- email, telephone or other communications;
- pastoral conversations and ministry interactions;
- donations and giving;
- employment applications;
- criminal record screening processes;
- church management software;
- our website and other online services; and
- other ministry or administrative activities.

In some circumstances, information may be collected from another person, such as a parent or guardian registering a child, an emergency contact, a ministry leader, or a person authorized to provide information on another individual's behalf.

Gracepoint will make reasonable efforts to ensure that individuals understand the purposes for which their information is being collected.

6. Consent

Gracepoint generally seeks consent before collecting, using or disclosing personal information, except where applicable law permits or requires us to proceed without consent.

Depending on the circumstances, consent may be expressed or implied.

For example, when an individual voluntarily provides their email address to register for an event, it is generally understood that Gracepoint may use that email address to administer the event and provide information reasonably related to it.

However, Gracepoint does not interpret attendance at a church service, participation in a ministry or general relationship with the Church as blanket consent for every possible use of personal information.

Where a use is particularly sensitive or unexpected, Gracepoint will seek specific consent where appropriate.

An individual may withdraw consent to future collection, use or disclosure of personal information, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may affect Gracepoint's ability to provide certain services or ministry activities.

7. Children and Youth

Gracepoint recognizes that children and youth require particular care in the handling of personal information.

Information collected about children may include:

- name and age;
- parent or guardian information;
- emergency contacts;
- authorized pickup information;
- allergies or relevant medical information;
- accessibility or accommodation information;
- program participation;
- attendance;
- volunteer or leader information relevant to ministry administration; and
- photographs, video or other media.

Gracepoint collects this information only for appropriate ministry, administrative, safety or legal purposes.

Access to children's information is restricted to individuals who require it for their ministry or administrative responsibilities.

Parents or guardians may contact Gracepoint's Privacy Officer regarding the personal information held about their children, subject to applicable legal considerations.

Gracepoint will take reasonable steps to ensure that children's personal information is not unnecessarily disclosed or shared.

Detailed operational requirements for children's ministry information are addressed in Gracepoint's internal children's ministry privacy and safety procedures.

8. Pastoral Care, Prayer and Sensitive Information

Gracepoint recognizes that individuals may share highly personal information with pastors, ministry leaders, prayer teams or other designated caregivers.

Examples may include information concerning:

- family circumstances;
- relationships;
- grief and loss;
- spiritual struggles;
- personal crises;
- health or medical circumstances;
- financial hardship;
- addiction or other personal challenges;
- prayer requests; and
- other matters shared in confidence.

Gracepoint will make reasonable efforts to protect such information and will restrict access to those who have a legitimate ministry need to know.

Pastoral confidentiality is an important part of Christian ministry. However, confidentiality is not absolute. Information may need to be disclosed where required or permitted by law, where necessary to address a serious safety concern, or where disclosure is otherwise authorized.

Prayer requests intended for a public setting, prayer chain, service, newsletter, website or social media will be handled according to the applicable consent and ministry procedures.

Individuals should not assume that information shared with one pastor, staff member or volunteer will automatically be confidential from all other leaders. Where a person requires a particularly confidential conversation, they are encouraged to communicate that expectation clearly to the person receiving the information.

9. Photography, Video, Livestreaming and Audio

Gracepoint regularly uses photography, video and audio to communicate about and document the life of the Church.

This may include:

- Sunday worship services;
- baptisms;
- special services;

- children's and youth events;
- community events;
- ministry activities;
- testimonies;
- interviews;
- promotional materials;
- livestreams;
- sermon recordings; and
- Gracepoint's website and social media.

General photography or recording at public church gatherings may result in individuals appearing incidentally in photographs, video or livestreams.

Where practical, Gracepoint will provide notice when significant photography or recording is taking place and will make reasonable efforts to honour requests from individuals who do not wish to be prominently featured.

Gracepoint will seek specific consent, where appropriate, before intentionally featuring an identifiable individual in a testimony, interview, promotional story or similar content.

Particular care will be taken with photographs, video or other media featuring children and youth. Gracepoint will follow its children's ministry and media-consent procedures in determining when parental or guardian consent is required.

If an individual has a concern about a photograph, video or recording in which they appear, they may contact the Church's Privacy Officer.

10. Church Directories and Contact Information

Gracepoint may maintain directories or contact lists to facilitate communication and community among members and participants.

Personal information will not be included in a publicly accessible directory without appropriate consent or another lawful basis.

Individuals may choose not to have some or all of their contact information included in a church directory.

Church directories and contact lists are intended for legitimate church and ministry purposes. Individuals who receive access to them are expected to respect the privacy of others and not use the information for unrelated commercial, political, solicitation or other unauthorized purposes.

11. Volunteers and Ministry Leaders

Gracepoint relies on volunteers and ministry leaders and recognizes that some roles require access to personal information.

Volunteers and ministry leaders will be given access only to information reasonably necessary for their responsibilities.

Depending on the role, volunteers may be required to agree to confidentiality expectations and other privacy requirements.

Access to personal information will be removed or adjusted when a person's ministry responsibilities change or end.

Volunteers and ministry leaders must not:

- copy church information for personal use;
- download or retain information that they do not need;
- share church information with unauthorized people;
- use church contact information for personal commercial or political purposes; or
- disclose confidential ministry information outside the appropriate ministry context.

12. Criminal Record Screening

Certain employees and volunteers may be required to undergo criminal record screening because of the nature of their responsibilities, particularly where they work with children or vulnerable persons.

Gracepoint will collect and use screening information only for appropriate employment, volunteer, safety or legal purposes.

Where practical, Gracepoint will retain only the information necessary to demonstrate that an appropriate screening process has been completed rather than retaining unnecessary details of a criminal record check.

Access to screening information will be restricted to authorized individuals.

13. Donations and Financial Information

Gracepoint collects personal and financial information in connection with charitable donations and other financial transactions.

This may include:

- donor name and contact information;
- donation amounts and dates;
- payment information;
- charitable receipting information; and
- information required to administer donations and comply with legal and tax requirements.

Payment information may be processed by third-party payment providers rather than being stored directly by Gracepoint.

Gracepoint will use donation information for legitimate financial, charitable, administrative and legal purposes. Donor information will not be sold or rented to outside organizations.

Records will be retained in accordance with applicable legal, charitable, accounting and operational requirements.

14. Third-Party Service Providers and Cloud Services

Gracepoint uses third-party service providers to support its ministry and operations. These may include providers of:

- church management systems;
- online giving and payment processing;
- email and communications;
- website hosting;
- event registration;
- volunteer management;
- accounting and payroll;
- cloud storage;
- background screening; and
- other technology or professional services.

Some service providers may store or process personal information outside Canada, including in the United States or other jurisdictions.

Gracepoint remains responsible for the personal information under its control and will take reasonable steps to select service providers, configure systems and establish contractual or other safeguards appropriate to the sensitivity of the information.

Because Gracepoint's technology systems may change over time, this public policy does not attempt to provide an exhaustive list of all service providers.

Gracepoint maintains an internal record of significant service providers and the types of information shared with them.

15. Security of Personal Information

Gracepoint will use reasonable physical, technological and administrative safeguards appropriate to the sensitivity of the information.

Safeguards may include:

- password protection and multi-factor authentication;
- role-based access;
- restricted administrative privileges;
- secure storage;
- staff and volunteer confidentiality expectations;
- secure disposal of records;
- appropriate device and account security;
- limiting access on a need-to-know basis; and
- privacy training and procedures.

No method of storing or transmitting information is completely secure. Gracepoint cannot guarantee absolute security, but it will take reasonable steps to protect personal information against unauthorized access, use, disclosure, loss or destruction.

16. Retention and Destruction of Personal Information

Gracepoint will retain personal information only for as long as reasonably necessary for the purpose for which it was collected, for legitimate ministry or administrative purposes, or as required by law.

Some records may appropriately be retained for long periods because of their historical, legal, financial or ecclesiastical significance. Examples may include certain baptism, marriage, funeral, membership, charitable and corporate records.

Other information should generally be removed or securely destroyed when it is no longer required.

Gracepoint maintains internal records-retention practices that identify appropriate retention and disposal requirements for different categories of information.

When personal information is no longer required, Gracepoint will take reasonable steps to securely destroy, erase or de-identify it.

17. Accuracy of Personal Information

Gracepoint makes reasonable efforts to ensure that personal information is accurate and complete when it is used for a purpose where accuracy is important.

Individuals are encouraged to notify the Church when their information changes.

If an individual believes that personal information held by Gracepoint is inaccurate or incomplete, they may request that it be corrected.

18. Access to Personal Information

Subject to applicable legal exceptions, an individual may request access to personal information about themselves that is under Gracepoint's custody or control.

A request may also ask for information about:

- how the information is being used;
- the purposes for which it was collected; and
- the organizations or individuals to whom it has been disclosed, where applicable.

Requests should be made in writing to the Privacy Officer and should provide sufficient information to identify the records being requested.

Gracepoint will normally respond to an access request within the time required by applicable law, subject to permitted extensions and exceptions.

In some circumstances, Gracepoint may be unable to provide access to all requested information, including where the information contains another person's personal information, is subject to legal privilege, or falls within another legal exception.

Where appropriate, Gracepoint will provide access to the remainder of a record after removing information that cannot lawfully be disclosed.

19. Requests to Correct Personal Information

An individual may request correction of personal information held by Gracepoint if they believe it is inaccurate or incomplete.

Requests should be made to the Privacy Officer and should identify the information believed to be inaccurate or incomplete and the requested correction.

Gracepoint will review the request and take appropriate steps in accordance with applicable law.

20. Privacy Concerns and Complaints

Gracepoint encourages individuals to raise privacy concerns directly with the Church so that we have an opportunity to understand and address them.

A privacy concern or complaint should be submitted to the Privacy Officer and should include sufficient information to allow Gracepoint to investigate the matter.

Gracepoint will:

1. acknowledge the concern where appropriate;
2. investigate the matter;
3. consult relevant staff, leaders or service providers as necessary;
4. determine whether Gracepoint's privacy practices were followed;
5. take reasonable corrective action where appropriate; and
6. communicate the outcome to the individual, subject to legal or confidentiality considerations.

If an individual is not satisfied with Gracepoint's response, they may contact the **Office of the Information and Privacy Commissioner for British Columbia**.

21. Privacy Breaches

A privacy breach may occur when personal information is lost, stolen, accessed, used or disclosed without authorization.

Examples could include:

- sending personal information to the wrong person;
- losing a device containing church information;
- unauthorized access to a church database;
- accidentally sharing a children's list;
- unauthorized disclosure of pastoral information; or
- a service provider experiencing a security incident.

Anyone working or volunteering for Gracepoint who becomes aware of a possible privacy breach should notify the Privacy Officer or designated church leadership as soon as possible.

Gracepoint will take reasonable steps to:

1. contain the breach;
2. determine what information was involved;
3. assess the potential risk of harm;
4. mitigate the effects of the breach;
5. document the incident;
6. take corrective measures; and
7. determine whether affected individuals, the Office of the Information and Privacy Commissioner or another party should be notified.

Gracepoint maintains an internal privacy-breach response procedure for responding to suspected or confirmed breaches.

22. When Information May Be Disclosed Without Consent

There are circumstances in which Gracepoint may collect, use or disclose personal information without obtaining consent, where permitted or required by applicable law.

These may include circumstances involving:

- legal requirements;
- emergencies or threats to health or safety;
- investigations or legal proceedings;
- protecting Gracepoint's rights or property;
- fraud prevention or detection;
- professional advisers or service providers acting on Gracepoint's behalf; or
- other circumstances authorized by law.

Gracepoint will seek to limit any such disclosure to the information reasonably necessary for the applicable purpose.

23. Information About Other People

Gracepoint may sometimes receive information about one person from another person.

For example:

- a parent may provide information about a child;
- a spouse may provide family contact information;
- a volunteer may provide information about a ministry participant;
- someone may submit a prayer request concerning another person.

Individuals should exercise care when providing Gracepoint with personal information about another person and should provide such information only where they are authorized or have a legitimate reason to do so.

Gracepoint may need to limit access to information where providing access would reveal another person's personal information.

24. Church Membership and Religious Information

Gracepoint is a Christian church within the Mennonite Brethren family of churches.

Participation in church life may, by its nature, involve information concerning an individual's religious beliefs, church membership, baptism, ministry participation or spiritual life.

Gracepoint treats such information as personal information and will collect, use and disclose it only for appropriate church, ministry, administrative or legal purposes.

Church membership and participation records are not treated as permission for unrestricted disclosure of an individual's religious or personal information.

25. Social Media and Public Communications

Gracepoint may communicate through social media, websites, email, livestreams, newsletters and other public channels.

Individuals should understand that information voluntarily submitted for public communication may become publicly available and may be copied, shared or archived by others.

Gracepoint will use reasonable care when publishing personal information and will follow its media, photography and communications practices.

Gracepoint will not knowingly publish sensitive personal information about an individual for public communication without appropriate authorization, except where disclosure is otherwise permitted or required by law.

26. Changes to This Policy

Gracepoint may update this Privacy Policy from time to time to reflect changes in legislation, technology, ministry practices or organizational responsibilities.

The most current version will be made available through Gracepoint's website or other appropriate public communication.

The date of the most recent review or update will be identified at the beginning of the policy.

27. Contacting Gracepoint About Privacy

Questions, access requests, correction requests, privacy concerns and complaints should be directed to:

Privacy Officer

Gracepoint Community Church
3487 King George Blvd
Surrey, BC V4P 1B7
info@gracepoint.ca
604-538-1825

The Privacy Officer is responsible for overseeing Gracepoint's compliance with applicable privacy legislation and for responding to privacy-related questions and requests.

Individuals may also contact:

Office of the Information and Privacy Commissioner for British Columbia

947 Fort St, Victoria, BC V8V 3J4

28. Our Privacy Commitment

Gracepoint believes that protecting personal information is more than a legal obligation. It is part of our responsibility to treat people with dignity, respect and care.

We recognize that people entrust the Church with information about their lives, their families, their finances and, sometimes, their deepest struggles and hopes.

We therefore seek to handle personal information with wisdom, discretion and integrity.