

## Complete Privacy Policy

### Introduction

Welcome to Lutheran World Relief's privacy notice. Lutheran World Relief (hereafter referred to as "LWR", "we", "us" or "our") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website ([lwr.org](http://lwr.org)) and tell you about your privacy rights and how the law protects you. This privacy notice (hereafter referred to as "notice") is provided in a layered format, so you can click through to the specific areas set out below. Alternatively, you can download a [pdf version of the policy](#). Please also use the [glossary](#) to understand the meaning of some of the terms used in this privacy notice. This Privacy Policy sets out how we obtain, use and protect personal information and contains the following sections:

- Important information and who we are
- The data we collect about you
- How is your personal data collected?
- How we use your personal data
- Disclosures of your personal data
- International transfers
- Data security
- Data retention
- Your Legal Rights
- Glossary

### Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to give you information on how LWR collects, processes and uses your personal data through your use of this website. This includes any data you may provide through this website when you create an account, sign up for our newsletters, join our mailing list, make a donation, apply for a job, or engage with us in any other way that requires your identification, contact information, and financial details/payment transaction verification. It is important that you read this privacy notice together with any other supplementary privacy notice or fair processing we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. Any other notice(s)

provided by LWR is a supplement to this notice and not intended to override or replace this notice.

## Controller

Lutheran World Relief (LWR) is the controller of your personal data. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this Privacy Policy, please contact the DPO using the details set out below.

## DPO Contact details

Full name of legal entity: Lutheran World Relief

Name or title of DPO: Greg Kresslein, Associate Director, Visual Design and Web Strategy

Email address: [data-privacy@lwr.org](mailto:data-privacy@lwr.org)

Postal address: 700 Light Street. Baltimore, MD 21230, USA

Tel: (800) 597.5972 For our EU Constituents: You have the right to make a privacy complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance. All other website visitors: please contact the DPO listed above

## Changes to the privacy notice and your duty to inform us of changes

This version was last updated on February 6, 2024. We may update this notice from time to time. When we do, we will post the current version on this site, and we will revise the version date located here. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You may update, correct, or change your information by contacting us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. Your interactions with these sites are governed by the third parties' applicable privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## The data we collect about you

We collect your personal data, meaning any information about you from which you can be identified, when you voluntarily provide it to us. Personal Data does not include data where the identity has been removed (anonymous data). We may collect, use, store or transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, affiliated church body (always optional) and Thrivent member affiliation (always optional).
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about donations you have made to us; or engagements you have had with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, donations made by you, orders made by you, your interests, preferences, feedback, survey responses, and your affiliated church/congregation (optional).
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us, our third parties, and your communication preferences.
- **Other Data** you submit via forms, surveys, or other interactive portions of our site.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not intentionally collect any **Special Categories of Personal Data** about you without your explicit consent for one or more specified purposes or as permitted or required by applicable law. xx This includes details about your race or ethnicity,

religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform any requested services. In this case, we may have to cancel a donation made, product, or service you have with us, but we will notify you if this is the case at the time.

## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - give a donation/gift;
  - apply for or purchase our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
- **Technical Data from the following parties:**
  - analytics providers (such as, but not limited to, Quantcast, based outside the EU);
  - advertising networks (such as, but not limited to, Google, based outside the EU); and
  - search information providers (such as, but not limited to, Google, based outside the EU).
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services (such as, but not limited to, Authorize.net, based outside the EU).

- Identity and Contact Data from data brokers or aggregators (such as, but not limited to, Raiser’s Edge, based outside the EU).

## How we use your personal data

- We will only use your personal data if we have one or more legal bases for doing so. Most commonly, we will use your personal data in the following circumstances:
  - Where the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
  - Where processing is necessary to perform the contract, we are about to enter into or have entered into with you;
  - Where processing is necessary in order to protect the vital interests of the data subject or of another natural person;
  - Where processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
  - Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new constituent or interested support	(a) Identity (b) Contact	Necessary for our legitimate interests
To process a donation/gift made by you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract/purchase/donation with you (b) Necessary for our legitimate interests (to recover debts due to us)

To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract/purchase/donation with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage and foster our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract/purchase with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract/purchase with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Marketing and Communications	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we

decide which services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us with your consent, made a donation, engagements with us, orders placed with us, or if you provided us with your details when you entered a competition, or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

To serve people in need around the world, LWR may occasionally share our mailing lists with other nonprofit organizations. To opt-out of such sharing, [please contact us](#) at any time.

For our EU Constituents: We will not share your personal data with any company outside LWR for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

### Cookies

We use cookies when you visit certain pages online to record your preferences to enable us to improve services for you. We may also use cookies to monitor traffic and improve the Website. However, if you wish to restrict or block the cookies which are set by the LWR website you can do this through your browser settings. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, [please see our cookie policy](#).

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Where we are relying on consent as the legal basis, we will notify you and seek additional consent before using your personal data for a new purpose that is inconsistent with the original purpose for which we collected it. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the glossary. We require all third parties (both internal and external) to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International transfers

For our constituents based in the European Economic Area (EEA), your personal data will be available across LWR which may involve transferring your data outside the European Economic Area (EEA). We ensure your personal data is protected by requiring all third parties involved in transferring to follow the same rules when processing your personal data.

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

When applicable, whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- We use providers based in the US, and transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.



## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed, but note, no transmission of data via the internet is ever completely secure or error free. Please use caution when submitting information through any website or email. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **CREDIT CARD TRANSACTIONS**

We are PCI-DSS Compliant Level 2. Maintaining PCI compliance requires that we engage in ongoing activities that include, but are not limited to, build, and maintain a secure network, protect sensitive data, maintain a vulnerability management program, implement strong security measures, and regularly test and monitor networks and systems. Additionally, our computing providers have undergone SOC 2 compliance.

## Data retention

### **How long will you use my personal data for?**

- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- Details of retention periods for different aspects of your personal data are available by [contacting us](#).
- In some circumstances you can ask us to delete your data: see Section 9 below for further information.
- In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your Legal Rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- You have right to access personal information that LWR holds about you.
- You have a right to request us to correct your personal information where it is inaccurate or out of date.
- You have the right, under certain circumstances, to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.
- You have the right to object to the processing of your personal information at any time, on legitimate grounds, except if otherwise permitted by applicable law, or to lodge a complaint with a supervisory authority. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
- You have the right to restrict the processing of your personal information, but only where:
  - its accuracy is contested, to allow us to verify its accuracy; or
  - the processing is unlawful, but you do not want it erased; or
  - it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
  - you have objected to processing of your data, and verification of overriding grounds is pending.
- You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) your consent; or (ii) the performance of a contract to which you are a party.

You have the right to withdraw consent at any time. If you wish to exercise any of the rights set out above, please [contact us](#).

**No fee required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Glossary

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**External Third Parties** means service providers acting as processors, meaning a natural or legal person, public authority, agency or other body which processes personal data on behalf of LWR, who provide IT and system administration services; Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. For a list of external third parties, please contact us.

**Internal Third Parties** means any subsidiaries of LWR not specifically mentioned in this Policy. For a list of LWR subsidiaries, please contact us.

**Lawful Basis or Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the

physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.