DISTRICT PRIVACY POLICY TEMPLATE
(for districts not subject to the EU's General Data Protection Regulation)

Each district should adopt a privacy policy that describes how the district handles the personal data it collects, stores, transmits, shares, disposes of, or otherwise uses. Personal data includes a person's name, postal or email address, telephone number, gender, financial data, or other sensitive information that might identify him or her. To lean more, consult "Protecting Personal Data", an online course found on Rotary's Learning Center accessed through My Rotary.

Although Rotary does not require districts to have a privacy policy or to use this template, if your district has a privacy policy:

1. Members of your Rotary clubs, donors, and other district constituents will feel more confident about supporting your district.
2. It may help your district comply with local privacy laws.
3. It may help your district be more consistent when handling personal data and records.

If your district develops a privacy policy:

1. **Make it transparent.** Your district's privacy policy should be specific, but also transparent and easy to understand so your data subjects (members of clubs, donors, program participants, and other people who provide their personal data to the district) will know how their personal data will be collected, used, or otherwise processed.

2. **Understand how your district handles personal data.** As described above, any processing of personal data should be addressed in your policy. Remember that personal data includes any information related to an identifiable person and ranges from contact information and location data to photos and online identifiers. Consider consulting an attorney or a privacy specialist who is familiar with the laws in your area. Note that each district's privacy policy will likely be unique.

3. **Follow up.** Adopting a privacy policy is just the beginning. Consider the following:
   - Review district practices and programs and revise them to reflect the new policy.
   - Train members of clubs and program participants so they understand their roles and responsibilities when handling personal data. Training topics could include:
     - When it is appropriate to collect and share personal data
     - How to protect personal data while maintaining Rotary's networking tradition
     - How to properly secure and handle personal data
     - How to delete personal data properly when it is no longer needed
   - Notify club leaders that the privacy policy has been adopted or revised.
     - Your district will likely address legal issues specific to your geographic area. Clubs in your district might want to adapt parts of the Rotary District's privacy policy for their own privacy policies.

[Edit this template as is appropriate for your district's practices and programs. The highlighted text provides instructions or indicates where district-specific information should be inserted. Text that is not highlighted may also be edited.]

Introduction

Rotary District _____[insert number] and the _____[insert name of the district's charitable entity, if applicable] (individually or collectively, the "Rotary District") respect your privacy and are committed to protecting it by complying with this privacy policy ("Policy"). Safeguarding the data entrusted to our care by members of clubs within this Rotary District, program participants, and others is of the utmost importance to us.

This Policy describes our practices for collecting, using, protecting, disclosing, and disposing of personal data. It also describes the types of data that we may collect from you or that you may provide to us when you: [review and edit/add to the list of personal data sources below]
•   Visit our website, _____ [insert district website address] ("Website")
•   Join or maintain membership in a Rotary club or Rotaract club in this Rotary District
•   Interact with Rotary International ("RI"), The Rotary Foundation, and partner organizations
•   Register for or attend events we host
•   Use our services
•   Participate in our programs

Data We Collect About You and How We Collect It

We collect several types of personal data, including information by which you could be personally identified, such as [review and edit/add to the list of personal data your district collects] your name, postal address, email address, telephone number, gender, financial data, or other sensitive information that might identify you ("personal data").

We collect data from the following people: [review and edit/add to the list of data subjects below]
•   Users of our Website
•   Members of Rotary clubs and Rotaract clubs within this Rotary District
•   Members of Interact clubs within this Rotary District, if the Interactors' parents or legal guardian have consented
•   People who participate in Rotary District programs (if applicable, with the consent of parents or legal guardian)
•   Donors to the Rotary District _____'s Foundation [insert name of the district's charitable entity, if applicable]
•   People who participate in this Rotary District's events

We collect this data: [review and edit/add to the list of personal data sources below]
•   Directly from you when you provide it to us
•   From RI or from clubs within this Rotary District, The Rotary Foundation, and partner organizations

Data You Provide to Us

We collect personal data you provide when you interact with our Website or with the Rotary District, including any interaction offline or in person, such as when you: [review and edit/add any other occasions for data collection listed below]
•   Contact this Rotary District to make an inquiry, including an inquiry about membership
•   Join a Rotary club in this Rotary District or any associated Rotaract or Interact club

- Register on _____[insert name of district management service or software, if applicable]
- Use services on our Website, including:
  o Donating to the Rotary District's foundation
  o [insert additional web activities, if applicable]
- Register for Rotary District events
- Provide personal data on paper forms
- Submit applications for programs such as scholarships

Usage Details, IP Addresses, Cookies, and Other Technologies
As you interact with our Website, we may automatically collect data about your equipment and your browsing actions and patterns, including [insert details if your site uses cookies, or if it collects IP addresses or other data from users].

How We Use Your Personal Data
We use the personal data about you that we collect or that you provide to us to: [review and edit/add to the list below]
- Present our Website and its content to you
- Perform our core business purposes, including:
  o Fulfilling the Rotary District's obligations to members of Rotary clubs and Rotaract clubs within this Rotary District, program participants, and other individuals and entities, such as:
  o Processing financial transactions
  o Supporting the Rotary District _____'s Foundation [insert name of the Rotary District's charitable entity, if applicable], including fundraising efforts
  o Facilitating event planning
  o Communicating key organizational messages through Rotary District publications and other materials
  o Supporting the programs of this Rotary District or programs and members of Rotary clubs within this Rotary District
  o Complying with legal requirements

Disclosure of Your Personal Data
We may disclose aggregated data about our users, or data that cannot be used to identify any individual, without restriction.

We may disclose the personal data that we collect or that you provide as described in this Policy to: [review and edit/add to the reasons for disclosure listed below]
- Rotary International, to meet district program requirements and other obligations (read Rotary's privacy policy at rotary.org/privacy)
- The Rotary club or Rotaract club in which you are a member (if applicable)

We may also disclose your personal data:
- To comply with a court order, law, or legal process, or respond to a government or regulatory request
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of members of Rotary clubs or Rotaract clubs in this Rotary District, participants in this Rotary District's programs and events, Rotary clubs and Rotaract clubs in this Rotary District, RI, or others.

[Insert details about how your district will or will not share personal data with, or sell it to, third parties.]

Disposing of Your Personal Data
[Review and add/edit as needed to reflect how your district will properly and securely dispose of and how long your district will keep personal data.]
This Rotary District retains personal data identifying you for as long as necessary in the circumstances — for instance, as long you are a member of a club in this Rotary District or have a relationship with this Rotary District, or as may be needed to enforce or defend contract claims or as is required by applicable law. Personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it.

Choices About How We Use and Disclose Your Personal Data
We have created ways for you to control the use and disclosure of your data. [The administrator of your district's website should review the following and add to, revise, or delete as needed.]
For tracking technologies and advertising: You can set your browser to refuse all or some cookies or to alert you when cookies are being sent. If you disable or refuse cookies, note that some parts of the Website may be inaccessible to you or may not function properly.

Accessing and Correcting Your Personal Data
You may request access to your personal data, or ask for a correction or deletion, by:
• Emailing _____[insert email address]
• [Insert any other contact methods]

We may not accommodate a request to change or delete data if we believe the change or deletion would violate any law or legal requirement or cause the data to be incorrect.

Children
[Review and add/edit as needed, including indicating if your district's website is not intended for children under a certain age. Check local laws on this issue.]
Our Website is not intended for children. We do not knowingly collect personal data from or about children without parental consent. Children should not use or provide any personal data on our Website, or on or through any of its features, register on our Website, make any purchases through our Website, use any of the interactive or public comment features of our Website, or provide to us any personal data about yourself, including your name, address, telephone number, email address, or any screen name or user name. If we learn that we have collected or received personal data from a child, we will delete that personal data. If you believe we might have any personal data from or about a child, please contact us at _____ [insert email address].

Data Security
[Insert a statement about the technical and operational measures the district takes to secure personal data against accidental loss and against unauthorized access, use, alteration, and disclosure. Also note how the Rotary District will respond if someone violates this Policy.]

Changes to Our Privacy Policy
The Rotary District may change, add, or remove portions of this Policy at any time. These modifications shall take effect immediately on being posted on this page. The date the Policy was last revised is noted at the bottom of the page. It is your responsibility to review this Policy for any changes.

Contact Information
If you have any questions about our Rotary District's privacy protection practices, please contact us at _____[insert email address].

Last modified: _____[insert date of last revision]