

Privacy Policy

This Privacy Policy governs the manner in which Luena Foundation collects, uses, maintains, and discloses information collected from users (each, a "User") of the Luena Foundation website ("Website"). This Privacy Policy applies to the Website and all products and services offered by Luena Foundation.

Luena Foundation values your privacy and is dedicated to safeguarding your Personal Data (as defined below). This privacy policy is designed to inform you about how we manage your Personal Data when you visit our website (irrespective of your location) and to explain your privacy rights and the legal protections afforded to you. This includes any data you may voluntarily provide, such as when making a financial donation, subscribing to our newsletter, applying for partnership, or requesting further information about Luena Foundation.

It is essential that you review this privacy policy alongside any data protection policy we may offer on specific occasions when collecting or processing Personal Data about you. This ensures you have a complete understanding of how and why we utilize your data. This privacy policy is supplementary to any other notices and privacy policies that may be applicable at various times and is not intended to supersede them.

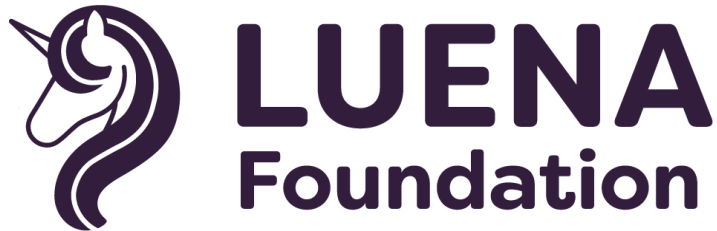
I. Amendments to this Privacy Policy

We reserve the right to modify this Privacy Policy periodically. Such changes will become effective immediately upon being posted on the Site and will apply to your continued use of the Site after the stated "effective date" above. By continuing to use the Site after the effective date, you acknowledge that the collection, utilization, and sharing of your information are subject to the updated Privacy Policy.

Unless we have obtained your consent or as permitted or mandated by applicable law, any personal information collected through the Site will be handled in accordance with the terms of the Privacy Policy in effect at the time of collection.

II. Information Gathering

Information Provided by You: We may gather information from various sources to operate the Site, fulfill our mission, adhere to laws, and accomplish other purposes detailed in this policy.



Information provided directly by you, such as when you sign up for email updates, make a donation, become a fundraiser, engage with interactive features of the Site (including submission of contact forms), or communicate with us, is collected. Examples of the types of information we may collect include:

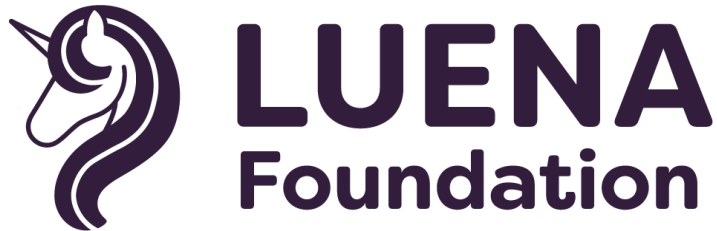
- first and last name
- date of birth
- mailing address
- telephone numbers
- business/organization name
- email address
- credit card, bank information or billing information

Information Automatically Collected When You Use the Site: Upon accessing or using our Site, we automatically collect information about you through Google Analytics, including:

- Details regarding your usage, such as browser type, access times, pages viewed, your IP address, and the page visited before arriving at our Site.
- Information pertaining to the computer or mobile device utilized to access our Site, including hardware model, operating system and version, unique device identifiers, and mobile network information.
- We utilize various technologies for information collection, including sending cookies to your computer or mobile device. A cookie is a small text file that may be saved by a website, online application, or email to your internet browser and/or computer's hard drive for subsequent visits to the Site or other sites.

Information Acquired From External Sources: We may acquire information from other sources and merge it with data collected through our Site. For instance, if you engage with the Site through a social media platform, we may access specific information from that platform, such as your name, account details, and friends lists, in accordance with the platform's authorization procedures.

III. Utilization of Information



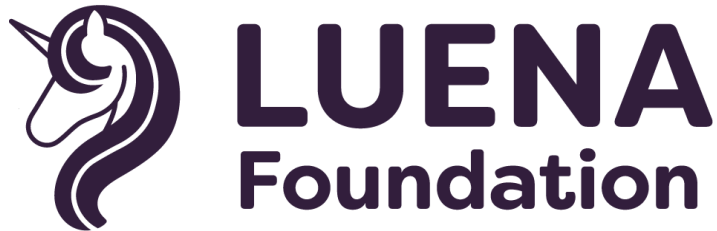
We may employ the information collected about you for the purposes outlined in this Privacy Policy or otherwise communicated to you through the Site or during collection. For example, we may utilize such information to:

- Maintain and enhance the functionality of our Site;
- Provide technical notifications, updates, security advisories, and assistance messages;
- Respond to inquiries, comments, and requests;
- Facilitate and manage donations made to us;
- Provide you with updates about our work or activities we believe may interest you;
- Conduct fundraising activities in line with our internal policies and procedures
- Distribute our newsletters and publications, subject to your consent;
- Analyze trends, usage, and activities associated with our Site;
- Customize and enhance the Site experience, and deliver content or features aligning with user preferences;
- Ensure compliance with applicable laws and regulations;
- Link or combine data obtained from external sources to better understand your needs and offer improved service; and
- Fulfill any other purpose for which the information was collected.

IV. Information Sharing

We may disclose information about you as detailed below or as otherwise stipulated in this Privacy Policy:

- With partners, vendors, consultants, and service providers necessitating access to such information to perform tasks on our behalf (e.g., administering the Site, managing IT systems, conducting online marketing, facilitating online payments with our third party donation processors);
- In response to a valid information request, if we believe disclosure is in accordance with applicable laws, regulations, or legal proceedings, or as required by law, rule, or regulation;
- If we suspect your actions contravene the essence or terms of our user agreements or policies, or to safeguard the rights, assets, and safety of Luena Foundation or others;
- In connection with or during discussions for any merger, asset sale, financing, or acquisition involving all or part of our organization; and
- With your consent or at your direction, including instances where we notify you via the Site that your provided information will be shared in a specific manner and you agree to such sharing.



We may also share aggregated or de-identified information that cannot reasonably identify you. **Under no circumstances will Luena Foundation lease, sell, or exchange your data with other entities except for reasons enumerated above.**

Social Sharing Features:

The Site may incorporate social sharing features and integrated tools (e.g., Facebook's "Like" button), allowing you to share your Site activities on various platforms and vice versa. Usage of such features facilitates information sharing with your friends or the public, contingent upon the settings you configure with the providing entity. For further details on data collection and processing associated with social sharing features, refer to the privacy policies of the relevant providers.

Links to External Websites:

The Site may contain links to other sites, which may employ cookies for visitor information collection. We lack control over the cookie usage of linked sites and do not bear responsibility for their privacy practices or content.

We Do Not Knowingly or Intentionally Collect Information From Children. Luena Foundation does not knowingly gather, utilize, or disclose personal information from minors, nor do we knowingly permit them to provide us with their personal information without verifiable consent from a parent or guardian. If you are under 18, please refrain from sending any personal information to us, such as your name, address, phone numbers, or email address, unless you have obtained permission from your parent or guardian. Should we become aware that we have collected personal information from someone under 18 without parental or guardian consent, we will promptly delete such information. In compliance with specific state regulations, minors under 18 may request the removal of content and information they have posted on the website. If you suspect that we may have collected information from or about anyone under 18, or if you would like to request the removal of content and information, please contact us at admin@luena.org.

V. Security Measures



Luena Foundation employs reasonable measures to safeguard your information from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. However, please be aware that despite our efforts, no security measure can guarantee absolute protection. We advise reviewing the privacy policies of external sites linked from our Site to understand their data collection, usage, and sharing practices. Luena Foundation disclaims responsibility for the privacy statements or content of external sites.

Luena Foundation employs security measures within our systems, ensuring that only authorized personnel have access to physical copies of your personal information. All online transactions (donations made to Luena Foundation) are conducted by a third party on our behalf who maintain the PCI validation: "SAQ A". Transmission between the donors, our third-party donation processor, and our e-payment processors is encrypted using 256bit SSL/TLS.

VI. Your Options

You may request updates, corrections, or deletions of your information at any time by contacting us via email at admin@luena.org. Kindly note that we may retain certain data as required by law or for legitimate organizational purposes. Additionally, cached or archived copies of your information may be preserved for a specific period.

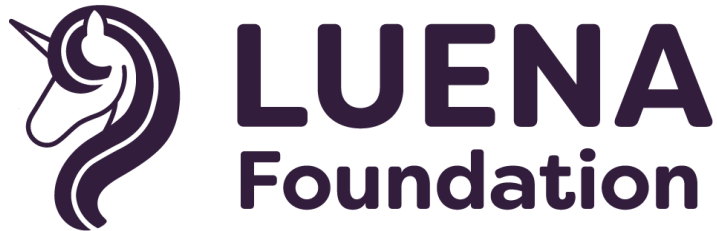
Regarding the use of cookies: most web browsers are configured to accept cookies by default. However, you can typically adjust your browser settings to reject or remove cookies. Modifying or rejecting cookies may impact Site availability and functionality. The "help" section of your browser provides guidance on managing cookies. Please note that our Site does not control or guarantee the effectiveness of browser-based cookie management tools.

Promotional Communications:

You can opt out of receiving promotional emails or messages from Luena Foundation at any time and for any reason by contacting us using the details provided below.

VII. Donor Bill of Rights

Luena Foundation is committed to upholding the rights of our donors. We recognize the importance of transparency, trust, and respect in all our interactions with those who generously support our mission. Therefore, we adhere to the following principles:

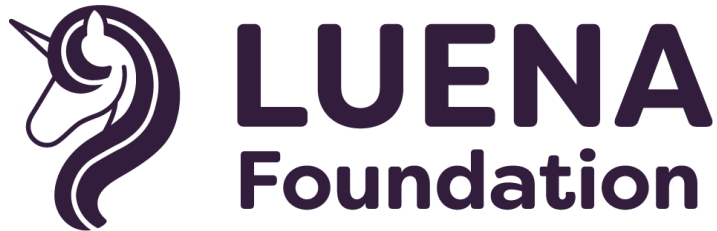


- To be Informed: Donors have the right to be informed about our mission, how their donation will be used, and our capacity to effectively utilize their contributions.
- To Transparency: Donors have the right to access our most recent financial statements and to understand how their donations are being utilized.
- To Privacy: Donors have the right to privacy and confidentiality regarding their personal information. We will not share or sell donor information to third parties.
- To Choose: Donors have the right to choose how their donation is used and whether their name will be publicly associated with their contribution.
- To Impact: Donors have the right to expect that their donations will be used effectively to advance our mission and make a positive impact.
- To Recognition: Donors have the right to appropriate recognition and acknowledgment for their contributions, unless they choose to remain anonymous.
- To Communication: Donors have the right to receive prompt and accurate communication about our organization, including updates on our programs, activities, and achievements.
- To Feedback: Donors have the right to provide feedback, ask questions, and receive timely responses from our organization.
- To Respect: Donors have the right to be treated with respect, gratitude, and appreciation for their generosity and support.
- To Trust: Donors have the right to trust that their donations will be used ethically and responsibly in accordance with our mission and values.

Luena Foundation is dedicated to upholding these rights and ensuring that our donors feel valued, respected, and appreciated for their commitment to making a difference in the lives of those we serve.

VIII. European Rights (GDPR Compliance)

You retain the right to request that we refrain from processing your Personal Data for marketing purposes. We typically notify you (prior to collecting your Personal Data) if we plan to utilize your Personal Data for marketing purposes or if we intend to disclose your information to any third party for such intentions. You can exercise your right to prevent such processing by selecting specific options on the forms we employ to gather your Personal Data. Alternatively, you may contact us via the "Contact Us" section on our website to exercise this right.



According to European data protection legislation, under specific circumstances, you possess the right to:

- Request access to your Personal Data
- Request correction of your Personal Data
- Request deletion of your Personal Data
- Object to the processing of your Personal Data
- Request restrictions on the processing of your Personal Data
- Request the transfer of your Personal Data
- Withdraw your consent

Furthermore, if you believe that Luena Foundation has failed to adhere to its obligations under this Privacy Notice or European legislation, you have the right to lodge a complaint with an EU Data Protection Authority.

IX. Contact Us

If you have any questions about this Privacy Policy, please do not hesitate to contact us at admin@luena.org.