

**LUTHERAN CHURCH-CANADA FINANCIAL MINISTRIES  
Operating as LUTHERAN FOUNDATION CANADA**

**OUR PRIVACY PROTECTION PLEDGE**

In order to comply with the federal government's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") that regulates the collection, use and disclosure of personal information in commercial activities, we have developed this Privacy Protection Pledge and a Privacy Policy. Both of these documents apply to the collection, use, disclosure and retention of personal information by us, under any business name that we may use, now or at any time in the future.

The following is a brief summary of our privacy practices:

**What is personal information?**

Personal information is any information that can be used to identify, distinguish or contact a specific individual.

**Why do we collect personal information, and how do we use it?**

In carrying out our organizational activities, we collect and use personal information about the pastors, rostered church workers, congregation members, investors, donors, employees, independent contractors, missionaries, convention delegates, seminar participants, magazine subscribers, volunteers and other constituents or stakeholders of Lutheran Church-Canada Financial Ministries or any congregation within Lutheran Church-Canada (collectively, the "**LCCFM Stakeholders**") only for the following purposes:

1. To identify the LCCFM Stakeholders;
2. To establish and maintain responsible relationships with the LCCFM Stakeholders;
3. To understand, develop and/or enhance the needs, desires, concerns or opinions of the LCCFM Stakeholders;
4. To carry out our organizational activities, e.g., rosters of congregations and church workers, etc., all with a view to advancing the goals of our Mission Statement;
5. To manage and develop our business and operations; and
6. To meet legal and regulatory requirements.

**When do we disclose personal information?**

We may need to disclose some personal information about an LCCFM Stakeholder in each of the following situations:

1. To our employees and members of our internal audit team;
2. To our external auditors or legal counsel;
3. To a person who is an authorized agent of that LCCFM Stakeholder. For example, we may provide information about an individual's investments or donations to that individual's legal, accounting or financial advisors;

## Exhibit 9.3.2

4. To a third party who requires such information in order to assist us and/or a Lutheran Church-Canada congregation in the general administration and/or operation of our business and/or the business of any such congregation and/or the supply of products and/or services to that LCCFM Stakeholder;
5. To a third party who requires such information and who is part of Lutheran Church-Canada. For example, we may provide information about a pastor or a rostered church worker to a Lutheran Church-Canada congregation that is seeking a pastor or a rostered church worker;
6. To a third party with whom we may at any time in the future be negotiating for the purpose of that third party taking over some or all of our activities.
7. To a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by the disclosure of the information;
8. To a third party where that LCCFM Stakeholder has consented to such disclosure; and
9. To a third party where such disclosure is required or permitted by law.

Any disclosure of an individual's personal information that is contemplated in any of items 1 to 8, both inclusive, will be made on a "need to know" and, where appropriate, on a confidential basis. We use contractual or other means to protect the information and to make sure that the information is used only for the purpose(s) for which it was disclosed.

### **How do we protect personal information?**

In order to protect the personal information of an LCCFM Stakeholder, we will:

1. Not collect, use or disclose personal information for any purpose other than those identified above, except with further consent. Consent for any of the identified purposes or for any additional purpose can be provided in writing, orally or electronically. Consent can be express or it may be deemed or implied in appropriate circumstances;
2. Protect personal information with security safeguards that are appropriate to the sensitivity of the information;
3. Protect the confidentiality of personal information when dealing with other organizations;
4. Use reasonable efforts to keep personal information as accurate and up-to-date as is necessary for the purposes for which it is to be used and/or disclosed; and
5. Respond to any request an LCCFM Stakeholder may make for access to his/her personal information. We will need to verify the identity of that Stakeholder before we can respond to his/her request. If we deny that Stakeholder's request for access to his/her personal information, we will provide an explanation in writing.

### **What are your choices?**

Your consent is needed for us to continue to collect, use and disclose your personal information for the purposes identified above. You do have choices, and you may refuse or withdraw your consent as follows:

1. You may refuse to provide your personal information to us. You may also withdraw your consent for us to collect, use or disclose your personal information at any time, subject to legal or contractual restrictions and reasonable notice. However, in either case, this may

Exhibit 9.3.3

limit or eliminate altogether our ability to serve you as a Lutheran Church-Canada Financial Ministries investor, donor, employee, independent contractor, seminar participant, magazine subscriber, volunteer or other constituent or stakeholder, to involve you in other Lutheran Church-Canada Financial Ministries organizational activities and/or to communicate with you.

2. You may have your name removed from our telephone, mail or e-mail lists. We use these lists to inform you of relevant activities or initiatives that we are contemplating or undertaking and that we think may be of interest to you.

If you have any questions or concerns about our privacy practices, please contact our Privacy Officer by:

1. telephone: \_\_\_\_\_
2. mail: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
3. e-mail: \_\_\_\_\_

**If you do not advise us to the contrary, we assume that we have your consent to collect, use and disclose your personal information (including personal information that we have previously collected) for the identified purposes and in a manner consistent with our Privacy Policy. Please note that our Privacy Policy only applies to personal information and not to corporate information.**

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's Internet web site at: [www.privcom.gc.ca](http://www.privcom.gc.ca)