



# PRIVACY AND DATA PROTECTION POLICY

**EFFECTIVE DATE: MAY 13, 2019**

## YOUR PRIVACY

St. Luke's Episcopal Church of Durham, NC is committed to respecting your personal privacy and the protection of your sensitive information. We developed this policy to inform you of the way your information is collected and used. We also provide you with the opportunity to remove your personal identifiable information from our system(s), if you desire to do so.

## COLLECTION OF INFORMATION

Whether received from telephone calls, written visitor cards, email, letters, or our website, <http://stlukesdurham.org>, anyone can provide contact information for ministry-related purposes, register for events, request/update membership information, and/or make gifts, contributions, and financial pledges. Here is a sample of the types of personal identifiable information (PII) that we collect:

**PII:** Name, organization/church, date-of-birth, date and place of baptism/confirmation/wedding, spouse or partner/family member information, complete address, phone number, and/or email address.

**Payment Card Industry (PCI):** Payment/gifts/bequests information (credit/debit cards). Note: This information is redirected to a third-party payment processor over an encrypted channel. No PCI information is stored on the St. Luke's computer system(s) or hard-copy print. For more information on ACS, see <https://legal.acst.com/privacy-policy>.

All membership records, including relative PII, are stored on our third-party application service provider's system, ACS. Some PII (births, deaths, marriages, baptisms, confirmations) are permanently kept in hard-copy format in the church's archives.

Access to ACS is restricted on a need-to-know basis to keep this data secure, and access and role reviews to this system are conducted at least annually and approved by the Vestry.

## HOW INFORMATION IS USED

St. Luke's uses your information to understand your needs and provides you with better ministry, pastoral care, and for church communications. Specifically, we use it to help you complete a

transaction, communicate back to you, update you on ministry events/happenings, and personalize our website for you.

Credit/debit card numbers are used for gifts, contributions, donations, or payment processing for the purpose you designate and authorized by you via the ACS system. All monetary transactions on the ACS system use Internet encryption software and Secure Socket Layer (SSL) protocol when collecting or transferring sensitive data such as credit/debit card information. Once you enter your payment card information, it is accessible only by you and our PCI-compliant payment processor (ACS). Parishioners' credit/debit card information is not accessible to St. Luke's staff or members. Our website and Facebook also allows the use of PayPal for financial contributions, another PCI-compliant payment processor managed by the user and PayPal. See PayPal for details on their security/data privacy.

On occasion, St. Luke's uses The Square, a point-of-sale device to accept credit card payments on Apple, Android, or other mobile devices. Security is engineered into the Square hardware and software and the payments are encrypted from end-to-end transmission. For more details on the Square, see <https://squareup.com>.

## COOKIES

When you view our website, we may store some information on your computer in the form of a cookie. Cookies allow us to tailor our website to better match your interests and preferences. Usage of a cookie is in no way linked to any of your personally identifiable information while on our site. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience all features and content of our website.

## USE AND SHARING OF INFORMATION

When you provide St. Luke's with personal data, we may use that information in the following ways: Provide you with St. Luke's Episcopal Church news and events and receipt of our electronic newsletters and other church or diocesan communications.

If we use your personal data to contact you, we will provide you with a method allowing you to opt-out of future communication. You can also contact us by e-mail, writing or telephone, at the below contact information.

We will not sell, share, or otherwise distribute your personally identifiable information to third parties, except as required by law.

## YOUR CONSENT TO THIS PRIVACY POLICY

By using our website and payment processors, you signify that you agree with the terms of our current Privacy and Data Protection Policy as posted on our website. If you do not agree with any term in this Policy, please do not provide any Personal Identifiable Information on the site. If you do not provide Personal Identifiable Information on this site, you may not be able to do certain things,

like access particular areas of the site, request certain types of information, pledge online, or receive communications.

## ACCESS TO YOUR PERSONAL INFORMATION

Upon request you can review, update and correct the personal identifiable information you provided to us. To access this information, you can create and maintain an account in ACS at: <https://secure.accessacs.com/access/login.aspx>

## PRIVACY OF CHILDREN

St. Luke's requires that all pictures of children posted to our website or other publications have the permission of a parent or legal guardian. We also require that all users of our ACS payment processor be at least 13 years old or have the permission of a parent or legal guardian. We rely on the person(s), church, or organization using our website or ACS service to get permission from each child's parent or legal guardian when collecting personal information. We do not specifically market to children under the age of 13 years old.

## SECURITY

St. Luke's maintains physical, electronic, and procedural safeguards to protect against the loss, misuse or alteration of the information under our control. Safeguards include restricted access to computer systems and hard-copy files, encryption, and secure authentication methods.

For example, when our online giving form asks you to enter personally identifiable information for online transactions, your information is encrypted using secure socket layer technology (SSL) and stored with up to a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards and best practices.

All of your information is restricted in our church office. Only employees or designated church staff who need the information to perform a specific job function are granted access to personally identifiable information. If you are uncomfortable sharing your personal data with St. Luke's, please contact the church office.

St. Luke's uses third party partners to provide the necessary hardware, software, networking, storage, and related technology required to provide financial and PII protection services.

Payment processing services on our website and Facebook are provided by third party partners and are subject to the third parties' terms and privacy policies. As a condition of St. Luke's enabling payment processing services through third party partners, you agree to those third party terms and conditions. Credit card numbers are not stored by St. Luke's system(s), they are stored by trusted third parties in an encrypted fashion that is PCI (Payment Card Industry) compliant.

Be aware, you should not forward any communications or ACS information on to other people or share your ACS password(s). Any emails sent to you are meant for you alone and may contain links (which allow access to your account) or other PII which should not be given to other people.

## **REMOVAL OF PERSONAL INFORMATION – OPT OUT**

If you have any questions or concerns regarding the privacy of your Personal Identifiable Information, or wish to have this information removed, please contact us at (919) 286-2273 or send us a detailed message at [parish-admin@stlukesdurham.org](mailto:parish-admin@stlukesdurham.org). We will make every effort to resolve your concerns.

## **CHANGES TO THIS STATEMENT**

We may occasionally decide to change our Privacy and Data Protection Policy, especially as new features, emerging technologies, and compliance requirements change. If there are changes to this statement, we will post those changes on our website so you are always aware of what information we collect, and how we use it. If at any point we decide to use your Personal Identifiable Information in a manner different from that stated at the time it was collected, we will update this policy, notify the distribution base, and publish this document.