

CANADIAN LUTHERAN WORLD RELIEF PRIVACY POLICY

Canadian Lutheran World Relief ("CLWR") is committed to protecting the privacy of the personal information which we collect and hold from our volunteers, donors, potential supporters and other stakeholders. This Policy outlines the way that CLWR collects, uses, retains, safeguards, discloses and disposes of the personal information it needs to carry out its work.

CLWR takes the protection of your privacy and this Privacy Policy seriously. CLWR adheres to the privacy principles outlined in the *Personal Information Protection and Electronic Documents Act* (the "Act") in the collection, use and maintenance of the personal information we collect.

CLWR's Privacy Policy is based on the following principles:

Accountability

CLWR is responsible for maintaining and protecting your personal information under our control and as such we have implemented policies and procedures to give effect to these principles and deal with your inquiries. In this regard, we have appointed a staff person (the "Privacy Officer") whose responsibilities will include those of the implementation and monitoring of CLWR's Privacy Policy (the "Privacy Policy"). The Privacy Officer will be responsible for CLWR's compliance with the privacy principles described in this Policy. This person will also be responsible for responding to inquiries and access requests in accordance with this Policy. The Privacy Officer may at his/her discretion enlist assistance from other staff members and/or volunteers within our organization.

CLWR will implement internal policies, which will facilitate adherence to this Privacy Policy including but not limited to the following:

- Security measures at all levels designed to protect personal information in our possession;
- Training our staff and volunteers to follow our data management procedures; and
- Implementing procedures designed to respond to complaints and/or inquiries.

Identifying Purposes

Personal information is very broadly defined by the Act to include any information that could specifically identify you. At CLWR, your personal information is generally collected, used and/or disclosed so we can process donations, comply with Canada Revenue Agency requirements, distribute publications, distribute resource information, for resource

production and for administrative purposes. We shall only collect personal information that is reasonably necessary to fulfill these purposes. This type of information would include, but is not limited to your name, address, contact information and credit card information (for donation purposes only). CLWR also accepts donations online using a secure third-party payment gateway provider. We hold our payment gateway provider to the same standards as we apply to ourselves in relation to the protection of personal information.

Your personal information may be collected, used or disclosed for any of the purposes set out above. CLWR will not otherwise collect, use or disclose your personal information without obtaining your consent, unless CLWR is required or authorized to disclose the information by law.

We have made best efforts to explain the purposes for which we ask for your personal information, but if you have any questions about why certain data elements are requested or what happens to that information, please do not hesitate to ask, at privacy@clwr.org.

In the event CLWR wishes to use your personal information for a new purpose, we will seek a new consent. CLWR does not rent, sell, or trade mailing lists or other personal information.

Consent

By providing your personal information to CLWR, you are deemed to consent to our collection, use and disclosure of the information for the purposes identified in this Privacy Policy. Your consent may be withdrawn by you at any time by providing electronic or written notice to us. However, if you withdraw your consent we will not be able send you any further information about our organization. It is understood that a withdrawal of consent shall not affect any existing obligations or past activities where CLWR had relied on a consent.

CLWR may collect personal information without consent where reasonable to do so and where permitted by law.

Limiting Collection

All personal information shall be collected fairly and lawfully. Wherever possible, we collect your personal information directly from you. CLWR will not use any form of deception in gaining your personal information.

CLWR shall not indiscriminately collect information. The amount and type of information we collect shall be limited to that which is required to fulfill our identified purposes. We are responsible for your personal information that is under our control. We will keep this

personal information in our records in accordance with prudent business practices and protect it in accordance with the Safeguards described in this Privacy Policy.

Limiting Use, Disclosure and Retention

Subject to applicable legislation, CLWR shall limit use of your personal information to the purposes identified in this Privacy Policy.

CLWR shall maintain documents and disclose them as necessary. More specifically:

- (i) CLWR may disclose a donor's name by publishing the name and donation amount online at www.clwr.org or in CLWR's Partnership Newsletter (unless the donor has specifically requested to remain anonymous), though generally individual names are not published with corresponding donation amounts.
- (ii) CLWR may disclose personal information to our affiliated organizations. Our affiliated organizations are the Evangelical Lutheran Church in Canada and the Lutheran Church–Canada.
- (iii) CLWR may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where CLWR has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.

At any time that we are required to disclose your personal information, we will disclose only as much of the information as is required to meet the purpose of the disclosure.

CLWR will retain your personal information only as long as we need it to effectively serve the purposes set out in this Privacy Policy and for a reasonable length of time thereafter. However, certain documents may be subject to legislated retention periods either federally or provincially and these will be respected at all times by CLWR.

Accuracy

CLWR strives to ensure to the extent it can that your personal information is accurate and up-to-date. Please contact our Privacy Officer at privacy@clwr.org to advise of any changes to your personal information.

Safeguards

You have the option to communicate with or donate to CLWR in a variety of ways, including through our web site and through email correspondence. While we have taken all reasonable steps to ensure data transmission to us over the Internet is secure, we can not guarantee security. As a result, we do not represent, warrant or guarantee the security of any personal information transmitted to us through our web site or that the personal information will be protected against disclosure, misuse or alteration and we do not accept any liability for personal information submitted to us until that personal information is received by us. However, once we receive your personal information, we use appropriate safeguards to ensure the protection of the personal information submitted to us through our web site or emails is carried out in a manner that is consistent with this Privacy Policy.

Security safeguards have been implemented to ensure personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof. The following are some of the steps CLWR has taken to protect your personal information:

1. Ensuring the premises where your personal information is physically stored are secure;
2. Restricting access to your personal information to CLWR employees and volunteers on a need to know or need to use basis; and
3. Implementing passwords and other security measures.

CLWR's Policy

CLWR is required to make information available to you concerning the policies and the practices that apply to the management of your personal information. This information is readily available through our website at www.clwr.org or by contacting our Privacy Officer at privacy@clwr.org.

Access to your Personal Information

You are entitled to access your personal information collected, used and/or disclosed by CLWR. Subject to applicable legislation, we will provide you with access to your personal information within a reasonable period of time upon your written request. You also have certain rights to know which third parties have received your personal information from CLWR.

When a request is made, CLWR will disclose whether or not we actually hold your personal information. We shall also disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

We will correct any inaccurate information that is brought to our attention as soon as reasonably possible and any pertinent third parties shall be apprised of the corrections in due course.

Inquiries

CLWR, in accordance with the Act, has appointed a Privacy Officer to ensure the principles and procedures set out herein are adhered to by CLWR. Should you have any questions or inquiries, please contact our Privacy Officer at privacy@clwr.org or at the address set out below.

If you have a complaint related to this CLWR Privacy Policy or any of our personal information management practices, please contact our Privacy Officer. If your complaint is found to be justified, we will take the steps necessary to resolve the complaint, including, if necessary, amending our policies and practices to ensure compliance in the future.

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