

PRIVACY POLICY

Introduction. Civitan International (“Civitan”, “us”, “our”, or “we”) has created this privacy policy in order to demonstrate our firm commitment to your privacy. This privacy policy will inform you of our information gathering and dissemination practices when you become a member of a Civitan affiliated organization, use services provided by Civitan, or visit our websites at www.civitan.org or <https://juniorcivitan.org/>. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it.

Changes to this Privacy Policy. The terms of this policy may change, so please check it from time to time. This version was last updated on June 20, 2021. We keep our privacy policy under regular review, and we will place any updates on this web page.

The privacy policy below is intended for our non-EU contacts. If you are an EU data subject, please refer to our [EU Privacy Policy](#).

WHO WE ARE

Civitan is a global organization dedicated to serving the local communities of its members, with a focus on serving people with intellectual and developmental disabilities. Using the structure of building local clubs, Civitan equips its members to address local needs with local solutions.

INFORMATION COLLECTION

We collect several types of information from and about you, including:

- **Information provided by you**, such as name, address, email address, telephone number, membership status, gift amounts, club affiliation and other personally identifying information. For example, we collect information from you when you fill out a form on our website or when you voluntarily register to become a member of a Civitan affiliated organization; and
- **Payment information for donations**, such as credit card number, credit card expiration date, cardholder name, card security code of credit card, bank name, routing number, account number, and account holder.

INFORMATION USE

We use information that we collect about you or that you provide to us:

- to provide you with information, goods or services that you request from us;
- to provide you with notices about your membership and to improve membership service (your information helps us to more effectively respond to your membership requests and support needs);
- to notify you about changes to our website or any products or services we offer or provide though it;

- to allow you to participate in interactive features on our website and to personalize your experience (your information helps us to better respond to your individual needs);
- to enable communications to you regarding our organization and services such as email, newsletters, and magazines;
- to fulfill any other purpose for which you provide it and in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

DISCLOSURE OF YOUR INFORMATION

We may disclose information that we collect about you or that you provide us directly as described in this privacy policy:

- to our affiliated organizations, including local Civitan clubs, Civitan districts and Civitan division offices;
- to contractors, service providers, and other third parties we use to support our business;
- to fulfill the purpose for which you provide it. For example, to process a donation made through our website;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government, regulatory, or law enforcement request; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers, or others.

We may disclose aggregated information about our users and deidentified data or information that does not identify an individual.

SECURITY

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

LINKS

Our websites may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they

leave our site and to read the privacy statements of any other site that collects personally identifiable information.

CHILDREN UNDER THE AGE OF 13

Our websites are not intended for children under 13 years of age. No one under age 13 may provide any information to or on the websites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information to or on this website or through any of its features. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us in one of the ways provided in the Contact Information section, below.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page.

CONTACTING US

If there are any questions regarding this privacy policy you may contact us via telephone at 205-591-8910 or via mail at dataprivacy@civitan.org.

EU Privacy Policy

Who We Are

Civitan is a global organization dedicated to serving the local communities of its members, with a focus on serving people with intellectual and developmental disabilities. Using the structure of building local clubs, Civitan equips its members to address local needs with local solutions.

The Data We Collect

Civitan may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name and last name.
- **Contact Data** includes address, email address, telephone numbers.
- **Financial Data** includes credit card number, credit card expiration date, card security code of credit card, cardholder name, bank name, routing number, account number and account holder.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Civitan does not collect **Special Categories of Personal Data** about you unless there is a clear reason for doing so. We will only collect and store special categories of personal data with your consent.

Children Under 16

Civitan does not collect personal data on individuals under 16 without parental consent. If we become aware that a child under 16 has provided us with Personal Information, we will take steps to require that consent is given or authorized by the holder of parental responsibility over the child. If you become aware that a child under the age of 16 has provided us with Personal Information without parental consent, please contact us in one of the ways provided in the Contact Details section, below.

How We Collect Your Personal Data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data, Financial Data, Transaction Data and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Become a member of a Civitan organization;
 - Request our products or services;
 - Sign up to receive our newsletter or other publications;
 - Purchase an item from the online store;
 - Apply for employment with us; or
 - Participate in a survey
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity Data and Contact Data from providers of services as set out in the “Service Providers” section below;
 - Identity Data and Contact Data from publicly available sources; and
 - Identity Data and Contact Data from third-party social networks such as Facebook and LinkedIn.

How We Use Your Personal Data

Civitan is the sole owner of the information collected on this site. We will not sell, share, swap or rent this information.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- where you have provided your consent to allow us to use your data in a certain way;
- where the processing is necessary to carry out for the performance of a contract with you;
- where the processing is necessary in order for us to comply with a legal obligation; or
- where it is in our legitimate interests to perform our functions, for example, sending you administrative communications where our legitimate interest is to provide services to you.

From time to time, we may request information from you via surveys. Participation in these surveys is completely voluntary, and you may choose whether or not to disclose your information. Information requested may include contact information and demographic information. The information that Civitan collects through surveys will be used for the purposes of monitoring or improving the use and satisfaction of the members of our organization.

When you make a purchase from our online store, we will collect certain information from you including your name, address, tax ID, phone number, email address, marketing preferences and payment details, so that we can process your product shipment or contact you if we have any queries regarding your transaction.

Marketing Communications

Where you give us your consent, we will also use your personal data in order to send you marketing and fundraising communications in connection with the following marketing and fundraising activities and services:

- Newsletters
- Electronic magazines
- Email announcements
- Mailouts
- Facebook groups sponsored by Civitan

You decide how you want us to contact you, whether by mail, email or by phone and you can update your communication preferences at any time by contacting us at the Contact Details below.

Data Profiling and Analysis

We may also carry out analysis of the personal information we collect about you and add publicly available information to create a profile of your interests, preferences and your ability to support us, including the amount or level of potential donation or legacy you may be able to give.

This is so we can contact you in the most appropriate way and with the most relevant information, which enables us to raise funds for outreach more cost-efficiently.

Publicly available information is compiled from sources such as public registers, newspaper articles, and social media posts.

Please let us know if you would prefer us not to process your data in this way by contacting us in one of the ways provided in the Contact Details section below.

Our donors and supporters

If you wish to support us by making a donation, we will collect your name and contact details as a minimum.

Where appropriate, we may also ask for your motivation or personal experience for supporting us. We will use the information you provide to give you the services, products or information you asked for, tailor communications to you, to administer your donation, to send you a thank you letter or thank you call, to support your fundraising or manage your marketing preferences.

We may also send you administrative communications, for example confirming a direct debit instruction when you have made a donation to us.

How We Share Your Personal Data

Service Providers

Civitan may share your information with certain outside vendors and service providers.

Outside vendors are used in processing payment information and shipping orders, as well as assisting analysis of membership data. We only use companies who agree not to retain, share, store, or use personally identifiable information for any secondary purposes. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We work with the following companies to facilitate provision of our services:

- Blackbaud;
- 3D Cart;
- Gravity Forms;
- Servis First Bank; and
- Survey and Ballot Systems.

Some of these companies have payment gateways operated on behalf of and under contract to us. Further information about the collection and use of your data will be provided on the relevant payment gateway for you.

We also partner with certain third parties to provide specific services. When you sign up for these services, which will be identified to you before or during the sign-up process, we will share names or other contact information necessary for the third-party to provide these services. These parties have agreed not to use personally identifiable information except for the purpose of providing these services.

Due to Civitan's global presence, the collection and processing of personal data may involve the transmission of data on an international basis. This means for instance that data you pass to us may be transferred and processed outside the European Economic Area (EEA). In such cases where such transfer occurs, we endeavor to maintain an adequate level of protection in accordance with GDPR, including, where appropriate requiring contractual commitments between companies transferring personal data, as these clauses bind the parties and require them to protect the privacy and security of the data and/or obtaining express consent to the transfer of your personal information.

User Disclosures

Members may have access to certain electronic forums, such as Facebook pages, chat rooms, bulletin boards, e-mail lists, or others, to which other members also have access. The information and materials on those platforms have not been verified or approved by us. The views expressed by other users on our site may not be representative of our views or values. Civitan does not routinely monitor these forums and is not responsible for protecting the privacy and confidentiality of any information that you disclose in such a forum.

Third-Party Links

This website may contain links to other sites, not owned, associated or managed by Civitan. Please be aware that while we try our best to only link to reputable websites, we are not responsible for the privacy practices of such other sites. Users are encouraged that when they leave our site they should read the privacy statements of each website that collects personally identifiable information.

Data Security and Access

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Different laws require us to keep different data for different periods of time, for example:

- Certain regulations we are subject to, including the United States Internal Revenue Code require that we keep records of financial transactions for seven years.
- Certain regulations we are subject to in the United States of America require that we retain information on former employees for up to three years after termination of employment.
- Data on former members and supporters is typically retained for up to three years after last contact. However, we will keep your data during your lifetime if you have included us in your will, estate planning, or trust.
- Information that does not need to be accessed regularly, but which still needs to be retained, is archived or placed offline.

Correction/Updating Personal Information

You can help us keep our records up to date by telling us when your contact details and other personal information change. You can also change your mind at any time about how we contact you or ask us to stop contacting you altogether.

Please contact our office and they'll make the changes for you:

- By telephone: 205-591-8910
- By email: scarlet@civitan.org
- write to: Civitan International, One Civitan Place, Birmingham, Alabama 35213-0744

If you tell us that you no longer want to receive further contact from us and you are in our donor or member database, it may take a short while before our communications stop altogether as selection of donor or member information for some of our communications is completed a few weeks in advance. If you request to receive no further contact from us, we will keep the information we hold on you and add you to our suppression lists to ensure that you do not receive unwanted materials in the future.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please email us at dataprivacy@civitan.org or contact us in one of the ways provided in the Contact Details section below. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [Contact Us](#).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Contact Details

If you have any questions, comments or suggestions, please let us know by contacting us:

- By telephone: 205-591-8910
- By email: scarlet@civitan.org or dataprivacy@civitan.org
- write to: Civitan International, One Civitan Place, Birmingham, Alabama 35213-0744