

# Lutheran Women's Missionary League

## Privacy Policy

- 1. Purpose of this Policy.** The Lutheran Women's Missionary League ("LWML", "we" or "us") is committed to your privacy. We take very seriously both (a) the privacy of information collected through use of our website, mobile applications, email, social media or through attendance at one of our meeting or events (collectively, the "Site") and (b) the security of user's personal information.

The purpose of this Privacy Policy is to explain the types of information LWML may gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of, and your ability to change or correct, the information. We ask that you carefully read this Privacy Policy in its entirety. By interacting with LWML through the Site, you consent to the use of information that is collected, submitted, or shared as described in this Privacy Policy.

LWML gathers and maintains a variety of user financial and personal information, which is stored in electronic and hard copy files. This information, may include, but is not limited to, personally identifiable information and financial data and transactions concerning donors, employees, members, friends, corporations, foundations, churches, affiliate organizations, missionaries, Site users, and other international partners.

Although some of the user information collected may be located in public records, other information may be proprietary, sensitive, and/or confidential. All national personnel and employees of the LWML are required to sign a confidentiality agreement, pledging their individual commitment to safeguard user's private personal information.

- 2. Types of Information Collected.** You may provide us with two types of information during your visit to the Site, namely, (i) anonymous or non-personally identifiable information, and (ii) personally identifiable information (or information concerning the identity and location of third parties) that you voluntarily provide to us or to our service providers who perform services for LWML.
  - (a) Anonymous or Non-Personally Identifiable Information.** When you visit the Site, LWML may automatically collect information from you, such as the search engine you used to access the Site, the previous websites you visited, the Site pages that you visited, the type of Internet browser you used, the computer operating system you used, and your computer's IP address. We may retain third parties to place and manage advertisements or other information on the Site. These third parties may use cookies and other technology to collect information about your visits to the Site in order to provide information about LWML and its ministry. This information is not personally associated with you, and we may share it with third parties from time to time.
  - (b) Personally Identifiable Information.** Personally identifiable information is information that identifies you, such as your name, postal address, telephone number, email address, age, date of birth, Paypal ID, credit card (or other financial account), and any other information that allows one to identify you or that becomes associated with your personally identifiable information. For example, you may need to provide personally identifiable information when you make a donation or sign up for an event, contact us with a question or concern, sign up to receive our emails, or participate in other activities when you visit the Site. We may also collect publicly available information about you from other sources, such as information from newspapers, blogs, and commercial websites or third party data aggregators; we may use such information to supplement your personally identifiable information maintained by us. We may also collect personally identifiable information that you voluntarily disclose on the Site, absent any request from us.

- 3. Examples of the types of information that may be collected include:**

- Name
- Mailing Address

- Email address
- Phone (or mobile) number
- Date of birth or age
- Driver's license number
- Credit/debit card number
- Purchase information
- Your mobile device information (*e.g.*, device model, operating system version, device date and time, unique device identifiers, mobile network information)
- How you use our sites and mobile applications, search terms, pages you visited on our sites and mobile applications, and application performance, as discussed further below.
- Geo-location and in-store location
- Facebook ID, profile picture, gender, age range, friends' IDs
- Google ID, profile picture

If you choose not to provide certain information, we may not be able to provide you with the requested items, services, or information.

**4. Automated Collection.** In order to provide the best guest experience possible, we and our third party service providers may also use automated information collection technologies that describe how you use and navigate the Site. For example, we may examine metrics such as how frequently you make online donations, use mobile applications or social media accounts, respond to our marketing efforts, the number and frequency of your visit to each web page and the length of your stay, as well as the anonymous information that your web browser automatically sends to us, such as browser/device/hardware type that you are using, purchase information, checkout process, search terms, referrer data that identifies the web page visited before and after your visit to the Site, and IP addresses. The collection of this information helps us recognize you, customize your experience on the Site and make our marketing messages more relevant. We also may determine what technology is available through your browser to serve you the most appropriate version of a web page. For example, we or our service providers may determine that you have installed a version of Flash, and we will then send to you the appropriate Flash version of the web page rather than an HTML page. In collecting this information, we and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with us through your computer or mobile device. We may also combine information collected automatically with other information that we already have about you in order to identify you as a donor to LWML or and to otherwise link all of your activity and interactions with LWML.

**(a) Cookies.** We or our service providers may use cookies. Cookies are information files that we or our service providers may send to your computer to provide extended functionality and to allow us (or our vendors) to collect anonymous data to track usage patterns, monitor activity, and administer the Site. Cookies let us "remember" information about your preferences and allow you to move about the Site without reintroducing yourself. We may use cookies for a number of purposes, such as tracking usage patterns on the Site, measuring the effectiveness of advertising, or limiting multiple responses and registrations. If there is an occurrence to create a login account on the Site, when you enter your user ID and password, we may use cookies to access, retrieve, or store your personally identifiable information, such as your password so you do not have to enter it more than once. You may disable cookies, receive a warning before a cookie is placed on your computer, and erase cookies from your hard drive through use of options or preferences menus in your browser. It is possible that some parts of the Site will not operate correctly if you disable the cookie feature. You should consult with your browser's provider/manufacturer if you have any questions regarding disabling cookies.

**(b) Log Data.** When you visit the Site, our web servers or those of our third party service providers may automatically collect anonymous information that describes how you use and navigate the Site. This information includes the number and frequency of your visits to each web page and the length of your stay, as well as the anonymous information that your web browser automatically sends to us, such as browser type, referrer data that identifies the web page visited before and after

your visit to the Site, and IP addresses. We also may determine what technology is available through your browser to serve you the most appropriate version of a web page. For example, we or our service providers may determine that you have installed a version of Flash, and we will then send to you the appropriate Flash version of the web page rather than an HTML page.

- (c) **IP Addresses.** An IP address is a number that is assigned to your computer or network when you are on the Internet. When you request pages from the Site, our servers or our vendor's servers may log your IP address. We or our vendors may also serve advertisements based upon the geographic location of your IP address.
  - (d) **Clear GIFs.** Clear GIFs or pixels are invisible files on web pages that you visit. When you visit a page on the Site that contains a clear GIF, the clear GIF communicates with your computer to determine, among other things, whether you have been to that page before or viewed a particular advertisement. We or our third party advertising providers or vendors may use clear GIFs to track usage of the Site.
  - (e) **Sharing of Information that is Automatically Collected.** We may allow third-party companies to collect certain information when you visit the Site. However, we do not share your information with other companies or organizations for the other companies' marketing purposes. All information collected by LWML or its third party service providers is for the benefit of LWML or your benefit while interacting with the Site or LWML.
5. **Mobile Location Information.** If you have downloaded one or more of our mobile applications, you can opt-in to location sharing for additional application capabilities. For example, geo-location will use your device's latitude and longitude or your device's location capabilities (*e.g.*, GPS or Wi-Fi) to let you find nearby LWML events or locations. You may opt out from allowing LWML to access location data by adjusting the permissions in your mobile device.
  6. **User Experience Information.** In order to improve guest online and mobile ordering experiences, help with fraud identification, and to assist our guest relations representatives in resolving issues that you may experience in completing online orders, we or our third party service providers may use tools to monitor certain user experience information; including login information, IP address, data regarding pages visited and ads clicked, specific actions taken on pages visited (*e.g.*, information entered during checkout process), and browser information.
  7. **Social Media Information.** LWML may engage with users on multiple social media platforms (*e.g.*, Facebook, Twitter, Instagram). If you contact us on one of our social media platforms, or request guest service via social media we may contact you via direct message. In these instances, your interactions with us are governed by this privacy policy as well as the privacy policy of the social media platform you use.
  8. **Social Media Widgets.** Our sites and mobile applications include social media features, such as the Facebook "Like" button and Twitter widgets. These features may collect information about your IP address and which page you're visiting on our site, and they may set a cookie or employ other tracking technologies. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with those features are governed by the privacy policies of the companies that provide them.
  9. **Information from Other Sources.** We may collect data that's publicly available. For example, information you submit in a public forum (*e.g.*, a blog, chat room, or social network) can be read, collected, or used by us and others, and could be used to personalize your experience or to assist LWML with its marketing efforts. You are responsible for the information you choose to submit in these instances.

We may also obtain information provided by third parties. For instance, we may obtain information from companies that can enhance our existing user information to improve the accuracy and add to the information we have about our users (e.g., adding address information). This improves our ability to contact you and increases the relevance of our marketing efforts by providing you with information that may be of interest to you.

**10. Third Party Advertisements and Operations.** We may allow our third party service providers to deliver advertisements on the Site or perform certain functions for us. The Site may also contain links to websites that are owned and operated by third parties. You should be aware that when you click on these third-party advertisements or links, you may deploy cookies or web beacons which third parties may use to identify some of your preferences or to recognize you if you have previously been to their website or otherwise had contact with them. Certain activities on the Site, such as a purchase, may be performed or sponsored by third parties or our service providers, and you will be asked to submit personally identifiable information to complete your transaction. **We do not control how these third parties use the information they collect from you, whether collected from the delivery of advertisements to you, your use of links, or your purchase of Goods or Services, or other voluntary submissions of information. We have no responsibility (and disclaim any representations, warranties or responsibility) for these third-party advertisements and websites, including, without limitation, their actions, policies, operations, terms of service, acts, or omissions, content, or privacy policies. You are responsible and agree to be solely responsible for learning and determining the acceptability of all such third party activities, actions, policies, privacy policies, operations, terms of service, acts or omissions, and any changes made or instituted by such third parties. We strongly encourage you to read the privacy policies and terms of use of these third party websites to learn how they may collect and use information about you.** If you voluntarily disclose personally identifiable information in a public area of the Site, such as a blog or message board or our Facebook page, third parties may collect this information and use it to send you unsolicited marketing communications, messages, or for other purposes.

#### **11. How Your Information Is Used.**

- (a) Financial Transactions, Communications, Event Sign Ups, Applications.** We use personally identifiable information for the purpose for which you provided it, which may include, but is not limited to, the acceptance of charitable donations, to process payments or refunds, to respond to request for information about our ministry, for event sign ups, volunteer, contractor, or employee applications, or to activate any online account you may establish through us or one of our third parties, and to allow you to participate in any public area of the Site that may be developed. We may also use personally identifiable information to notify you of changes to this Site, to provide you with news, emails, and other information related to our ministry, to let you know about other information and Services that may be of interest to you, and to otherwise tailor the Site to your preferences.
- (b) Website Analysis.** We may also combine anonymous usage information collected from your visit to the Site with that of other users to determine which features and areas of the Site are most popular. This aggregated information does not contain information personally associated with you.
- (c) Sharing with Affiliates, Service Providers, and Third Parties.** We use third party service providers to perform services on our behalf in connection with certain activities initiated on the Site. We may share the information we collect with companies that provide support services to us, such as email providers, mobile marketing services, analytics providers, web hosting providers, payment processors, product delivery vendors, data enhancement services, or fraud prevention providers. These companies may need information about you in order to perform these functions. These vendors may include companies, such as Vanco Services and Paypal for payment processing and *Google Analytics* for website traffic tracking, such as user page visits, location,

device site is accessed from and the like.<sup>1</sup> We may also use other, different vendors in the future. **You must be comfortable with the privacy policies of these third party vendors to whom you provide your personally identifiable information, as the privacy policies of those vendors will govern the use of your personally identifiable information once it has been transmitted to them. We strongly suggest you review the privacy policies of these vendors before providing information to them.** We may also update, supplement, share, and combine personally identifiable information collected from you with other information (including personally identifiable information) that we obtain from, or was secured by, third parties or by our subsidiaries, licensees, licensors, or affiliates. In addition, we may share information you provide us with third parties who provide services to us or distribute electronic communications to subscribers who choose to receive them. If we associate information obtained from our affiliates licensees, licensors, subsidiaries, or third parties with personally identifiable information collected by us under this privacy policy, we will treat the acquired information like information we have collected ourselves.

- (d) **Aggregated Information.** We may share aggregated information with third party service providers to assist us with collecting demographic information and improving our Site. We may also share aggregated information with potential advertisers, contractors, investors, and other third parties in connection with the sale, advertising, or marketing of our services.
- (e) **Social Networks.** If you are a member of a social network service, such as Facebook, Twitter, Instagram, or similar websites or services that you have authorized to gather information about your online behavior on the Site, including participation in any behavioral reporting program they may operate on or off of their own site, we may share information regarding your activities on the Site with such third parties, and they may associate and use that information with personally identifiable information they already have about you (such as your Facebook profile).
- (f) **Legal Requirements.** We may access, preserve, and disclose your account, personal information, and content, as well as report information of any type (including personally identifiable information) to law enforcement agencies, if we are required to do so by law or if we believe that such access, preservation, or disclosure is necessary or desirable for any of the following purposes: (a) to comply with a legal or regulatory process; (b) to enforce our terms of service and other agreements; (c) to respond to claims that any content violates the rights of third-parties; (d) to protect our rights, property, or personal safety, or that of our users or members of the public, (e) to deal with or report any activities that we, in good faith, believe to be unlawful, or (f) to facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or disposal of all or part of our business or assets; or to protect the rights property or safety of our company, our guests or others.
- (g) **Marketing Purposes.** We may use your information to deliver coupons, mobile coupons, newsletters, in-store receipt messages, emails, mobile messages, and social media notifications; provide interactive features of the Site or mobile applications, such as product reviews, advertisements, or send marketing communications and other information regarding products, services and promotions; or to administer promotions, surveys, and focus groups.
- (h) **Internal Operations.** We may use your information to improve the effectiveness of the Site, restaurants, mobile experience, and marketing efforts, conduct research and analysis, including focus groups and surveys, or to perform other business activities as needed, or as described elsewhere in this policy.

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<sup>1</sup> Are there other specific third party vendors you could list? For example, the vendor who hosts the Site or manages your email communications?

- (i) **Prevention of Fraud and Other Harm.** We may use your information to prevent fraudulent transactions, monitor against theft, and otherwise protect our guests and our business (*e.g.*, food safety concerns).
- (j) **Elsewhere at Your Direction.** At your direction or request, or when you otherwise consent, we may share your information. For example, if you post on our social media accounts and elect to make it available to the public, your information may be accessible on our website, mobile, or social applications.
- (k) **Sharing with Other Companies (for their marketing purposes).** LWML does not share your personally identifiable information with other companies or organizations for the other companies' marketing purposes. All personally identifiable information collected by LWML or its third party vendors is for the benefit of LWML and the users of its Site. However, we may share non-identifiable or aggregate information with third parties for lawful purposes.
- (l) **Business Transfers.** In connection with the sale or transfer of some or all of LWML assets, we may transfer or provide a copy of the information collected from you through your interactions with LWML or its third party service provider websites, mobile applications, social media sites, or our restaurants.
- (m) **Other Methods.** Where authorized by law and as permitted by FTC guidelines, we may use web beacons, other monitoring technologies, and third party service providers or vendors who may gather data for purposes of advertising or reporting website traffic and statistics.

**12. Safeguarding Personal Information.** LWML uses reasonable measures to ensure that the personally identifiable information you submit to us is secure. We also take reasonable measures to ensure that your information remains reliable, accurate, complete, and current. Unfortunately, no data transmission over the Internet is 100% secure. We will take reasonable measures, which we believe are appropriate to protect your personal information from loss, misuse, alteration, or destruction; however, we cannot ensure or warrant the security of that information. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse. Note that email is vulnerable to "Phishing," which is a scam designed to steal your personal information. If you receive an email that looks like it is from us asking you for your personal information, do not respond. We will never request your password, username, credit card information, or other personal information through email.

**13. Use of Links.** This site may contain links to other websites. LWML does not operate or control in any respect, or necessarily endorse, such websites, their sponsors, the content found on those sites, or the privacy or use of any information you provide on such other websites, and you assume sole responsibility for use of those links. LWML encourages and appreciates links from other websites to this website. You must obtain written permission before placing a link from another web page either (a) to the LWML opening page in its entirety ([www.lwml.org](http://www.lwml.org)), or (b) to a portion of an LWML website page (*e.g.*, a graphic). If you desire to link to the LWML website or include the LWML website in an index, please ask permission by sending your request to [webmaster@lwml.org](mailto:webmaster@lwml.org).

#### **14. What Choices Do You Have?**

- (a) **Postal Mail.** If you do not wish to receive mailings from LWML, please contact LWML through one of the methods provided below and provide us with your first and last name and complete mailing address and state your desire to no longer receive postal mail from us.

- (b) **Email.** If you have requested to receive emails from us and you wish to discontinue receiving LWML emails, you may unsubscribe to the emails by clicking on the unsubscribe link included in each LWML email.<sup>2</sup>
- (c) **Push Notifications.** You may at any time opt out from further allowing LWML to send you push notifications by adjusting the permissions in your mobile device.
- (d) **Copy of, Deletion, and Corrections of Personally Identifiable Information.** You may obtain a copy of your personally identifiable information in our possession by contacting us through one of the contact methods provided below. For your protection, you may be required to provide proof of your identity to obtain a copy of your personally identifiable information. You may correct any errors in your personally identifiable information in our possession by providing us with the correct information, and we will delete your personally identifiable information (except for your transaction history and any account and subscription information) from our records upon your written request. However, you may not be able to access some areas of the Site if you choose to delete your personally identifiable information. If you are or have been a purchaser, or have received any services or goods from us, we reserve the right to maintain archive copies of all communications and other documents in our possession concerning or related to you, including personally identifiable information.
- (e) **California Residents.** California Civil Code Section 1798.83 permits guests and customers who are California residents to request certain information regarding disclosure of personally identifiable information to third parties for their direct marketing purposes. If you are a California resident, you may make such a request by contacting us through one of the methods provided below. If you are a California resident under 18 years old and a registered user, you can request that we remove content or information that you have posted to the Site. Note that fulfillment of the request may not ensure complete or comprehensive removal (*e.g.*, if the content or information has been reposted by another user). To request removal of content or information, please contact us through one of the methods provided below.

- 15. Children.** Children are not eligible to use the Site and we ask that minors under the age of 13 not submit any personal information to us. The Site is not directed at anyone under the age of 13 and it is not intended to attract anyone under the age of 13. By creating an account or accessing the Site, you represent that you are at least 13 years of age. We do not knowingly collect or maintain personally identifiable information from individuals under the age of 13. Should we learn or be notified that we have collected information from users under the age of 13, we will immediately delete such personally identifiable information.
- 16. Use of text and images.** If you would like to publish information you find on our site, please ask permission by sending your request to [webmaster@lwml.org](mailto:webmaster@lwml.org). Copyrights exist on many Bible studies, devotions, text, and images posted on our site and we will respond to individual requests. Information about using the LWML logo and images is available here [www.lwml.org/logos-style-sheet](http://www.lwml.org/logos-style-sheet).
- 17. Your Consent.** By using our site, you consent to our use and disclosure of your personal information in the manner described in this Privacy Policy.
- 18. Changes to our privacy policy.** We may change this Privacy Policy from time to time based on changes in the law, your comments, or our need to accurately reflect our data collection and disclosure practices. If a change is made to this Privacy Policy, we will post those changes on this page. This Privacy Policy was last modified (May 20, 2016).

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<sup>2</sup> Make sure you have the unsubscribe link at the end of each of your emails.

**For more information**

If you have any questions or concerns about this Privacy Policy, or otherwise wish to contact us, you may do so via one of the below options:

Lutheran Women's Missionary League  
3558 S Jefferson Ave  
Saint Louis MO 63118

1-800-252-5965

[lwml@lwml.org](mailto:lwml@lwml.org)

[www.lwml.org](http://www.lwml.org)