

**PROTECTING PERSONAL INFORMATION
PRIVACY POLICY PRINCIPLES & BEST PRACTICES**



Effectiveness & Efficiency - Going Forward

Communications Committee
Grand Lodge of A.F. & A.M. of Canada in the Province of Ontario

Version 4 – February 2018

INTRODUCTION

Fidelity & Integrity

Our gentle Craft has been in existence for centuries with the first recorded Masonic presence in Canada dating back to 1634, with our own Grand Lodge being established in 1855.

In this day and age, we have a responsibility to ensure that any personal information of our membership that we are entrusted with, is stored safely, managed in a professional manner and that appropriate confidentiality can be assured. The Grand Lodge has issued a Protecting Personal Information Policy.

Types of Information Collected and Why

In the course of someone applying to become a member of the Craft, during the time they are Members in good standing and after they withdraw from membership, we collect and use three types of information: personal, non-personal, and anonymous.

Personal Information

This information identifies the member or applicant specifically. Examples are name, date of birth, first name of their companion, names of their children, occupation, home address, home and business telephone numbers and email address.

Non-Personal Information.

This information includes the Masonic rank of the member, Grand Lodge / District / Lodge positions held, etc.

Anonymous Information.

Anonymous information includes, information from surveys to measure how well we are preserving and advancing Ancient Freemasonry in our Lodges, Districts and/or Grand Lodge, used to develop Grand Lodge programs to assist in maintaining and furthering the Craft, and to overcome recognized deficiencies.

In Masonry we collect and use this information for our records, to distribute information and news to the membership and to provide other recognized Masonic orders with confirmation of good standing membership.

OUR COMMITMENT TO OUR MEMBERS

In the Grand Lodge and its constituent Lodges, we have always been sensitive to privacy issues and to the ongoing trust that our members place in us. In respect to the privacy of our members we follow **Ten Privacy Principles**, to set the standards on how the personal information of our members and perspective members is handled, as delineated below.

All members of our Grand Jurisdiction at the Grand Lodge, District and Lodge levels must be knowledgeable of the Privacy Policy and understand how to best apply these principles as they perform the duties of their respective office.

The Privacy Principles in this Strategy have been developed based on a number of best practices to assist Lodges, Districts and our Grand Lodge in protecting the personal information of our members, thus avoiding privacy concerns or complaints being raised.

PRIVACY PRINCIPLES

1. Accountability

Handling privacy concerns correctly improves the Craft's reputation. This Strategy, when properly applied, helps reduce the probability of the Craft becoming involved in a privacy dispute.

Under the guidance of the Grand Lodge Privacy Policy we are responsible for maintaining and protecting the personal information we collect, use and disclose at all Masonic levels.

2. Identifying Purpose

Before collecting or asking for information from an applicant, the recipient of the information shall explain to the member why we need the personal information being requested. The personal information is used to:

- Maintain the Lodge's record of their membership
- Maintain Grand Lodge's record of their membership, to issue summonses and dues invoices;
- Be able to address their companion by name
- Generally keep in contact.

3. Consent

The member gives his consent to the collection of personal information when, as an applicant, he completes and signs the Application for Initiation agreeing and consenting to the transmission of his name, address, age, occupation and any other personal information set out in the Application form, by email or any other electronic means.

Sometimes further consent is required. If the Lodge, District and/or Grand Lodge have been requested to provide personal information to an entity outside the Craft, the member will be required to give his written consent prior to the information being released.

4. Limiting Collection

Only personal information that is needed to conduct our business will be collected. Examples of our business requirements may be to summon, to collect dues and fees, to report to the District and Grand Lodge. Generally this would seem to be name, address, email address, date of birth of applicants, their occupation and any previous addresses if he has not been at the current address for a year. Note that although the address is required by a Lodge for mailing purposes and Grand Lodge to clear an application, in accordance with the Book of Constitution when informing brethren in the Summons of a ballot it is only necessary to identify the residence (i.e. municipality) of the applicant.

We must also remember that privacy of a member's employment information is equally important and due to the exigencies of particular jobs it may be necessary to not publish a home address or telephone number. In such cases the applicant can provide his work address and phone number as contact information.

5. Limiting, Use, Disclosure & Retention

With the exception of the Grand Lodge Semi-annual Return and Return of Officers following Installation, when a Lodge receives a request for personal and/or non-personal information on one of its members, from anyone including other concordant Masonic bodies, the Lodge shall immediately inform the member of the request, including who is making the request. If the member is willing to have the information

released, he shall give his consent in a short signed note, releasing the Lodge to disclose the requested information.

In terms of the length of time personal information should be kept, the basic information must be kept indefinitely as someone can become “no longer a member” when he has demitted either in good standing or dues owing, or been suspended. The personal information on these Masons must be maintained in case he wishes to be reinstated.

Even when a member passes to the Grand Lodge Above, his basic information must be retained by his Lodge as in many cases, family members request Masonic information about their loved one from our records. The basic information includes (e.g. Masonic Rank, when particular offices were held, dates of birth, initiation/affiliation, passing, raising and passing to the Grand Lodge Above).

6. Accuracy

We take steps to make sure our members’ information is accurate, complete and up-to-date. It is recommended that Lodge Secretaries review and update the personal information held by the Lodge at least every two years.

7. Safeguards

The Grand Lodge Office, as the central repository for record keeping for the jurisdiction, must at all times ensure that printed records are secured outside of business hours and that records compiled on a database are secured by passwords.

The Lodges of the jurisdiction shall have their own central repository for record keeping and must at all times ensure that printed records are secure when not in use and that records compiled on a database are secured by passwords.

The easiest way to limit who gets access to a member’s information is on a “need-to-know basis.” Grand Lodge, Districts and Lodges must ensure that only those members that need to use a member’s information to do their job or assigned task (e.g. to conduct a Committee of Inquiry) receive the information

Securing or storing personal information from prying eyes is achieved by those holding the information ensuring that the information is not left open for anyone to browse through. In addition, computer systems which hold personal information must be adequately protected with safeguards such as passwords.

Technologies change rapidly therefore these security measure requirements shall be reviewed and updated regularly.

If the Lodge uses an electronic means of collecting payment it must ensure that the system truncates (“x” out) payment card numbers on the member’s receipts.

Lodges have an obligation to inform other Lodges in their general vicinity of items of great confidentiality. For example, Lodges have an obligation under Section 321 of the Book of Constitution, to notify the Grand Secretary and all Lodge Secretaries in their District, of an unfavourable Committee of Inquiry Report or unfavourable ballot. Great caution must be taken to ensure that this is accomplished via a secure means of notification. Should, for example, that means of communication be via email the moment that it is distributed in that manner it is potentially in the public domain and if that information becomes public knowledge, possible allegations of slander could arise. Lodge Secretaries must circulate that information via surface mail Secretary-to-Grand Secretary and Secretary-to-Secretary whenever possible.

Grand Lodge, Districts and Lodges publish summons and newsletters on a regular basis, which include a great deal of information and pictures thus they require special consideration.

Publishing Photographs

Before taking pictures after a meeting, celebration, reception or other event that will be displayed on a website, social media, newsletter or magazine, the photographer must ask if anyone does not wish their picture published and ask them to leave the photo.

Use of Addresses & Contact information on District Trestle Boards & Lodge Summons

District Trestle Boards and Lodge Summons are in print and electronic form and by their very nature may possibly be in the public domain therefore specific best practices must be used in each designated instance and they are as follows:

Grand Master, Deputy Grand Master and Grand Secretary

It is recommended that these three positions be listed on District Trestle Boards and Lodge Summons one under the other in sequence: Grand Master; Deputy Grand Master; and Grand Secretary. No address or contact information is to be included for the Grand Master or Deputy Grand Master; however, the Grand Secretary's entry must include the business address, telephone number and email address for the Grand Lodge Office.

District Deputy Grand Master and District Secretary

It is recommended that, on the District Trestle Board, only their name, rank, municipality (no actual address) and email addresses be included. If the District Deputy Grand Master and/or District Secretary wish to include their mailing address and telephone number it is at their own discretion.

Worshipful Master and Lodge Secretary

It is recommended that, on the Lodge Summons, only their name, rank, municipality (no actual address) and email addresses be included. If the Worshipful Master and/or Secretary wish to include their mailing address and telephone number it is at their own discretion.

Use and Safe Storage of Personal Email Addresses

Many members do not wish to have their email addresses show up as part of a distribution list on bulk emails. It is recommended that all District and Lodge Secretaries make use of the "BCC" capability to limit who sees the email addresses. This is achieved by the sender having his own address in the "To" address box and putting the distribution list in the "BCC" address box.

Under the direction and control of the Board of General Purposes there are a number of strategic plan committees, all of which have multiple Committees and/or Teams within them. The membership of these committees is subject to change annually and the current list is published annually in a confidential document by Grand Lodge. In order to maintain that confidentiality and minimize the potential for the various committee member's personal emails becoming common knowledge, it is recommended that Grand Lodge domain email addresses be maintained for the strategic plan committees. In addition, distribution of emails received at these addresses, would be controlled by the appropriate strategic plan committee chairman.

Email addresses are commonly shown on District Trestle Boards and Lodge Summons for the District Deputy Grand Master, District Secretary, District Committee Chairmen, Worshipful Master, Lodge Secretary and Lodge Committee Chairmen; in an effort to minimize the potential of these member's personal email addresses becoming common knowledge; Districts and Lodges are strongly encouraged to use generic email addresses to safeguard these positions personal information. The District and Lodge domain email addresses would need similar controls to those of the Grand Lodge domain email addresses.

Use and Safe Storage of Credit or Client Card Information

Electronic means of paying for services and items is a commonplace occurrence for a good portion of the population. Some Lodges have begun using electronic money transfers.

When the Grand Lodge Office and constituent Lodges utilize electronic means of payment they must be fully aware of the privacy policies of the payment service provider. Caution shall be taken to ensure that when this type of service is transacted, it is on a secure "https" site.

8. Openness

Information about Grand Lodge's privacy policy and practices is openly available on the Grand Lodge web site through:

- On the Public Access portal - Respecting the Privacy of Our Membership brochure;
- On the Members Access portal:
 - Protecting Personal Information Policy;
 - Strategy of Privacy Principles; and
 - Handling Privacy Complaints.

9. Individual Access

Members have access to any personal information of their own, and they can request that it be amended if necessary.

A member wishing to confirm his personal information will request access from his Lodge Secretary for the information. Any changes that the member makes to his personal information shall be passed on to the Grand Lodge Office and the Secretary(s) of any other Lodge in which he is a member.

10. Providing Recourse

The Privacy Officer has been tasked by the Grand Master to receive, review and adjudicate any privacy complaints arising from our members. The Privacy Officer operates at arm's length from the respective governance entity (Grand Lodge, District or Lodge) against whom the complaint has been raised. The Discipline Committee shall maintain a single electronic point of contact, using the Privacy Officer domain email address.

The Privacy Officer is responsible for receiving, reviewing and adjudicating any Privacy complaints submitted by the membership to ensure all responses are done so in a consistent and confidential manner.

A privacy complaint may be submitted by any member of the Craft within our Grand Jurisdiction. To ensure confidentiality, privacy complaints shall be submitted to Privacy Officer using Registered Mail, to Grand Lodge Attn: Privacy Officer.

Details on how the Privacy Officer handles a privacy complaint and his responsibilities for informing Grand Lodge on such activities are delineated in the Handling Privacy Complaints publication.

TRAINING

Grand Lodge's Privacy Policy is a critical tool to safeguard our members' personal information. Our members must be aware of these Privacy Principles, understand the reasons for collecting information and the circumstances under which we may and may not collect, use or disclose that information.

Our members must be aware of these Privacy Principles. We must train our members to speak openly with applicants about our organization's reasons for collecting personal information and the plans for the specific use of that information.

The Privacy Principles are mostly common sense however, information about protecting personal information must be incorporated into our standard training programs, such as Lodge Secretary's Course, DDGM Orientation sessions, District Secretary programs and other such training sessions.

Determining who Requires Training

The following are members of our Grand Jurisdiction who by virtue of their elected or appointed position must be knowledgeable, capable of implementing and ensuring that the personal information of our members is properly protected. This list is dynamic and subject to updating when required as circumstances change:

Lodges

In the Constituent Lodges, this includes those Officers or Members who deal directly with a member's collected information.

Districts

In the Districts, this includes those responsible for maintaining electronic distribution lists.

Grand Lodge Committee

In Grand Lodge Committees, this includes those responsible for maintaining electronic distribution lists.

Grand Lodge Office

In the Grand Lodge Office, this includes those Officers or Members who deal directly with a member's collected information.

REVIEW & UPDATING PROCESS

These **Ten Privacy Principles** must be viewed as a living document one that is constantly being monitored to ensure that it meets the needs of changing circumstances and situations. It will be reviewed on an annual basis by the Grand Lodge Communications Committee until it is determined that the period between reviews can be extended.

ADDITIONAL INFORMATION

While it is not possible to anticipate every question that an applicant or member will ask, additional information to assist both applicants and members in understanding our Best Practices is available. This takes the form of a Brochure outlining our ten privacy principles and a Frequently Asked Question (FAQ) sheet, each available on the Grand Lodge web site.