#### CHURCH BENEFITS ASSOCIATION PRIVACY POLICY

The following is the policy of the Church Benefits Association (**"CBA"**) for the use and sharing of personal and business information of our constituents.<sup>1</sup>

### **Basic Principles**

- The CBA is committed to respecting and safeguarding our constituents' rights to privacy and to protecting their personal and business information, by which we mean information that is unique to an individual such as name, address, telephone number or email address.
- The benefits, products and services provided by the CBA require that we use and share certain personal and business information in the ordinary course of conducting our businesses.
- The CBA seeks to provide the following:
  - Protection and security of our constituents' personal and business information by the CBA and our vendors;
  - Limitations on the use and sharing of personal and business information as described in this Privacy Policy;
  - Procedural safeguards designed to ensure appropriate access and use of personal and business information by the CBA and our vendors;
  - Complaint and remediation mechanisms; and
  - Enforcement of this Privacy Policy.
- Any sharing or use of a constituent's personal and business information, other than as expressly permitted by this Privacy Policy, will require the permission of that constituent.

#### Certain Uses and Sharing Always Permitted (No Opting Out Allowed by Constituents)

- The CBA may use and share our constituents' personal and business information with our vendors for the purpose of operating, administering, and delivering CBA benefits, products, and services to our constituents.
- The CBA may publish the names, addresses and phone numbers of our constituents who have registered to attend the CBA Annual Meeting in the CBA Annual Meeting materials and may disclose this information for any other purpose consistent with the charitable mission of the CBA.
- The CBA may use our constituents' email address to notify constituents of CBA events, including the CBA Annual Meeting, or external events or resources that the CBA Executive Committee determines would benefit constituents.
- Our constituents' personal and business information may be shared for any purpose relating to a CBA Topical Interest Committee, focus group or other CBA activity that is consistent with the mission of the CBA.

<sup>&</sup>lt;sup>1</sup> We use the term "constituents" to mean the CBA members and their employees, prospective CBA members, our employees, officers, directors and independent contractors and visitors to our website.

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### <u>Marketing by CBA Vendors Attending CBA Annual Meeting: Only Permitted If</u> <u>Constituents Opt-In</u>

- In addition to the uses described above, the CBA may share our constituent's personal and business information with third party vendors attending the CBA Annual Meeting and may charge a fee to the third party vendor for this information. This information will be shared with third party vendors in accordance with the following guidelines:
  - Constituents must opt-in during the CBA Annual Meeting registration process to such use of their personal and business information; and
  - Such personal and business information may be shared with the CBA vendors attending the CBA Annual Meeting, but such third parties will have no independent rights to use or disclose such personal and business information except for purposes that are consistent with our charitable mission and approved by the CBA.

# **Other Permitted Uses**

- The CBA may use or share our constituents' personal and business information to the extent required or permitted by applicable federal, state, or other laws and regulations, or as requested by courts, government authorities or agencies.
- The CBA may share personal and business information to prevent or lessen a serious and imminent threat to a person or the public, when such disclosure is made to someone we believe can prevent or lessen the threat (including the target of the threat).
- The CBA may track whether individuals who receive emails from the CBA have received and/or opened such emails.
- The CBA collects information from visitors to our website. Other permitted uses may be specified in the CBA's Website Privacy Statement, which can be found by going to <a href="https://www.memberclicks.com/privacy">https://www.memberclicks.com/privacy</a>

## **Changes to this Policy**

The CBA may revise this policy from time to time.

## **Contact**

If a constituent has any questions regarding this Privacy Policy, they may contact the CBA by any of the following methods:

- Email: info@churchbenefitsassociation.org
- Writing: Church Benefits Association
  201 East Main Street, Suite 1405
  Lexington, KY 40507

Approved by the CBA Executive Committee on February 8, 2021.