



Passionist Alumni Council – Information Privacy Policy
REV 1.0 – APRIL, 2021

PASSIONIST ALUMNI – PERSONAL INFORMATION PRIVACY POLICY

A. BACKGROUND- SECURITY POLICY REQUIREMENTS TO SAFEGUARD ALUMNI CONFIDENTIALITY

The Passionist Alumni organization as managed and directed by the Passionist Alumni Council (PAC), was formed in 2018 to recruit, organize and promote activities for all Passionist Alumni members who have participated in formation for the Passionists of the Holy Cross Province.

We, the Passionist Alumni Council, value the privacy and confidentiality of all Alumni personal contact information provided to the Passionist Alumni Association. Passionist Alumni members and their activities are generally highly associated with many programs and activities that are initiated and conducted within the Passionist Holy Cross Provincial Office. For that reason the Passionist Alumni Privacy Policy should wherever possible closely align with and contain similar personal privacy goals and security requirements as those stated in the Passionist Holy Cross Provincial Privacy Policy (See [Privacy Policy Statement \(passionist.org\)](https://passionist.org) or Appendix A in this document). The combined strengths of privacy practices and information security enforcement from both Passionist's Alumni and the Holy Cross Provincial Privacy Policies will synergistically reinforce personal privacy protections benefitting both the members of the Passionist Alumni and the Passionist Provincial Office.



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Generally, other than *name, location of formation and years attended* (*‘student information’*) personal identifiable information of Passionist Alumni will not be used or released except as permitted under this policy or as required by law.

A. DEFINITION OF ALUMNI INFORMATION

Alumni information generally defined as personally identifiable information (PII) includes names, any addresses (physical/email/social media representation), telephone numbers (Landline/Cell) or any other information that can be traced to individual Alumni of the Passionist Congregation of the Holy Cross Province, which is gathered and stored after the individuals are no longer actively enrolled as Passionist students or seminarians in formation. This is inclusive of all alumni members who are active members of the Passionist Professed Community.

B. GENERAL ACCESS AND USE OF ALUMNI INFORMATION

Only Passionist Alumni Council members or Provincial Office Associates (Lay and Professed) of the Holy Cross Province who have a need to know in order to perform an authorized Passionist Alumni function or activity may access alumni information. Alumni information will be used for Passionist Provincial alumni relations, development and planning purposes in accordance with applicable policies of the Passionist Alumni Council. Contact information (email address and Mobile Cell numbers) will also be utilized by Passionist Alumni Council members to contact Passionist Alumni using the web-based digital communications platform called *Flocknote*. (See <https://flocknote.com/privacy/>)



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Passionist Alumni Council and designated Passionist Provincial Associates may release information to volunteers they designate to use information for such purposes as planning reunions, assisting Alumni Council committees, and facilitating approved Passionist Provincial activities.

C. CONDITIONS FOR RELEASE OF ALUMNI INFORMATION

Alumni information may be released in the following circumstances only with the prior written permission of individual registered alumni. Written permission includes digital indicators and selections of personal information collected and used by online approved Alumni Council websites/databases. These alumni databases can be updated by individual alumni themselves to record that publication of information is acceptable.

1. ***Forwarding Requests.*** Forward requests from Alumni proactively seeking the address (Physical and/or email) other Alumni. PAC member will first verify Passionist Alumni database profile of the alumni being sought to insure that personal information is permitted to be shared. PAC member will then pro-actively engage Alumni being sought, and secure their permission prior to release of their contact information or establishing information exchange.



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Alumni Council may at their discretion additionally volunteer known public facing social media (i.e. Facebook, Twitter, etc.) accounts of those alumni who are being sought by other alumni. Both Alumni making these requests and those alumni being sought must first pre-qualify as valid self-registered members of the Passionist Alumni database (see <https://www.passionistorderalumni.org>).

2. ***Interface with Associated Organizations of Passionist***

Province. Passionist Alumni Council may release Alumni information to organizations associated with the Passionist Provincial Office only if that organization certifies that:

- a. Organization or entity understands and complies with Personal Privacy/PII [Personally Identifiable Information] and Data Security policies as defined by both the policies of the Passionist Province of the Holy Cross and the Passionist Alumni Council and agrees to maintain the confidentiality of the information pursuant to these guidelines.

(At current revision release this Alumni privacy policy will not include applicable requirements of GDPR as stated in the Passionist Holy Cross Provincial Privacy Policy and as mandated in European Union and other countries outside of the United States)

- b. Organization or entity will utilize the information only in an activity or function that will directly serve a Passionist Alumni approved function or activity of the Passionist Province of the Holy Cross for a specified timeframe. Organization will safeguard all elements of Alumni PII and any use is contingent upon documented approval of Passionist Provincial Office.



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- c. Associated Organization or entity will not release or disclose the Alumni information to any other third party.

- d. Passionist Alumni Council and Passionist Provincial Office both share responsibility for insuring alumni personal privacy compliance is enforced and maintained by associated organizations.

D. RELEASE OF ALUMNI INFORMATION UNDER OTHER CIRCUMSTANCES

Passionist Alumni information may also be released under the following circumstances.

1. **Law Enforcement Agencies.** Requests from law enforcement agencies for alumni information should be directed to the Passionist Alumni Council and to the Passionist Provincial Office and/or their General Counsel.
2. **Subpoena or Court Order.** Alumni information will be released pursuant to court order or lawfully issued subpoena. Questions regarding court orders and subpoenas should be directed to the Passionist Provincial Office and/or their General Counsel.
3. **All Other Requests.** All other requests for Passionist Alumni information from persons or entities should be directed to the Passionist Alumni Council or their representative, as appropriate.



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APPENDIX A.

Privacy Policy Statement - The Passionists of Holy Cross Province

www.passionist.org

The Passionists are fully committed to protecting your right to personal privacy while you are visiting our website. We have created this Privacy Policy Statement to inform you how your personal information is collected and used.

The Passionists reserve the right at any time and without notice to change this Privacy Policy simply by posting such changes on our Site. Any such change will be effective immediately upon posting.

Because we want to demonstrate our commitment to your privacy, this Privacy Policy notifies you of:

- What personally identifiable information of yours is collected through the Site;
- Who collects such information;
- How such information is used;
- With whom your information may be shared;
- What choices you have regarding collection, use and distribution of your information;
- What kind of security procedures are in place to protect the loss, misuse or alteration of information under our control;
- And, how you can correct any inaccuracies in your information.



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Personal Information

When visiting our website, you may at some point choose to fill out one of our forms, make an online donation or request information from us. Please know that any personal information given, which may include name, postal address, phone number, birthdate or email address, will be used only in the manner to which you agree.

What we do with the information we collect

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will post the policy changes to our Web site to notify you of these changes and we will use for these new purposes only data collected from the time of the policy change forward. If you are concerned about how your information is used, you should check back at our Web site periodically.

Use of Cookies

From time to time, we may send a “cookie” to your computer. A cookie is a small piece of data that is sent to your Internet browser from our Web server and stored on your computer’s hard drive. A cookie cannot read data from your computer hard disk or read cookie files created by other web sites. Cookies do not damage your system. We use cookies to identify which areas of the website you have visited so the next time you visit, those pages may be readily accessible and can be delivered to you in a customized format. This allows us to make your website visits more compelling and relevant to you personally. You can reset your browser to refuse all cookies, or allow your browser to show you when a cookie is being sent. You can choose to not accept these cookies but your experience at our web site may be diminished and some features may not work as intended.

Use of Credit Card Information

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.



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Security

Our site has industry standard security measures in place to protect the loss, misuse, and alteration of the information under our control. Because we care about the security of your online transactions and your ongoing relationship with us, All information provided to the Passionists is transmitted using SSL (Secure Socket Layer) encryption. SSL is a proven coding system that lets your browser automatically encrypt, or scramble, data before you send it to us. These security measures make it difficult for anyone else to intercept credit card information you send to us. The Passionists will take all reasonable steps and precautions to protect your personal and financial information by following best business practices for online security of data.

You should be aware that these guidelines may not apply to websites you visit after leaving our website.

Opt-out

When you place your order or make your donation, you will occasionally receive email or postal mailings from us regarding our programs. If you decide in the future that you wish to stop either form of mail, please let us know by calling us, writing to us or send an email to: privacy@passionist.org and let us know that you do not want to receive further email or postal mail communication from us. All requests will be honored as quickly as possible.

Information We Share with Others

We may periodically share only your name and postal address with other organizations. We are extremely selective in choosing the organizations we associate with in this manner.

Your preferences about the Information We Collect

If you prefer that **we NOT share** any information about you with other organizations outside the Passionists of Holy Cross Province, please write to us at The Passionists, 660 Busse Highway, Park Ridge, Illinois 60068, call us at 1.847.518.8844, or toll-free at 1.800.295.9048 or email us at: privacy@passionist.org.



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Social Media Features

Our Website includes Social Media Features, such as the Facebook Like button and Widgets, such as the Share This button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. **This Privacy Policy does not apply to these features.** Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

Other Web Sites

Our Site contains links to other Web sites. Please note that when you click on one of these links, you are entering another Web site for which the Passionists of Holy Cross Province have no responsibility. We encourage you to read the privacy statements on all such sites as their policies may be different than ours.

Aggregate Information

We collect non-personal information about how users navigate through our web site. We analyze this statistical information in order to improve our site, and we may share this information with our affiliates or other outside companies. This aggregated information does not include any individual names or personal data, so it does not identify you or any other visitor in any way.

Your Consent

By using the Passionist's website, you consent to the collection and use of information as specified above. We will post changes to this policy on this web page so that you can always be aware of what information we collect, how we use it, and under what circumstances we disclose it.



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If You Do Not Consent

We will be required to remove you from our database.

European Union General Data Protection Regulation (GDPR)

Effective May 25, 2018, if you are a legal resident of the European Union / European Economic Area, you will be required to give your consent to the Passionists, even if you have already communicated with us. The Passionists have provided an opt-in here, which will be recorded in our database as consent given freely.

From the Website of the National Catholic Development Conference (NCDC):

According to [OneTrust](#), the primary concerns for nonprofits regarding the GDPR are acknowledging the rights, preferences, and consent of their supporters and donors.

The enactment of GDPR reiterates the four conditions that need to be present in order for consent from supporters to be valid:

1. **Data must be freely given:** The individual must consent without force, and they don't have to give unnecessary details in order to donate or participate in an event
2. **Data submission must be informed:** Communication must be very clear with regard to what is being asked of them, and how they opt in or out
3. **Data consent must be specific:** An individual's consent for one specific occasion can't be applied to future instances, and can't be changed later without further approval
4. **Data consent must depend upon a positive action to indicate:** An individual must tick a box, click "yes," or complete a form to indicate consent. Absence of action isn't allowed.



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Contact Information:

Address: The Passionists of Holy Cross Province
660 Busse Highway
Park Ridge, IL 60068

Phone: 800.295.9048

Email: Claire Smith, Director of Communications, csmith@passionist.org