## **Privacy Policy**

#### 1. Introduction

- **1.1** Spirit Wheels Ministry is committed to protecting your privacy and will only use the information that we collect about you lawfully. This policy is designed to provide transparency into our privacy practices and principles and to inform you of the way your information is collected and used.
- **1.2** Please read the following carefully to understand our practices regarding your personal data and how we will treat it. BY USING OUR WEBSITE OR PROVIDING US WITH YOUR PERSONAL INFORMATION, YOU AGREE TO YOUR PERSONAL INFORMATION BEING USED AND STORED IN A MANNER SET OUT IN THIS POLICY. We may update this policy periodically so please check it regularly.

## 2. How we collect information about you

#### Information you provide us

- **2.1** We may collect information from you in the following ways:
  - (a) Our use of cookies (please see our policies regarding cookies in section 8);
  - (b) You make a donation to us, or respond to our mailings and appeals;
  - (c) You request information or materials from our organization:
  - (d) You contact us in relation to volunteering or fundraising on our behalf;
  - (e) You apply for a job with us, become an employee, or provide consultancy services directly to us; or
  - (f) You contact us with inquiries or other correspondence (including via social media) or become involved with us in another way.
- **2.2.** If you interact with us in one of the ways listed above, we may collect and process personal information about you such as:
  - (a) Your name, address, email address, telephone number, your age;
  - (b) Information you enter onto our website or other hard copy forms at an event;
  - (c) Records of your correspondence with us, if you have contacted us;
  - (d) Details of your visit to our website, including your IP address;
  - (e) Financial information such as your bank or card details;
  - (f) Whether you have a relationship to another supporter (e.g. husband/wife)

**2.3** We do not collect "sensitive personal data" about you, such as religious beliefs, genetic data, biometric data, data concerning health, unless there is a legitimate reason to do so. If we need to collect this type of data, we will obtain your consent or draw this specifically to your attention, so you understand what information is needed and why we need it.

#### Information we receive from other sources

- **2.4** Your information may be given to us by third parties, such as online tracking technologies. Collecting information in this manner allows us to collect statistics about our websites' usage and effectiveness and to personalize your experience while you are on our third-party websites (please see section 8 for more information regarding our use of online tracking technologies).
- **2.5** These third parties are subject to their own policies on data protection and privacy. It is a good idea to check their privacy policy when you provide your information to them to fully understand how they will process your data and may share it with others.
- **2.6** These third parties are often processing your data on your behalf so as the data controller, Samaritan's Purse is responsible for the security and proper processing of your personal data.

# 3. Why and how we use your information and on what basis

- **3.1** We will process your personal information in accordance with this policy and our obligations under applicable data protection laws and regulations, for one or more of the following reasons:
  - (a) To administer your purchase or donation;
  - (b) To confirm receipt of donation and to say thank you and provide details of how your donation might be used;
  - (c) To provide you with the services, activities or information you have indicated you want to receive or which you have asked for;
  - (d) To comply with applicable laws and regulations, and requests from statutory agencies;
  - (e) For our own internal administrative purposes and to keep a record of your relationship with us;
  - (f) For the purposes of research such as support satisfaction research;

- (g) For marketing purposes, to provide you with information about us, our fundraising campaigns, the opportunity to leave a gift in a will, our events, our services, and any other information, products, activities or services that we provide;
- (h) Where you have provided your consent to publish your personal data;
- (i) To provide you with information about volunteering opportunities;
- (i) To provide you with details about our campaigns;
- (k) To provide essential event information where you have signed up to attend;
- (I) To manage your communication preferences with us generally;
- (m) To provide you with information about goods and services we feel may interest you;
- (n) To notify you about changes to our services and/or donor opportunities;
- (o) To ensure that content from our website is presented in the most effective manner for you and for your compute/mobile device.
- **3.2** While we generally seek consent to process your data at the point we collect it, in some cases, we may process data without consent where we are legally allowed to do so, and where we have legitimate reasons for doing to, provided we respect your legal rights.
- **3.3** If you request to receive no further contact from us or request to have your personal data deleted from our system, we will keep some basic information in order to avoid sending you unwanted communications in the future. If we do not retain this information, then this could result in us contacting you again as we would no longer have a record of your request not to be contacted.
- **3.4** We will keep your personal data for no longer than is necessary for the purposes for which it is processed, in accordance with our internal policies.

## 4. Where we store your information

- **4.1** The information we collect from you will be stored in the U.S. . If we send your personal data outside the U.S. or other areas outside the European Economic Area (EEA), we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information. By submitting your details, you agree to this use of your data.
- **4.2** Online payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping the password confidential. We will not ask you to share your password with anyone.

**4.3** The transmission of information via the internet is not completely secure (though note that our online payment transactions are securely encrypted). Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorized access.

## 5. Who has access to your information?

- **5.1** Spirit Wheels Ministry may allow our staff, consultants and/or external providers acting on our behalf to access and use your information for the purposes for which you have provided it to us (e.g. to deliver mailings, for research, to analyze data and to process payments) or for the purposes set out in this privacy policy. We only provide them with the information they need to deliver the relevant service, or if it is relevant to their work, and we make sure your information is transferred securely and treated with the same level of care as if we were handling it directly.
- **5.2** We do not sell, rent, or lease your personal data to third parties for the purposes of marketing.
- **5.3** We may disclose your information to other organizations and agencies if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply any agreement; or to protect the rights, property, or safety of us or others.
- **5.4** In accordance with our commitment to protect vulnerable children from all forms of exploitation and abuse, we may share details, including personal data, relating to serious breaches of our Child Protection Policy and procedures with statutory authorities such as the police.

## 6. Your rights

- **6.1** To request details of the information we hold about you, to request that we no longer contact you or that you no longer wish to receive information from us, to update us on your contact details, or to change your preferences, simply let us know by:
  - (a) sending an email to Rick.Hohn@cox.net

- **6.2** Instructions for unsubscribing from emails will also be included in each email communication we send.
- **6.3** Under the General Data Protection Regulations (GDPR), which is expected to become law in the countries within the European Union (EU) in May 2018, EU citizens are granted a number of additional rights. These include:
  - (a) The right to correction;
  - (b) The right to erasure;
  - (c) The right to restrict processing;
  - (d) The right to data portability;
  - (e) The right to object;
  - (f) Rights in relation to automated decision making and profiling.
- **6.4** If you not satisfied with the way we have processed your personal data, please contact our data privacy representative(s) using the contact information set out in the introduction and section 6.1 of this policy. For those in the EU, if you are remain dissatisfied with how your complaint is handled, you can contact the Information Commissioner's Office (ICO) at <a href="https://ico.org.uk">https://ico.org.uk</a>. Alternatively, if you are located within the EU, you are entitled to make a complaint directly to the ICO without first referring your complaint to us.

#### 7. Cookies and how we use them

- **7.1** Like most websites, we use cookies. Cookies are pieces of information that a website places on the hard drive of your computer when you visit the website. Cookies do not harm your computer. Cookies may involve the transmission of information from us to you and from you directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use cookies to bring together information we collect about you. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to many features that make your guest experience more engaging and some of our services may not function properly.
- **8.2** We may use the following types of cookies and online tracking technologies:

- (a) Flash Cookies We may use local shared objects, sometimes known as Flash cookies, to store your preferences or display content based upon what you view on our website to personalize your visit. Third-party service providers with whom we contract also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. If you disable Flash cookies, you may not have access to many features that make your guest experience more engaging and some of our services may not function properly.
- (b) Persistent Cookies These types of cookies allow us to provide you with a smoother browsing experience while you navigate our websites. Persistent cookies also help our websites remember your information and settings whenever you visit them. These cookies remain on your hard drive until you manually erase them or they expire.
- (c) Web Beacons Web beacons are small pieces of data that are embedded in images on the pages of websites and emails. Web beacons may involve the transmission of information directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use web beacons to bring together information we collect about you.

#### 7.3 Third-party websites and social networks

• **8.3.1** If you click on a hyperlink from our website to any third-party websites (e.g. if you "share" content from our website with friends or colleagues on social media), you may be sent cookies from these third-party websites. They will do so pursuant to their own policies on privacy and cookies. It's a good idea to check their privacy policies to fully understand their use of cookies.

#### **7.4** Disabling cookies

- 7.4.1 By using our website, you consent to our use of cookies as updated from time to time and the cookies we use will be stored on your device (unless rejected or disabled by your browser).
- 7.4.2 Internet browsers normally accept cookies by default. However, it is
  possible to set an internet browser to reject cookies. If you do not accept our use
  of cookies as set out in this policy, please set your internet browser to reject
  cookies. This may impair your ability to use our website so that some features
  may not work.
- 7.4.3 We may update our use of cookies from time to time so please check this
  policy regularly.

## 8. Children's online privacy

**8.1** We are concerned about the privacy of young children, and we do not collect any more personal information than is reasonably necessary to enable them to participate in

the activities we offer on our site. We encourage you to become involved with your child's access to the Internet and to our site in order to ensure that his or her privacy is well protected. To read more about online safety and how to become more involved with your child's online experience, visit OnGuardOnline.gov.

## 9. How long do we keep your personal data?

**9.1** We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, Spirit Wheels Ministry takes into consideration data protection regulations, local laws, contractual obligations and the expectations and requirements based on the nature of the relationship with Spirit Wheels Ministry.

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