

## **CANADIAN LUTHERAN WORLD RELIEF PRIVACY POLICY**

Canadian Lutheran World Relief (“CLWR”) is committed to protecting your personal information which we collect and hold. This Policy outlines the way that CLWR collects, uses, retains, safeguards, discloses and disposes of your personal information.

CLWR will adhere to all relevant federal and provincial legislative privacy requirements. CLWR will strive to meet or exceed the privacy standards established by Canada’s *Personal Information Protection and Electronic Documents Act* (the “Act”) and will ensure that it remains current with changing technologies and laws.

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

### **Accountability**

CLWR is responsible for maintaining and protecting your personal information under our control. In this regard, we have appointed a staff person (the "Privacy Officer") whose responsibilities include implementation and monitoring of CLWR’s Privacy Policy (the “Privacy Policy”). The Privacy Officer is also responsible for CLWR’s compliance with privacy principles and 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 has implemented 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; and
- Implementing procedures designed to respond to complaints and/or inquiries.

### **Identifying Purposes**

Personal information includes any information that could specifically identify you. At CLWR, your personal information is generally collected, used and/or disclosed so we can process donations, distribute publications, distribute resource information, for resource production and for administrative purposes. We 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 and retail purposes only).

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 required or authorized by law.

### **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 written notice to us. However, if you withdraw your consent, we will not be able send you any further information about our organization.

### **Limiting Collection**

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

CLWR does not indiscriminately collect information. The amount and type of information we collect is 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**

CLWR limits the 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](http://www.clwr.org) or in CLWR's Partnership Newsletter, 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 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. CLWR will respect legislated retention periods either federally or provincially at all times.

### **Accuracy**

CLWR strives to ensure to the extent it can that your personal information is accurate and up-to-date. Please contact us 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 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 on a need to know or need to use basis; and

3. Implementing passwords and other security policies.

### **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](http://www.clwr.org) or by contacting our Privacy Officer.

### **Access to your Personal Information**

You are entitled to access your personal information collected, used and/or disclosed by CLWR. We will provide you with access to your personal information within 45 days 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**

Should you have any questions, inquiries or 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 justified, we will take the steps necessary to resolve the issue, including amending our policy and practices to allow for compliance in the future.

Canadian Lutheran World Relief  
600-177 Lombard Ave  
Winnipeg MB R3B 0W5

Maxine Kashton, Privacy Officer

Phone: (204) 694-5602  
Email: [maxine@clwr.org](mailto:maxine@clwr.org)  
Internet: [www.clwr.org](http://www.clwr.org)

If you are not satisfied with our response you may file a formal complaint with the Privacy Commissioner in your province or the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner  
30 Victoria Street  
Gatineau, Quebec  
K1A 1H3  
1-800-282-1376