

# Privacy Notice

## **Keeping the faith**

The Florida-Georgia District of the Lutheran Church Missouri Synod ("the FLGA District," "we," "us," etc.) is a nonprofit Christian organization that provides services and resources to The Lutheran Church Missouri Synod ("the Church," "LCMS," or "synod") congregations, LCMS schools, LCMS ministries, LCMS Recognized Service Organizations and constituents located in Florida, Georgia and the Bahamas, so that they may live as fully committed followers of Jesus. This Website (<http://flgadistrict.org/>) is intended for only people residing within these jurisdictions. To find LCMS resources outside of these jurisdictions, please see the LCMS website (which we do not control) at <https://www.lcms.org/> and note that your use of that website will be subject to that site's terms and conditions.

Through our Website, we offer information and opportunities to gather, in person and online, to celebrate our beliefs and faith. We also help maintain, in support of LCMS, a nationwide placement database for LCMS Rostered workers, looking for guidance with their careers within the Church, along with continuing education resources for those leaders. The Florida-Georgia District also supports workers who are on the Minister of Religion – Ordained and Minister of Religion – Commissioned rosters of the LCMS.

These efforts, to connect constituents with one another – or to jobs and education – require us to collect personal information about (for example) conference registrants, teachers, pastors, and church leaders who use our tools and services. Furthermore, our support of LCMS and workers requires that we share certain information – including, where relevant, your personal information – with LCMS and other LCMS districts. When it comes to handling your personal information, we want to reassure you that it's being handled in a responsible way. This Privacy Notice is part of our effort to achieve that.

When you visit our Website to search for congregations, events, resources, or guidance; attend an event we sponsor or host; share your faith-based experiences so we may use them on the Website; or sign up to receive our monthly newsletters, sign up for other email distribution lists, you will share your

personal information in various ways. Sometimes we collect it directly from you. Other times, we use technology to automatically collect personal information. We may also receive your personal information directly from LCMS. In all cases, you can be confident that we will handle your personal information lawfully and faithfully, with an eye toward protecting your rights. We also want to give you the necessary tools and options to manage your personal information as you see fit.

This Notice applies to our Website and any sites or services that display these terms. It does not apply to any website, mobile app, or service that does not display or link to this Privacy Notice or that contains its own privacy notice. Please note that, because of the way our Website automatically collects some categories of personal information (explained in detail below), providing those categories is not optional if you wish to access our Website. Accordingly, if you do not agree with our policies and practices, please do not use our Website or services. By accessing the Website or using our services, you agree to this Notice.

### **How we collect personal information**

We may collect personal information from you directly or indirectly. When you fill out a form on our Website (to sign up for our newsletter or in connection with pledges from your congregation, or to register for a conference, for example), you provide personal information directly to us. Other times, personal information is collected automatically as you use our Website. In addition, we also may receive personal information from third parties with whom we partner.

### **We collect personal information when you provide it**

When you subscribe to our newsletter or fill out any other form on our Website, you will provide personal information that may include your name, email address, phone number, mailing address, and company.

Finally, you may provide personal information to us at events or by phone and even through old-fashioned mail when you correspond with us. Besides collecting your name, address, phone number, or email address, we may also take or receive photographs of you at conferences and other events we either sponsor or help moderate that we share on our Website or through social media posts.

### **We collect personal information from third-party sources**

We may collect personal information about you from certain third-party vendors, such as (a) our event-registration vendor, and (c) our donation and registration payment processor Vanco who provides information about donations made to us and event registration. We also use Constant Contact, an email marketing firm, to manage our database of constituents and disseminate our newsletters and targeted electronic communications; we share your personal information with Constant Contact so they may provide the services we request. Note that when we share your personal information with a third party, we require that third party to protect the information consistent with this Notice and limit use of the information to performing the services they provide to us.

As noted above, we work with LCMS and other LCMS districts across the United States to help maintain a national database of openings for internships, paid positions, and educational opportunities within the LCMS. Constituents who are seeking those kinds of opportunities will voluntarily share personal information that may include their names, contact information (mailing addresses, email addresses, phone numbers), gender, and education level. That information is maintained by the LCMS and is shared with LCMS seminaries, LCMS schools, LCMS congregations, LCMS districts, and LCMS Recognized Service Organizations ("RSO") in the United States.

We also may collect personal information from online social networks if you take part in a public conversation, for example, by posting on Facebook. We may collect personal information when you click "Share This" or "Like" buttons or otherwise use social media buttons or plug-ins. We sponsor social media pages and posts, and we moderate conversations and virtual meetings on those platforms. We also encourage sharing via social media of photos of constituents, as well as current/recent photos of celebrations, installations/commissioning, congregational recognitions and remembrances of faith. We recommend that you become familiar with the privacy policies of any social network you visit or use as their terms of use and privacy policy govern any information you post on those networks.

The payment processors we work with for conferences and other events we organize or support typically gather your personal information when you pay (or

otherwise sign up) to attend them. That information includes but is not limited to your name, address, email address, and credit card information. The information shared with us is limited to your name, email address, and a very limited amount of financial information (the last 4 digits of your card, the type of card used (Visa®, Mastercard®, etc.), and the name on the card) so that we may confirm your registration. It should be noted that the payment processor is not covered by this Notice, but by the payment processors' privacy policy and terms of use so please refer to those when using that service.

### **We collect personal information using automated technologies**

We use cookies and similar technologies, such as web beacons (sometimes called "tracking pixels" or "clear gifs"), to collect personal information, or that becomes personal information if we combine it with other information. This Notice uses "cookies" to collectively refer to these technologies.

Cookies are small data files that are placed on an individual's computer or mobile device when an individual visits a website. Cookies are widely used by website owners to make their websites work, or to work more efficiently, to enhance website security, and to provide reporting information. For example, cookies enable us to track website usage and determine the effectiveness of marketing and advertisements.

For detailed information regarding the cookies used in connection with our site, including the ability to turn certain cookies on or off, please review the information available in our cookie manager. Our cookie manager is accessible via a popup on our site. By default, only essential cookies (i.e., those required for core functionality and security of the site) are turned on; essential cookies are also the only category of cookies that you may not disable.

If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our Website may be restricted. You may also set or amend your web browser controls to accept or refuse cookies.

As the means by which you can refuse cookies through your web browser controls vary from browser to browser, you should visit your browser's help menu

for more information. In addition, most advertising networks offer you a way to opt out of targeted advertising.

Third parties may also deploy cookies on your computer or mobile device to serve advertising through our Website. These companies may use information about your visits to this and other websites to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. They can accomplish this by using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you.

Finally, as noted in our cookie manager, we use Google Analytics (via Google Tag Manager) on our Website. Google Analytics is a web analytics service offered by Google LLC that tracks and reports Website traffic to us. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You may be able to prohibit Google from collecting and analyzing the cookie-generated data about your use of the Website (including your IP address) by downloading and installing the browser plugin available here <http://tools.google.com/dlpage/gaoptout?hl=en>. As noted above, our use of Google Analytics means that we share information regarding your Website visit with Google – such as the URL of the page you are visiting and your IP address. This can result in Google sending you targeted advertisements. Google can also set additional cookies on your web browser or determine what cookies are already on that browser. More information regarding Google's privacy practices (and how they may impact you) can be found here: <https://policies.google.com/technologies/partner-sites>.

**We will not knowingly collect information from anyone younger than 16 years**

Our Website and services are not intended for use by anyone younger than 16 years old, and we will never knowingly collect personal information from anyone that young. If we become aware that personal information of anyone younger than 16 has been provided to us, for any purpose, we will delete the information from our files.

## **How we use personal information**

We know your personal information is important to you, so we want to be transparent about our use of it. As mentioned above, we use personal information primarily to send newsletters to Website visitors who have chosen to receive them, register Website visitors for conferences, and help other constituents find career and educational opportunities within the Church.

We also collect and use this information to provide easier, quicker access to our Website and secure the information you have provided. As constituents navigate through the Website, their movements will be tracked and analyzed. Using this information allows us to improve their experiences. We also use personal information:

- To send communications through email.
- To respond to support requests or respond to enquiries.
- To provide access to and maintain the security and integrity of the Website.
- To provide updates regarding the Website and its resources.
- To comply with legal and regulatory requirements applicable to the Church and internal policies for maintaining records.
- To protect all parties in the event of disputes.
- To comply with court orders and legal processes, and to enforce our Terms of Use and this Privacy Notice.
- For any other legal, business, or marketing purposes that comply with the practices described in this Notice.
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## **When we share personal information**

Once your personal information is collected, as detailed above, we may share it with third parties for various reasons. As mentioned above, we help connect constituents with career and educational opportunities that may be available within our District or other districts within the Church. Career and educational information about you may therefore be shared with LCMS and other districts. We also use Google Analytics to study how users interact with our Website and keep it up and running. This allows us to see what areas of our Website are most engaging and provide relevant and useful information to our constituents. Finally,

we use third parties – such as Constant Contact, event-registration vendors, and payment processors – who provide specialized services on our behalf.

**If you make a public post, other users may see it**

If you make a post on a third-party social media site, such as Facebook, or by identifying us in your social media feed by tagging us using a hashtag (#) or “at” (@), your personal information may be publicly available and is subject to the privacy policies of those third-party social media sites. As a reminder, this Notice describes how we will treat your personal information once it is in our possession – not how third-party sites will treat your information.

We therefore recommend you review the privacy policies of any third-party sites you visit to understand the data collection and practices of that third party.

**We may share feedback you provide to us**

We want to hear how we’re doing. If you have suggestions for improving our Website, resources and services, ideas for faith-based topics you’d be interested in learning about, or expanding the reach of our ministry, we want to hear from you. Please be aware that any feedback relating to our services on our Website or social media channels may be publicly shared.

**Eventual successors may access information**

In the event of a merger or reorganization of all or a portion of our assets, any user information owned or controlled by us may be among the assets transferred to third parties as successors in interest. As part of this type of transaction, we reserve the right to transfer or assign your personal information to third parties. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred user information will be subject to this Notice.

**We need to comply with legal requirements**

We may disclose your information to government authorities or other third parties if any lawful circumstances arise, including when:

- You have given us permission to share your information.
- We are required to do so by law, or in response to a subpoena or court order.
- We believe, in our sole discretion, that disclosure is reasonably necessary to protect against fraud, or to protect our property, constituents or other rights or those of other users of the Website, the Church, third parties, or the public at large.
- We believe that you have misused the Website by using it to attack or gain unauthorized access to a system or to engage in spamming or other conduct that violates applicable laws or our Terms of Use.

### **How we secure personal information**

We have implemented industry-accepted administrative, physical, and technology-based security measures to protect against loss, misuse, unauthorized access, and alteration of personal information in our systems.

While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet or form of electronic storage is 100 percent secure. We therefore cannot guarantee its absolute security.

### **Questions or concerns about security or privacy protocols.**

If you have received unwanted or unsolicited email from us or purporting to be sent by us, please forward a copy of that email with your comments to [communications@flgadistrict.org](mailto:communications@flgadistrict.org) for our review. If you feel that any of our privacy practices or security standards detailed in this Privacy Notice have been violated, you may contact us (see [Contact Us](#) at the end of this Notice for additional details).

### **Your Rights**

We understand that you want to protect and control your personal information. This section details how we will work with you to do so.

### **Opting out of promotional emails**

If you do not wish to receive promotional emails from us, you may follow the unsubscribe process at the bottom of the promotional email you received or by emailing us at [communications@flgadistrict.org](mailto:communications@flgadistrict.org). Please keep in mind that you still may receive transactional emails from us (such as emails related to the completion of event registration, password reset requests, reminder emails you have requested, and other similar communications) that may be necessary for us to make the Website available to you or respond to your enquiries and support requests.

### **Request for information and identity verification requirement**

You may request other information about our privacy practices – such as what personal information we have about you and with whom we have shared that information. To make a request, please contact [communications@flgadistrict.org](mailto:communications@flgadistrict.org) with “Personal Information Request” in the subject line and provide full details about your request, including your contact information and anything you believe is relevant.

Under certain circumstances, we may not fulfill your request, such as when doing so would interfere with our regulatory or legal obligations, when we cannot verify your identity, if your request involves disproportionate cost or effort, or when the law allows us to retain that information.

Applicable law may require us to verify that the request was made by someone with the legal right to access the information. Therefore, before accessing or divulging any information pursuant to a data access request, we may request that you provide us with additional information so we can verify your identity and legal authority, particularly when the information provided with the request is insufficient to confirm legal authority and/or identity.

### **European Economic Area, Switzerland, United Kingdom, or Canada resident rights**

We currently do not target our Website, resources, or services to individuals outside of Florida, Georgia and the Bahamas – such as to (without limitation) the European Economic Area, Switzerland, the United Kingdom, or Canada. We do not

intend for our Website to be accessed by anyone outside of the United States jurisdictions listed above. If we begin to tailor our Website resources and services to other jurisdictions, we will update these terms to ensure we reflect any additional rights reserved under applicable laws. Those updates will be made available within this Privacy Notice, in accordance with applicable law.

### **Comprehensive state-level privacy laws**

Various states around the United States (e.g., California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia) have passed comprehensive privacy laws that provide (or will soon provide) specific rights to those who live in those states. But those laws apply only to a subset of entities. The Florida-Georgia District is not currently subject to any of those laws. If, however, our business practices and future expansion changes, or if laws change, such that we are subject to them, we will update these terms to ensure we reflect any additional rights reserved under applicable laws. Those updates will be made available within this Privacy Notice, in accordance with applicable law.

### **Updates**

This Privacy Notice will be updated to reflect our personal information handling practices. We reserve the right to amend this Notice at any time, for any reason, without additional notice to you, other than through posting the updated Privacy Notice on our Website. We invite you to return to this page to ensure you are informed of any updates we make about how we collect, use, and protect personal information. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the beginning of this Notice.

**Contact Us:** If you have questions about the way we handle personal information, please contact us:

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877-457-5556**