# **Privacy Statement**

### Introduction

Thank you for visiting *emmanuelchurch.ch* (the site), presented to you by Emmanuel Episcopal Church in Geneva, Switzerland (the organization) as part of the Convocation of Episcopal Churches in Europe, The Episcopal Church of the United States, and a member of the Anglican Communion.

Your privacy is important to us. As such, we provide this Privacy Statement explaining our online information practices and the choices you can make about the way your information is collected and used at this general audience site. The term "the services" refers to all operational activities conducted by Emmanuel Church. Please note that non-profit and religious institutions are subject to legally mandated record keeping and reporting in their cities and countries of operation, and are permitted to retain necessary data for legitimate use purposes.

### The Information We Collect

Throughout the site, you may be able to subscribe to one of our services such as our online newsletters, to contact staff and volunteers, make a financial pledge, or participate in one of our communities. In the course of these various offerings, we often seek to collect from you various forms of personal information.

Examples of the types of personally identifiable information that may be collected include: name, address, e-mail address, telephone number, and information about your interests and participation in our programs and services. We also maintain a parish database inside our website, available to administrators only, that includes your contact information as stated above, as well as information such as volunteering groups, what year you joined, special needs, and other notes intended to facilitate our communication with, and ministry to you.

Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to publish our site and services to you. Your data may be stored through Wix.com's data storage, databases, and the general Wix.com applications. Wix stores your data on secure servers behind a firewall.

Our website tracks data on open rates, rejections, clicks, and views specifically for our newsletters in order to assess our publicity efficacy. If you have signed up to receive our e-mails, and prefer not to receive marketing information from this site, follow the "unsubscribe" instructions provided on any marketing e-mail you receive from us.

The organization does not at present, have an external analytic tracking system activated, such as Google Analytics to track your online movements within our website. Nor do we participate in ad tracking or paid advertising services to you. However, our website host, Wix has activated aggregate data tracking to include anonymous data on your movements on our website which includes: Time spent on our website, pages visited, the time of day of the site visit, the type of device used to access the site, and the country from which the website was accessed.

We do not collect or store specific bank account information on our site for payments made via bank transfer. If you choose to make a financial donation online via our website with your credit card, the donation is recorded in our website's online "store" to allow for the processing of your donation with your billing address, name, and transaction ID. Your credit card number is not visible or retained inside our website and may be processed through a third party payment processor which has it's own data processing and retention policy.

We, our website and email hosting service providers (Infomaniak and Wix), video service providers (YouTube and Vimeo), audio streaming service (Soundcloud), payment processor (Wix Payments), virtual meeting host (Zoom), and applications on our website (Epic Form Builder) may collect various types of information when you interact with these applications via our site. Please see the service providers' individual websites to view their privacy practices for more information.

#### **How We Collect Information**

When you conduct an interaction with us on our website, as part of the process, we may collect personal information you give us such as your name, address and email address, membership information, volunteer commitments, and financial pledges. Your personal information will be used for the specific reasons stated above only, and the information will be role-restricted and limited to those trusted by the organization to fulfill such legitimate organizational purposes. (See Appendix A).

### Why We Collect Such Personal Information

We collect such Non-personal and Personal Information for the following purposes:

- 1. To provide and operate the Services;
- 2. To provide our Users with ongoing user assistance and technical support;
- 3. To be able to contact our Subscribers and Users with general or personalized church related notices and messages;
- 4. To process online donations;
- 5. To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we or our affiliated partners may use to provide and improve our respective services;
- 6. To comply with any applicable laws and regulations.

# **Information Sharing and Disclosure**

We may disclose personally identifiable information in response to legal process, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, to verify or enforce compliance with the policies governing our sites and applicable laws or as otherwise required or permitted by law or consistent with legal requirements. Please see our <u>Safeguarding Policy</u> for further information on protective actions for minors, legal obligations, and commitments, as well as our electronic use of images and video content.

We may transfer information about you to the Convocation of Episcopal Churches in Europe if requested. The Convocation is required to protect this information in a manner that is consistent with this Privacy Statement and <u>Safeguarding Policy</u>, and is not authorized to use the information for any purpose other than to carry out the services they are performing for us.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed in a manner that is inconsistent with this privacy statement.

### **Contact Methods**

We may contact you via newsletter or email in addition to parish outreach visits, phone calls, text messages, and mailings to notify you regarding parish operations, your membership, to troubleshoot problems, to resolve an inquiry, to facilitate volunteer efforts, or to collect fees or monies pledged. In addition, you may be polled on your opinions through surveys or questionnaires. We may also send you updates about our organization, or may contact you to enforce our applicable laws, and any agreement we may have with you.

# **Cookies and Other Tracking Tools**

Our website and partners have the capability to track personal information through the use of cookies. Cookies are small pieces of data stored on a site visitor's browser, usually used for security purposes or to keep track of their movements and actions on a site.

Emmanuel Church's website does not utilize an external data tracking service for general analytics (such as Google Analytics), nor do we track your activity beyond our website for data mining or advertising purposes. Our site does track anonymous data on site visits and on open rates, rejections, clicks, and views specifically for our newsletters in order to assess our publicity efficacy. The organization has chosen

Wix as our website host, which uses some cookies for website functionality. You may participate in opting out of some cookies by selecting restricted options on our cookie opt out preference form.

There are two types of cookies:

**Session (Transient) cookies:** These cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

**Persistent (Permanent or Stored) cookies:** These cookies are stored on your hard drive until they expire (i.e. the are based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behavior or user preferences for a specific site.

Take a look at the following table to view which general cookies Wix places on Wix websites:

Cookie name	Life span	Purpose
svSession	Persistent	Identifies unique visitors and tracks a visitor's sessions on a site
hs	Session	Security
XSRF-TOKEN	Session	Security
smSession	Persistent (Two weeks)	Identifies logged in site members (Not currently in use on our site)
TSxxxxxxxx (where x is replaced with a random series of numbers and letters)	Session	Security
TSxxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Session	Security
RequestID	Session	Track visitor behavior and measure site performance

Third-party apps may use cookies that aren't listed in the table above. You can check which cookies are used on these platforms using your browser's built-in cookie view. You can change your privacy preferences regarding the use of cookies and similar technologies through your browser. You may set your browser to accept all cookies, block certain cookies, require your consent before a cookie is placed in your

browser, or block all cookies. Blocking all cookies will affect your online experience and may prevent you from enjoying the full features offered of a site. Please consult the "Help" section of your browser for more information.

Tips: Google how to view your specific browser's cookies for instructions on how to view which are in use on a given website, and for further information on how to adjust your cookie settings. Additionally, though Emmanuel Church does not participate in paid advertising, you can opt out of seeing online interest-based ads from Facebook and other participating companies through the <a href="Digital Advertising Alliance">Digital Advertising Alliance</a> in the US, the <a href="Digital Advertising Alliance">Digital Advertising Alliance</a> in Europe, or through your device settings.

## **Third-Party Social Networking Sites**

You may choose to engage with our content, such as video, and other offerings, on or through third-party social networking sites, such as Facebook or YouTube. When you engage with our content on or through third party social networking sites, you may allow us to view certain public information from your social media profile (e.g., name, e-mail address, photo, gender, birthday, location, connections, comments, posts or the 'likes' you make) to deliver the content or as part of the operation of the application. We may also obtain non-personally identifiable information (e.g., content viewed), from your interaction with our content.

Data furnished to us from your social media account, can help enable us to do things like (1) give you exclusive content, (2) personalize your online experience with us within and outside our applications or websites, and (3) contact you through the social networking sites or directly by sending you the latest news. By connecting with us on social media, you consent to the use of this information in accordance with our Privacy and <u>Safeguarding Policy</u>. When you provide personal information to us on social networking sites, it may be publicly viewed by other members of these sites and we cannot prevent further use of the information by third parties.

Through some social networking sites' privacy settings, you can control some of what data you share. For more information about how social networking sites handle your personal information, please refer to their privacy policies and terms of use. For a request for removal of postings on our Facebook page, please contact <a href="mailto:office@emmanuelchurch.ch">office@emmanuelchurch.ch</a> with Attn: to the Facebook Administrator.

### **International Transfer**

The Organization operates globally so it is necessary to transfer your information internationally. In particular, your information will likely be originated in Europe, and then transferred to and processed in the United States where many of our central databases operate. The data protection and other laws of other countries, such as the United States, may not be as comprehensive as those in your country.

Please be assured that we take reasonable steps to ensure that your privacy is protected. By using this site you consent to your information being collected, used and transferred as set forth in this privacy statement.

# **Our Commitment to Security**

We have put in place appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, to maintain data security, and to use correctly the information we collect online.

# Withdrawal/Limitation of Consent

Participants and site visitors imply consent to these Privacy Practices when they choose to use our website or engage with our church. However, you can make requests to view, delete, limit, or change collected information. Attempts will be made to the greatest extent allowed under the law and site functionality, to view, delete, limit, or amend records as requested.

If you would like to make a request to: access, correct, amend or delete any personal information we have about you, you are invited to contact us at: <a href="mailto:office@emmanuelchurch.ch">office@emmanuelchurch.ch</a> Subject: Privacy Request or send us mail to: 3 Rue de Monthoux 1201 Geneva, Switzerland. If you have questions about our Privacy Practices you can contact us via mail, the email address above, or via telephone at +41 (0) 22 732 80 78.

# **Privacy Policy Updates**

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.