

WACC POLICY

Data Privacy Policy

September, 2019

General

Privacy is important to the World Association for Christian Communication (WACC). This privacy policy provides information about the different types of personal information that we collect and the ways in which we use it. This privacy policy applies to all those who interact with us online (particularly through the website www.waccglobal.org and any other website we own or operate) or whose personal information we otherwise collect.

If you have any questions, please feel free to contact us using the contact details included at section 17.

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1. Who we are

This privacy policy describes how WACC will collect and use your personal information when you interact with us online or when we otherwise collect and use your personal information.

WACC is a not-for-profit corporation (438311-7) and an incorporated charitable organisation (number 83970 9524 RR0001) with its offices at 308 Main Street, Toronto ON, M4C 4X7.

WACC is also a UK Registered Charity (number 296073) and a Company registered in England and Wales (number 2082273) with its Registered Office at 16 Tavistock Crescent, London W11 1AP, United Kingdom.

The data protection regime in Canada is governed by the following four private sector privacy statutes: (i) the Federal Personal Information Protection and Electronic Documents Act (PIPEDA); (ii) Alberta's Personal Information Protection Act; (iii) British Columbia's Personal Information Protection Act; and (iv) Québec's An Act Respecting the Protection of Personal Information in the Private Sector (collectively, Canadian Privacy Statutes). While PIPEDA governs the inter-provincial and international collection, use and disclosure of personal information, it also applies to organizations that collect, use and disclose personal information during a commercial activity that takes place within a province. In addition to these four statutes, Canada has also enacted anti-spam legislation (CASL).

In the United Kingdom, the Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). Everyone responsible for using personal data has to follow strict rules called "data protection principles" that ensure that information is: used fairly, lawfully, and transparently.

2. When do we collect personal information about you?

We may obtain your personal information from a number of sources including:

- a. When you give it to us **directly**. For example, if you provide us with your email address to sign up to receive our news and information from WACC.
- b. When we obtain it **indirectly**. Your personal information may be shared with us by third parties such as recruitment agencies when we are recruiting staff or when we gather information on grant applicants. To the extent that we have not done so already and that we are required to, we will notify you when we receive personal information about you from them, and tell you how and why we intend to use that personal information.
- c. When it is **publicly available**. Your personal information may be available to us from external publicly available sources. This includes information available on government websites (e.g. U.S. federal and European institutions) or non-WACC company or institutional websites.
- d. When you visit our **website**. Our website uses cookies and other tracking technologies to improve your experience of our website—this can involve collecting personal information.
- e. Via **social media platforms**. Depending on your privacy settings for social media services, we may also access information from those accounts or service or when you interact with us on Facebook, Twitter or other social media accounts.

3. What personal information do we use?

We may collect, store, and otherwise process the following kinds of personal information:

- * your full name and contact details, including email address, postal address, and telephone number;
- * profile information and user name if you register on our website;

- * information you provide in connection with your application for a grant, which may include date of birth, biographical information, education and work experience, information about family members, employment information, citizenship and tax residency information, passport, dietary information, images of your signature, expenses, amount and intended purpose of grants you are involved in, and information about your participation in a specific program;
- * information you provide when you are considered for a governance role which may include education and work experience, information about family members, employment information, potential conflicts of interest, and expenses;
- * information you provide when you are considered as a consultant which may include education and work experience, employment information, images of your signature, and information about the services you may provide to WACC;
- * information about your use of our information and communications systems;
- * financial information including bank details, payment card details;
- * your communication preferences;
- * information about your professional status and role.

4. What information do we collect automatically online?

We will also collect certain information automatically every time you interact with our website. We may do this through server log files, cookies, and pixel tags. While the information obtained may not be personal information under the laws of the country you are based in, we recognize that there are certain laws (e.g. EU law) where this information is likely to be personal information.

For instance, we identify and log the Internet Protocol (IP) address of the device you use to access our website automatically in our server log files whenever you visit our website, along with the time of your visit and pages you visit. While the intention of such a practice is to calculate website usage levels and to help us diagnose problems with the website's servers, we recognize that an IP address is also an online identifier that can be used to create profiles of individuals behind devices. Thus, if we combine non-personal information with personal information, we will treat the combined information as personal information as long as it is combined.

5. What about personal information that is considered more sensitive?

Certain countries have laws that recognize particular types of personal information as more sensitive and therefore requiring greater protection. We will only collect and use this sensitive information if there is a valid reason for doing so and where the law allows us to. For instance, there are stricter rules about the collection and use of sensitive information where EU law applies.

6. How we use your personal information

WACC will use your personal information:

- to fulfil your requests to become a member or to submit an application or register on the website;

- to inform our regional associations of your interest in the WACC network and its activities;
- to allow us to review, evaluate and administer grants, scholarships, and other WACC programs;
- to enable us to monitor progress and completion of those programs;
- to enable us to monitor and manage conflicts of interest;
- to enable us to manage governance transactions;
- to contact you if you are involved in a project we are administering;
- to contact you to make recommendations, proposals, or notices to you about opportunities you may potentially be interested in;
- to make administrative and marketing communications;
- to enable you to use our online services (e.g. our forums, message boards, blogs);
- to administer any financial transaction between us;
- to register you for an event and any administration associated with the event;
- to contact you for our advocacy purposes and to inform you of events or publications we think you may potentially be interested in;
- for research purposes so that we can identify key trends of findings in connection with our programs and projects;
- to satisfy legal obligations which are binding on us;
- for the prevention of fraud or misuse of service; and
- for the establishment of, defence against, or enforcement of legal claims.

7. Lawful grounds

Under certain laws, we are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

- Consent.** We may obtain your consent to use your personal information in certain circumstances (e.g. to send you email marketing). We will ensure that when we obtain your consent, you are free both to give it and to decline to give it. Additionally, you may always withdraw your consent at any time without any detriment to you.
- Contractual relationship.** Where it is necessary for us to use your personal information in order to perform a contract to which you are a party (or to take steps at your request prior to entering a contract).
- Legitimate interests.** We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced, and does not unduly impact your

rights. For instance, it is in our legitimate interest to use personal information in the planning, delivery, and monitoring of our programmatic work and grant making.

- d) **Legal obligation.** Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject (e.g. because we have to provide information to tax authorities).

8. Use of our online services (e.g. forums, blogs)

We may make available certain interactive services through our social media accounts and our website such as message boards, blogs, forums, and other resource points.

Any information (including personal information) that you might post becomes public information and may be available to other visitors to our website and to the general public. In addition, your name may be available in association with any posting you make. Additionally, information regarding your forum activities is also available for other users to view, including information on directors' and members' web pages.

Please exercise caution and discretion when posting information (including personal information) on online platforms. In particular, please do not post personal information about other individuals unless you are confident that they would not object to their personal information being used in this way. If you post any personal information relating to other people, you represent that you have the authority to do so and to permit us to use the information in accordance with this privacy policy. **WACC is not responsible for the use by others of the personal information that you disclose on our forums.**

9. Do we share your personal information?

Apart from the conditions set out in this privacy policy, WACC will not sell, rent, or lease your personal information to third parties. However, we may ask third-party processors to assist us or we may disclose your personal information to selected third-party processors (such as agents or sub-contractors) for the purposes outlined at section 6. The third party in question will be obligated to use any personal information they receive in accordance with our instructions.

For instance, if we were to use a third-party marketing automation platform to assist with managing email addresses and sending emails to our subscribers: when you sign up to receive email updates from us and provide us with your email address, you will receive an automated email originating from this third party confirming your subscription and providing you with a link to unsubscribe from the list.

We may also engage third parties to assist us with website hosting, data analysis, transaction processing, grant making, and other administrative services.

We reserve the right to disclose your personal information to third parties:

- * for auditing purposes;
- * to enforce relevant Terms & Conditions;
- * to protect any WACC operations including the rights, safety, and property of WACC and our staff;
- * if we are under any legal or regulatory obligation to do so (e.g. to comply with legal process or requests from government authorities);

- * to permit us to pursue available remedies or limit the damages that we may sustain; and
- * in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise, or defend our legal rights.

10. International data transfers

Certain countries have rules around the transfer of personal information and require us to ensure that personal information remains protected according to appropriate standards. If you are located in the United Kingdom or the EU or your personal data is collected and used by an organization in the United Kingdom or the EU, please note that certain countries outside of the United Kingdom or the EU have a different standard of protection for personal information. In such cases, where your personal information is transferred, stored, and/or otherwise processed outside the United Kingdom or EU on a regular basis, we will implement appropriate safeguards designed to protect your personal information.

If you have any questions about the transfer of your personal information, please contact us using the details at section 17.

11. Securing your personal information

We have appropriate security measures to prevent Personal Data from being accidentally lost, or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected Data Security Breach.

12. How long do we keep your personal information?

WACC reviews the personal data it holds annually and removes data which does not conform to the purposes stated above. We keep personal information for as long as necessary:

- * to comply with any statutory or regulatory requirements we are subject to under applicable law;
- * to fulfil the purposes for which the personal information was collected; or
- * to defend our or a third party's legal rights.

13. Children

Our online platforms and services are not intended to be used by individuals under the age of sixteen (16) and we do not knowingly collect the personal information of individuals under the age of sixteen (16). If we are made aware of such information in our data processing systems, we will make every effort to remove it.

14. Your rights and preferences

Please note that we will honour your requests to exercise your rights to the extent possible and required under applicable law.

You have the right to:

- * ask us for **confirmation** of what personal information we hold about you, and to request a copy of that information; if we are satisfied that you have a legal

entitlement to see this personal information, and we are able to confirm your identity, we will provide you with this personal information;

- * **withdraw your consent** at any time if we have relied on consent as the lawful ground to use your personal information;
- * request that we **delete** the personal information we hold about you, as far as we are legally required to do so;
- * ask that we **correct** any personal information that we hold about you which you believe to be inaccurate;
- * **object** to the processing of your personal information where we (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes;
- * ask for the **provision** of your personal information to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means; and
- * ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate use.

Please note that you also have the right to lodge a complaint with your local data protection authority about how we use your personal information if you are located in the United Kingdom or the EU or your personal data is collected and used by an organization in the United Kingdom or the EU. Please always consider raising your concern with us first by contacting us using the contact details in section 17 below.

Your choices regarding our use and disclosure of your personal information

We give you choices regarding our use and disclosure of your personal information for marketing purposes. You may opt-out from:

- * **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails or text messages from us on a going-forward basis, you may opt-out by sending an email to outreach@waccglobal.org or by regular mail using the address provided at Section 17. You may also opt out of our email updates by using the unsubscribe link at the bottom of these emails.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails, text messages, or paper communications from us, we may still send you important administrative messages, from which you cannot opt-out.

15. Other websites

WACC's website may contain links to third-party websites. These linked websites are not under WACC's control and we are not responsible for the privacy practices or the contents of any such linked website, or any link contained in any linked website. We provide such links only as a convenience, and the inclusion of a link on the website does not imply endorsement of the linked website by WACC. If you provide any personal information through any such third-party website, your interaction will occur on such third-party's website (not on our website) and the personal information you provide will be collected by, and controlled by, the privacy policy of that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

16. Updating this privacy policy

WACC may update this privacy policy by posting a new version on our website. If we update this privacy policy in a way that significantly changes how we use your personal information, we will bring these changes to your attention. Otherwise, we would recommend that you periodically review this privacy policy to be aware of any other revisions.

17. How to contact us

Email: outreach@waccglobal.org

Post: WACC (Data Privacy), 308 Main Street, Toronto ON M4X4X7, Canada.