



THE
LUTHERAN
WORLD
FEDERATION

A Communion
of Churches

lutheranworld.org

LWF DATA PROTECTION POLICY

The Lutheran World Federation (**LWF**), registration no.: CHE-107.855.339, registered at Chemin du Pavillon 2, 1218 Le Grand Saconnex, Geneva, Switzerland is committed to protecting and respecting the information shared with LWF. LWF is considered the “data controller” for the purposes of certain data protection laws and regulations.

This Data Protection Policy is written in accordance with the applicable data protection legislation, including Switzerland’s new Federal Act on Data Protection (“**nFADP**”) and the European General Data Protection Regulation 2016/679 (“**GDPR**”).

The purpose of this Data Protection Policy is to describe how personal data (“**Data**”) that LWF collects or holds on its employees, consultants, donors, contractors and any other person who shares personal data with LWF (“**Data Subjects**”) is used and to whom this Data may be disclosed.

When processing and collecting Data LWF is guided by the following principles:

- Using the Data only for the purposes stated below;
- Only collecting the Data it needs to fulfil these purposes;
- Not keeping the Data for longer than is necessary to fulfil these purposes;
- Communicating Data only to authorised organisations or persons who need it during LWF's activities;
- Informing Data Subjects in a clear and transparent manner about LWF's use of the Data and their rights.

1. Legal basis for Data processing

Data is collected and used for the following reasons:

- Compliance with legal obligations,
- Compliance with contractual obligations;
- Consent;
- LWF’s legitimate interests as a nonprofit organisation registered in Switzerland under Art. 60 Swiss Civil Code.

2. Purpose of data processing and types of Data collected

LWF regularly collects Data for purposes set out below. It is also indicated what types of personal data may LWF collect for the given purpose.

Purpose	Types of Personal Data
Recruitment	<p>LWF may collect personal data, including: full name, phone, email, gender, nationality, residence, work certificates, names of referees.</p> <p>As part of the Misconduct Disclosure Scheme LWF may collect personal data (name, work related information) from former employers to run background checks in the recruitment process.</p> <p>Personal data provided through LWF's online recruitment platform will be stored for the purpose of the application process. It is not shared with third parties without the written consent of each applicant.</p> <p>If a candidate is selected to travel to Geneva for an in-person interview additional information may be required to facilitate their travel, including their passport details.</p>
Onboarding	<p>LWF may collect personal data, including: full name, passport copy, birth certificate, statement showing no-criminal record, photograph.</p> <p>Additional information may also be collected from staff members within the LWF country programmes to facilitate travel to their duty stations e.g. passport details.</p> <p>If the new staff member is entitled to benefits for their spouse and children, their personal data will also be required to enrol in these benefits.</p>
Staff	<p>To onboard staff members (e.g. for payroll, pensions and insurance allocation) LWF may collect the following information: full name, date of birth, names of family members, social security number, bank account number, nationality, address, (if relevant) date of birth of children and spouse and date of marriage or civil union.</p> <p>LWF may collect personal data to facilitate travel for staff to their duty stations. In some cases, staff members travelling to duty stations may be required to complete a medical check to assess their fitness to travel. The outcome of the medical check may be shared with a medical doctor contracted by LWF based in the EU. In some cases, sensitive personal data regarding any disabilities of the person concerned, may also be required.</p>
Finance processes	<p>Where audits are required to comply with requirements from authorities or LWF donors, staff salary sheets and contracts may be shared with the auditors, personal data may include full names and bank account numbers.</p>
Fundraising	<p>To fulfil the requirements of donors with regards to the funding of projects, LWF may collect the following personal data: full name, DoB, email and address.</p>
External Personnel	<p>To facilitate the recruitment, onboarding and management of external personnel, LWF may collect the following personal data: full name, phone number, passport number, names of dependants, emergency contact names and numbers, bank account details, CV.</p>
Compliance processes	<p>If a Data Subject is subject to a complaint or investigation, LWF may collect the following personal data to conduct the investigation: full name, photograph, date of birth, address, bank details, gender, nationality, passport.</p> <p>Complying with counter-terrorism measures may also require accessing and handling of personal data before contracting staff and during employment.</p>
Country Programme Staff	<p>To facilitate the recruitment, onboarding and management of external personnel, LWF may collect the following personal data: full name, phone number, passport copy, names of dependants, emergency contact names and</p>

	numbers, bank account details, CV, birth certificate of children, statement showing no-criminal record, photograph.
External Partners	Where the Data Subject has opted to receive newsletters or communications, LWF will collect their email addresses and full names. Marketing communications will always include the option to unsubscribe from receiving further marketing communications.
Contact form	Where the Data Subject has used the contact form on the website LWF will collect email addresses and full names.
Donations	If a donation is made to LWF, LWF will collect the following personal data: full name, address, phone number, email address.
Projects (including projects in and outside Switzerland)	To implement its projects, LWF may regularly collect the following personal data of project participants: full name, ID, passport, photograph, nationality, legal status, email, phone number, marital status, disabilities (in case of accommodation/transportation special needs), address, health conditions, education profile, age, ethnic data, date of birth, bank account identification details. In some projects if necessary (e.g. for ensuring participants safety and security) LWF may collect the following data (not systematically and based on consent): ethnic group, GPS, sexual orientation, biometric data.
Incident reporting	In case a security incident occurs (e.g. violence against LWF staff members, natural disasters etc.) LWF may collect the following personal data to report and resolve the security incident: full name, ID/passport, photograph, date of birth, address. If necessary, sensitive personal data regarding any disabilities or medical information of the person concerned may also be required.
Conference organisation	To facilitate attendance at conferences and events (including the LWF General Assembly) LWF may collect the following personal data: full name, passport data, phone number, email, photo, proof of health insurance. If necessary, sensitive personal data regarding any medical conditions of the person concerned may also be required.

3. Data Handling Register

In compliance with Swiss regulations LWF establishes a Data Handling Register. A detailed summary of regular processes where data is handled can be found in this register. The register will be updated each year.

4. Rights of Data Subjects

Under the nFADP, Data Subjects have the following rights:

- **Right of access:** the Data Subject has at any time and without giving reasons, the right to ask LWF for copies of its Data.
- **Right to information:** the Data Subject has the right to be informed about how his or her Data is used. This Policy is intended to provide that information.
- **Right to withdraw consent:** where Data is processed based on consent, consent may be withdrawn at any time.

- **Right of rectification:** the Data Subject has the right to request LWF to rectify inaccurate Data and to complete incomplete Data.
- **Right to restrict processing:** the Data Subject may request to restrict the processing of Data, if permitted by law.
- **Right to erasure / deletion:** the Data Subject has the right to request LWF to erase or delete Data unless a legal basis or the legitimate interest of LWF requires or permits it to retain the Data.
- **Right to object to processing:** the Data Subject may, at any time, object to the processing of its Data.
- **Right to delivery or transmission of Data:** the Data Subject has the right to request the delivery or transmission of Data in a portable format when the processing of Data is carried out in an automated manner, based on consent or a contract
- **Right to lodge a complaint:** if the Data Subject is not satisfied with the way in which the Data is processed, he or she may lodge a complaint with the courts or with the federal data protection authority.

The exercise of these rights is free of charge. Any request concerning the processing of Data should be sent to the following email address: dataprotection@lutheranworld.org.

5. Disclosure of Data

LWF may disclose the Data to its employees, subcontractors, consultants and suppliers solely for the purpose of fulfilling its duties and fulfilling its mandate as a nonprofit organisation registered in Switzerland under Art. 60 Swiss Civil Code and provided that the legal requirements are met.

LWF may also share Data with individuals and external companies that provide services, such as a newsletter creation and distribution service, marketing analysis service or information and communication technology hosting service.

Such external service providers are bound by a confidentiality obligation and may only use Data in accordance with LWF's instructions and this policy.

Data may be disclosed to government, judicial or administrative authorities if required by law.

To protect the privacy and security of its Data Subjects, LWF may take reasonable steps to verify their identity before granting access or making corrections.

6. Transfer of Data outside Switzerland

Data is regularly processed in Switzerland and in several cases (e.g. conferences, Member Church related projects) data is also transferred abroad.

In case of the Country Programmes (listed on the LWF website at <https://lutheranworld.org/what-we-do/humanitarian-and-development-work/where-we-work>) Data may regularly be transferred abroad as well.

A separate policy for LWF World Service on Personal Data Protection is in place, which applies to LWF World Service projects in particular, where the ownership of data in projects is spelled out in contracts with partners. LWF ensures that Country Programmes sign up to this Policy to ensure equivalent data protection and adherence.

LWF is also subject to auditing requirements from its donors, where LWF is required to conduct an audit, personal data may be transferred to auditors outside of Switzerland. In such cases, LWF puts in place protection measures to ensure minimal transfer and protection of Data.

7. Marketing

Marketing communications (for example, newsletters) from LWF relating to LWF's activities may be sent to Data Subjects where they have opted to receive them.

Marketing communications from LWF will always include the option for the Data Subject to unsubscribe from receiving further marketing communications.

Anyone may unsubscribe at any time by sending an e-mail to info@lutheranworld.org and requesting that his or her name be removed from LWF's marketing lists.

8. Cookies

LWF uses cookies and other technologies on its website to enable the collection of certain information from the data subject's web browser. Cookies are widely used on the Internet.

Cookies are small text files that are placed on the Data Subject's computer by the websites visited. They are used to make websites work, or work more efficiently, and to provide information to the site owners.

The LWF may collect data such as location and type of device used from website visitors. Such data can be stored for up to 48 months. This is statistical data about LWF's browsing actions and patterns and does not identify any individual. LWF does not collect information identifying users personally (such as name, address, phone number or e-mail address) unless that information is voluntarily disclosed. LWF may request information that identifies users personally for the purpose of providing them with specific services they request, such as online applications.

Cookies help LWF to improve its services and to provide a better and more personalised service.

9. Safety

LWF undertakes to ensure the permanent security of the Data.

Data is protected against unauthorised processing by organisational and technical measures in line with international norms, quality standards and technical advances, in particular against the risks of falsification, destruction, theft, loss, copying and other unlawful processing.

LWF takes reasonable and appropriate measures to maintain the confidentiality and integrity of the Data and to prevent unauthorised use or disclosure of the Data in accordance with the nFADP.

LWF processes Data only in a manner compatible with the purpose for which it was collected.

Digital Data relating to data subjects including backups, are hosted in Switzerland on the servers owned by LWF, its external service providers as well as by external cloud solutions (Microsoft O365).

To the extent necessary for these purposes, LWF takes reasonable steps to ensure that the Data is accurate, complete, current and otherwise reliable with respect to its intended use.

10. How long does LWF keep the Data?

LWF retains Data only as long as is necessary to achieve the purposes for which it was collected, to meet the needs of LWF's purpose and to fulfil LWF's legal obligations.

To establish the retention period of the Data, LWF applies the following criteria:

- for provision of services, LWF retains Data for the duration of the services or service contract;
- if the Data Subject has consented to receive marketing messages (e.g. Newsletters), LWF retains the Data until the Data Subject unsubscribes;
- if cookies are placed on the Data Subject's computer, LWF only keeps the Data for the time necessary to achieve the purpose for which it was collected (for example, for one session for registration cookies or session identification cookies);
- LWF may retain Data for as long as it is necessary to fulfil its legal or regulatory obligations, and to enable LWF to exercise its rights (e.g. to bring an action before any court) or for statistical or historical purposes.
- When LWF no longer needs to use or retain the Data, LWF will delete it from its systems and files or anonymise it so that the Data Subject can no longer be identified.

11. Modifications to this Policy

LWF reserves the right to modify this Policy at any time.

Any changes to this Policy will come into effect when LWF notifies the Data Subject.

12. Contact Information

The LWF Department for Planning and Coordination is responsible for responding on data protection inquiries and to supervise compliance with the Policy.

Concerning the handling of personal data or data protection issues, inquiries can be sent by e-mail to dataprotection@lutheranworld.org.

13. Effective Date

This Policy has been updated on 29.10.2024