

Privacy Policy

Effective Date: June ___, 2023

The Evangelical Covenant Church and its affiliated programs and entities (“The Church”) organizes and operates various activities and opportunities for members of The Church and the community (“Activities”). In order to effectively organize and operate the Activities, The Church may collect, use and maintain certain personal information from you which is and/or may be governed by various laws in the United States and the General Data Protection Regulation which applies across the European Union (including in the United Kingdom). Through this Privacy Policy, The Church intends to provide you information about how it collects and uses your personal information.

If you are a resident of California, please see the section of this Privacy Policy called “Your California privacy rights.”

If you are a resident of Illinois, please see the section of this Privacy Policy titled “Your Illinois privacy rights.”

If you are a resident of the European Union (including the United Kingdom), please see the section of this Privacy Policy called “Your Rights under the GDPR.”

If you have any questions or concerns about this Privacy Policy, how The Church collects and uses your personal information, or questions about which policy applies to information you provided, please contact The Church at 773-784-3000.

The Church may change this Privacy Policy. The “Effective Date” at the top of this page shows when it was last revised. Any changes take effect when The Church posts its revised Privacy Policy.

I. Personal Information Collected About You

The Church may collect the following personal information about you:

- Contact information including your name, mailing address, email address, and telephone number;
- Demographic information such as your age and date of birth, marital status, sex and/or gender;
- Citizenship information such as your citizenship status, passport number, and passport issuance/expiration date;
- Professional or Employment information such as your occupation and/or employer;
- Education information such as your school;
- Religious affiliation and/or information such as your church’s name, address, and pastor’s name, email address and phone number;
- Familial and/or relationship information such as your personal reference’s and/or emergency contact person’s name, phone number and/or email address;

- Personal Health information such as any existing physical or mental health conditions, serious illnesses, medications, and/or allergies;
- Medical Insurance information such as your insurance company's name, address, phone number, and policy number;
- Language preferences;
- Information regarding your enrollment or potential enrollment in certain Activities;
- Payment card information;
- Biometric information, including in images you provide such as passport photos;
- Other information that you provide to The Church.

This personal information is required for The Church to consider your application to participate in certain Activities and to allow you to participate in the Activities. If you do not provide your personal information to The Church upon request, The Church may not permit you to participate in certain Activities.

II. How Your Personal Information is Collected.

The Church collects most of this personal information directly from you – in person, by telephone, text or email and/or through participation and/or applications forms for Activities submitted through The Church's website. However, The Church may also collect information from:

- Other applicants, participants, leaders and/or volunteers with whom you are affiliated and/or with whom you apply to participate in Activities;
- Consumer reports, investigative consumer reports, and/or criminal background checks, as authorized by you;
- Or from any other sources, as authorized by you.

III. How and Why Your Personal Information is Used

Under data protection laws, The Church can only use your personal information when it has a proper reason for doing so. This may include:

- Communication with you and persons close to you;
- Determining whether you are eligible and able to participate in Activities;
- Your health and safety prior to, during and after participation in Activities;
- Protecting your vital interests or those of another natural person;
- Organizational, operational and planning purposes relating to the Activities;
- Compliance with legal and regulatory obligations;
- For The Church's legitimate interests or those of a third party, which are not overridden by your own rights and interests;
- Where you have given consent; or
- Other permissible uses for which you have been provided notice at the time of collection.

IV. With Whom Your Personal Information is Shared

The Church may share your personal information with:

- The Church's programs and affiliates who have a role or interest in the Activities;
- The Church's attorneys, auditors, accountants and other external professional service providers;
- Service providers, independent contractors, vendors and other third parties that help organize, operate, plan and/or execute the Activities;
- Qualified medical personnel for your health or safety;
- Governmental or public authorities or pursuant to legal request as reasonably necessary: (1) to comply with any applicable law, regulation, legal process, subpoena, warrant, or governmental request; (2) to ensure your health, safety, well-being and/or eligibility and ability to participate in the Activities, including through cross-border travel; and (3) to investigate and defend The Church against any third-party claims or allegations.

Your personal information will not be sold, leased, traded or otherwise disclosed for a business or commercial purpose.

V. Where Your Personal Information is Held

Your personal information may be held at The Church's offices and within The Church's electronic storage depositories, along with those of the entities identified in Section IV - "With Whom Your Personal Information is Shared."

The Church and some of these third-parties may be based outside the European Economic Area. If you reside in, and have provided your personal from within, the European Economic Area, your personal information will be transferred outside of the European Economic Area, including to The Church which is headquartered in Chicago, Illinois, United States of America. At this time, no data transfer pact exists between the EU and U.S. For further information, see Section IX regarding Your Rights Under the GDPR.

The Church will use reasonable, technical and administrative safeguards to store and protect your personal information. The Church limits access to your personal information to those who have a genuine need to access it.

VI. How Long Your Personal Information Will Be Kept

The Church will keep your personal information during your application for and participation in the Activities. Thereafter, The Church will keep your personal information for as long as necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that you were treated fairly; or
- To keep records required by law.

The Church will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, The Church will delete and

destroy it, except that which is necessary to maintain records of participants in said Activities, releases, consents and/or waivers relating to said Activities, and as otherwise required by law.

VII. Your California Privacy Rights

Effective: June ____, 2023

This section supplements The Church's Privacy Policy and applies solely to California residents about whom The Church has collected personal information from any source, including in person, by telephone, text or email and/or through participation and/or application forms for Activities submitted through the Church's website. Under the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the "CCPA"), California residents have the right to receive certain disclosures regarding The Church's information practices related to "personal information," as defined under the CCPA.

This section does not apply to The Church's personnel or job applicants. The terms used in this section have the same meaning given to them in the CCPA.

A. Personal Information Collected About You

The Church may collect (and may have collected during the 12-month period prior to the effective date of this section) the following categories of personal information (as enumerated in the CCPA) about you. For more information about the personal information collected by The Church, see Section I above.

- Identifiers, which may include your name, mailing address, email address, telephone number, and government-issued ID numbers;
- Biometric information, which may include passport photos, facial geometry scans, and/or other similar biometric identifiers;
- Audio, electronic or visual information, which may include images you provide to The Church;
- Professional or employment-related information such as your occupation and/or employer;
- Education information such as your school;
- Information not limited above and related to characteristics protected under California or federal law, which may include demographic information, information such as your age, date of birth, marital status, gender and/or sex, and language preferences;
- Other personal information not listed above and described in California Civil Code § 1798.80(e), which may include payment card information and other financial or health information and other information you provide to The Church.

The Church may also collect (and may have collected during the 12-month period prior to the effective date of this section) the following categories of sensitive personal information:

- Government identification, such as government issued identification, passport numbers, photo and expiration dates;

- Information concerning your health, such as medical and mental health conditions, serious illnesses, medications, and/or allergies.

B. How Long Will Your Personal Information Be Retained

The Church will retain personal information only as long as necessary and in alignment with its data retention schedules. Information may be retained to comply with applicable law, adhere to contractual requirements, in anticipation of litigation or a legal matter, or as otherwise necessary and proportionate to provide you with the ability to participate in Activities.

C. What Does the Church Do With Your Personal Information

The Church may use (and may have used during the 12-month period prior to the effective date of this section) your personal information for the purposes described in Section III of the Privacy Policy and for the following business and commercial purposes specified in the CCPA:

- Performing services, including considering your application for the Activities and assisting with the execution of those Activities;
- Undertaking activities to verify or maintain the quality or safety of the Activities and to improve, upgrade and enhance the service of the Activities.

D. Source of Collected Information

The Church may collect (and may have collected during the 12-month period prior to the effective date of this section) your personal information from these sources:

- you – in person, by telephone, text or email and/or through participation and/or application forms for Activities submitted through The Church’s website. However, The Church may also collect information from:
 - Other applicants, participants, leaders and/or volunteers with whom you are affiliated and/or with whom you apply to participate in Activities;
 - Consumer reports, investigative consumer reports, and/or criminal background checks, as authorized by you;
 - Or from any other sources, as authorized by you.

E. What Personal Information is Shared and With Whom

| Category of Personal Information | Category of Third Parties to Whom We Disclosed Personal Information | Category of Third Parties to Whom we “Sold” or “Shared” personal information |
|---|--|---|
| Identifiers | Subsidiaries and affiliates; service providers; Government entities, regulators and law enforcement; medical professionals | N/A |

| | | |
|---|--|-----|
| Biometric information | Government entities, regulators and law enforcement | N/A |
| Audio, electronic or visual information | Government entities, regulators and law enforcement | N/A |
| Professional or employment-related information | Government entities, regulators and law enforcement | N/A |
| Education information | Government entities, regulators and law enforcement | |
| Other personal information not listed above and described in California Civil Code 1798.80(e) | Government entities, regulators and law enforcement; medical professionals | N/A |
| Sensitive personal information | Government entities, regulators and law enforcement | N/A |
| Information not listed above and related to characteristics protected under California or federal law | Government entities, regulators and law enforcement; medical professionals | N/A |

The Church does not sell your personal information to third parties in exchange for monetary consideration or otherwise. The Church does not knowingly sell the personal information of minors under 16 years of age.

F. Your Privacy Rights

If you are a California resident and The Church collects, uses, or discloses personal information subject to CCPA, you may have the following rights under the CCPA with respect to your personal information:

- **Right to know/access:** You have the right to request from The Church (up to twice per year and subject to certain exceptions): (i) categories of personal information about you that The Church has collected; (ii) the sources from which The Church has collected that information; (iii) The Church's business or commercial purposes for collecting, selling, or disclosing that personal information; (iv) the categories of third parties to whom The Church has disclosed that personal information; and (v) a copy of the specific pieces of your personal information that The Church has collected.
- **Right to delete:** Subject to certain conditions and exceptions, you may have the right to ask The Church to delete certain personal information The Church collected from you.

- **Right to correction.** You may have the right to ask The Church to correct inaccuracies in the personal information The Church has collected.
- **Right to opt out of sale/sharing.** You have the right to opt out of the sale of your personal information by The Church. You will find our Notice information below.
- **Right to non-discrimination.** The Church will not discriminate against you if you exercise any of these privacy rights.

G. How to Submit a Request:

If you are a California consumer and wish to exercise these rights, you can reach The Church in one of the ways shown below:

- Call 773-784-3000
- Write us: The Evangelical Covenant Church, 8303 W. Higgins Road, Chicago, IL 60631

VIII. Illinois Biometric Information Security Policy

If you are an Illinois resident and The Church collects, uses, or discloses biometric data, this policy may apply to you.

A. Purpose

This Biometric Information Security Policy (the “BIS Policy”) defines The Church’s policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by The Church.

The Church collects passport photographs via applications for Activities on its website to ensure that you are eligible to travel internationally for Activities and to have a picture of you in the event it is necessary for identification or other purposes. Collection of passport photographs may allow geometric or other scanning of your face in the photograph.

B. Definition of Biometric Data

The terms “biometric data” and “biometric information” as used in this BIS Policy and Release, Consent and Indemnity Agreement, are intended to have the same definition provided in the Illinois Biometric Information Privacy Act, 740 ILCS §14/1, *et seq.*

C. BIS Policy

The Church’s policy is to protect and store biometric data in accordance with the applicable standards and laws, including the Illinois Biometric Information Privacy Act. An individual’s biometric data will not be collected or otherwise obtained by The Church without prior written consent of the individual. The Church will inform the individual of the reason his or her biometric information is being collected and the length of time the data will be stored.

The Church will not sell, lease, trade, or otherwise profit from an individual’s biometric data. Biometric data will not be disclosed by The Church unless (i) consent is obtained, (ii) required by law; or (iii) required by valid subpoena or warrant.

Biometric data will be stored during the term of your application for, and participation in, Activities. The biometric data will be stored using a reasonable standard of care and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information held by The Church. For example, these safeguards include physical and digital security measures, encryption, access restrictions, password authorization, system logging, and file backup.

The Church will permanently destroy your biometric data when the first of the following occurs:

- a. The initial purpose for collecting or obtaining such biometric data has been satisfied, such as your return home from all Activities and statement that you do not plan to participate in any additional Activities; or
- b. Within two (2) years of the last Activities in which you participated.

IX. Your Rights Under the GDPR.

If you work, normally live, or otherwise provide personal information in the European Union or European Economic Area, and The Church collects, uses, or discloses personal information subject to GDPR, you may have the following rights under the GDPR with respect to your personal information:

- **Right to Access:** The right to be provided with a copy of your personal information (the right of access);
- **Right to Rectification:** The right to require us to correct any mistakes in your personal information;
- **Right to be Forgotten:** The right to require us to delete your personal information—in certain situations;
- **Right to Restriction of Processing:** The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data;
- **Right to Data Portability:** The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations;
- **Right to Object:** The right to object at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests;
- **Right Not to be Subject to Automated Individual Decision-Making:** The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you;
- **Right to Lodge a Complaint:** The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred;

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the General Data Protection Regulation.

X. How To Contact The Church

If you want to contact The Church regarding any part of this Policy or your rights, please contact The Church as follows:

- Call 773-784-3000
- Write us: The Evangelical Covenant Church, 8303 W. Higgins Road, Chicago, IL 60631