# Habitat-North Central Georgia Ministry Policy Manual

### **Privacy Policy**

Policy No.: 1.10 Adopted: 11/15/11 Re-Approved: 10/18/13 Page: 1 of 3

It is the policy of Habitat-NCG (i) to protect the privacy of donors, applicants for participation in the ministry's homeownership program, Habitat-NCG homeowners, and volunteers, and (ii) to comply with all laws and regulations pertaining to the privacy of the ministry's constituents and the protection of their private and confidential information. Toward that end, the ministry's staff, volunteers and members of the Board of Directors shall comply with the following Privacy Policy, which shall be distributed to homeowner applicants and posted on the ministry's website:

## **Privacy Policy**

#### 1. Collection of Personal Information

Habitat-North Central Georgia is committed to identifying the purposes for which information is collected at or before the time the information is collected and to documenting the purpose for which personal information is collected.

- a. We collect banking and credit card information to allow us to receive and process donations. In addition, we collect contact information to solicit donations, acknowledge donations, distribute our e-newsletter, and issue tax receipts.
- b. We collect family selection information (such as names, ages of family members, current address, work history, income, assets, debt, credit history, criminal history, legal residency status, and size of current dwelling) to determine if a family qualifies for participation in our homeownership program. We use this information to assess creditworthiness, need, stability of relationships, steady income, and willingness and ability to partner with Habitat-NCG.
- c. We collect mortgage application information to assess whether a homeowner applicant is creditworthy and qualifies for a loan. We also collect this information in order to (i) comply with the requirements of private and government grants that assist in the funding of our homes, and (ii) service our mortgages, which involves collecting mortgage payments and collecting and paying property taxes, insurance premiums, and other amounts which are escrowed as part of a homeowners monthly payment.
- d. We may collect personal information from past, present, and prospective volunteers for management and administrative purposes. We collect this information (i) to manage our volunteer force and recruit volunteers when needed, (ii) to keep our volunteers informed about our ministry through distribution of our e-newsletter, and (iii) to solicit and acknowledge donations, distribute our e-newsletter, and issue tax receipts
- e. We do not collect personal information indiscriminately. Both the amount and the type of information we collect is limited to that which is necessary to fulfill the purposes detailed above.

#### 2. Consent

a. Your consent to our collection and use of your private or confidential information may be given in writing, orally, electronically, or through an authorized representative, or it can be implied where the purpose of collecting, using, or disclosing the information would be considered obvious and you voluntarily provide such information for that purpose. Consent may also be implied when a person is given a reasonable opportunity to opt-out (such as in connection with e-newsletter distribution, completion of homeowner and

# Habitat-North Central Georgia Ministry Policy Manual

### **Privacy Policy**

Policy No.: 1.10 Adopted: 11/15/11 Re-Approved: 10/18/13 Page: 2 of 3

mortgage loan applications, or solicitation of contributions), and the person does not optout.

b. You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

#### 3. Use and Disclosure of Personal Information

Habitat-NCG does not use or disclose personal information for purposes other than those for which it was originally collected, except with your consent or as otherwise permitted by law. We do not sell or otherwise provide personal or confidential information to third-parties.

#### 4. Protection of Personal Information

Habitat-NCG is committed to protecting your personal information by security safeguards appropriate to the sensitivity of the information.

- a. We attempt to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held. We utilize appropriate security measures, such as firewalls and anti-virus software, in connection with our computer systems.
- b. When disposing of or destroying personal information which is no longer needed, we ensure that appropriate measures are taken regarding the disposal or destruction, including shredding, so as to prevent unauthorized parties from gaining access to the personal information.

#### 5. Retention of Personal Information

Habitat-NCG is committed to retaining your personal information only as long as necessary for the fulfillment of the purposes outlined above, or for the fulfillment of legal business purposes. Habitat-NCG has adopted a document retention policy to facilitate destruction of records when no loner necessary.

- a. We will retain personal information that has been used to make a decision about you for at least one year, even if retention is no longer necessary because the identified purpose for which the personal information was collected is no longer being served, to allow you access to the information after the decision was made.
- b. We will retain personal information that is the subject of a request for as long as is necessary to allow you to exhaust any recourse that you may have under federal legislation, even if retention is no longer necessary because the identified purpose for which the personal information was collected is no longer served.

### 6. Access to Personal Information

Upon receipt of a written request, Habitat-NCG will inform you of the existence, use and disclosure of your personal information and will give you access to that information after reasonable time for retrieval. You will be able to challenge the accuracy and completeness of the information and have it amended accordingly.

# Habitat-North Central Georgia Ministry Policy Manual

**Privacy Policy** 

Policy No.: 1.10 Adopted: 11/15/11 Re-Approved: 10/18/13 Page: 3 of 3

## 7. Correction of Personal Information

HCHFH is committed to maintaining as accurate, complete, and up-to-date personal information as is necessary for the purposes for which it is to be used. However, we do not routinely update personal information unless necessary to fulfill the purposes for which the information was collected or we receive a request from you to do so. If you are aware of changes to information you have provided to us, simply submit a written request and we will update our records accordingly.