

Privacy Policy

Catholic Charities of Southwest Kansas

Introduction

Catholic Charities of Southwest Kansas respects the privacy of our clients, visitors and supporters. The purpose of this document is to identify the information that we collect about people, and how we use and protect that information. This policy covers online privacy, donor privacy and health care privacy.

Acceptance of Terms

This privacy policy applies to all information received by Catholic Charities of Southwest Kansas, both online and offline, on any website, mobile application and social media, as well as any electronic, written, or oral communication. By visiting Catholic Charities of Southwest Kansas, using our services and platforms, or submitting your information to us or any of our staff and volunteers, you agree to the terms of this policy and to our processing of personal information for the purposes stated below.

Online Privacy Policy

Catholic Charities of Southwest Kansas collects two types of information from online visitors: (1) personal and (2) non-personal or anonymous information. Users can always visit the Catholic Charities of Southwest Kansas website anonymously without revealing any personal information.

Personal Information

Catholic Charities of Southwest Kansas collects and uses personal information from online visitors only when that information has been voluntarily provided to us through social channels, web forms, or through one of the email addresses, phone numbers, or physical addresses listed on the website. Personal information refers to any information, or set of information that could be used to identify you. That information may include name, address, telephone number, email address and comments. Catholic Charities of Southwest Kansas may store personal information such as addresses, phone numbers, and email addresses received from online visitors in our development software system. Catholic Charities of Southwest Kansas uses your personal information for internal purposes only, including:

- Registration for special events
- Distribution of receipts for donations
- Donation thank you letters
- Distribution of news, resources, upcoming fundraising events and other activities
- Internal analysis and record keeping
- As required by law or judicial proceeding

Additionally, Catholic Charities of Southwest Kansas may publicly recognize a donor by publishing a donor's name unless the donor explicitly chooses to be anonymous when making a donation.

Catholic Charities of Southwest Kansas does not sell, trade, rent or share names, addresses, telephone numbers, or e-mail addresses of our online visitors or donors with any other person or organization. To protect the privacy of your personal information, only authorized staff have access to our development software system, and all information is treated with confidentiality. Users may opt to stop receiving communications from Catholic Charities of Southwest Kansas at any time. To stop receiving mail, phone or e-mail information, you may contact the Director of Communication and Development by calling 620-792-1393 or sending a letter to:

Catholic Charities of Southwest Kansas
Attn: Rebecca Ford
2201 16th St
Great Bend KS 67530

Non-Personal Information

Catholic Charities of Southwest Kansas and our partners may collect additional information that does not personally identify you. Our partners include, but are not limited to Google Analytics. We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect anonymous information so that we can identify website trends without identifying individual visitors. To do this, Google Analytics uses “cookies”, which are text files placed on your computer, to help us analyze how users use our site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Accordingly, we may collect non-personal information from:

- **From Your Activity:** Information that we or our Partners may automatically collect when you visit, access, and/or use the Platform, including, but not limited to your IP address, Internet service provider, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, which sections of the you visit, number of links you click while on the Platform, search terms, operating system, and technical information about your mobile device.
- **From Cookies, JavaScript Tags:** Information that we or Partners automatically collect using technical methods, including but not limited to “cookies”, JavaScript tags, web beacons, pixel gifs, Flash cookies, and other locally stored objects. Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to enhance your experience using our website and to allow us and our Partners to collect Other Information. You may be able to disable cookies and/or other locally stored cookies by disabling them in your browser or on your device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies.
- **From you,** when you voluntarily provide information to us that does not identify you personally.

The Information Collected by or Through Third-Party Advertising Companies

We may share non-personal information about your activity on our website with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on our website and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such non-personal information for such purposes. Pixel tags enable us, and these third-party advertisers, to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site.

How We Use and Share Your Information

We use your personal and non-personal information to help us provide services, process your donations, solicit your feedback, inform you about our products and services and those of our third-party marketing partners, to administer our rewards and promotional programs, and to improve our Services to you.

Accessing and Modifying Information and Communication Preferences

Upon request, Catholic Charities of Southwest Kansas will grant individuals reasonable access to personal information that we hold about them. For example, website visitors who have provided personal information to us may review and/or make changes to the same by contacting Catholic Charities of Southwest Kansas. In addition, individuals may manage their receipt of marketing communications by clicking on the “unsubscribe” link located on the bottom of any Catholic Charities of Southwest Kansas marketing e-mail. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

How We Protect Your Information

We take commercially reasonable steps to protect your personal and non-personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from our platforms may not be secure and you should therefore take special care in deciding what information you send to us via e-mail.

Links and External Websites

Our online platforms may contain links to third-party websites. Catholic Charities of Southwest Kansas has no control over the privacy practices or the content of those websites and is therefore not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites. We often provide links to third-party sites (e.g. Facebook, Twitter, YouTube etc.). In those instances, please review the privacy policies of those sites. Unless stated otherwise, links to third-parties are not endorsements of their site, content or products and services. Throughout our web pages, we provide links to other servers which may contain information of interest to our readers. We take no responsibility for, and exercise no control over, the organizations, views, or accuracy of the information contained on other servers. Creating a text link from your Web site to our site does not require permission. If you have a link you'd like us to consider adding to our web site, please send an email to rford@catholiccharitiesswks.org with the subject “Link request.”

Children

We do not knowingly collect personal information from children under the age of 13 through our platforms. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information through any of our platforms without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will delete that information from our databases.

Donor Privacy Policy

This section of our Privacy Policy relates specifically to donors.

Personal Information

“Personal Information” is information that identifies you personally, such as your name, address, telephone number, and email address. Catholic Charities of Southwest Kansas collects and stores personally identifiable information to facilitate payments and donations, and to be added to our mailing list only when you voluntarily submit such

information via email or a submitted form. Here are some examples of ways in which we may collect your information.

- When you request information through one of our web forms, one of the email addresses identified on our website, or otherwise contact us in person, by phone or email, we may then collect your name, address and email in order to respond to that inquiry. We may also use your email to contact you in the future about our programs that may be of interest.
- We may collect your name, email address and other contact information if you register for an event.
- We may collect your name, email address, telephone number and payment information when you make a contribution or service payment, either on our website, over the phone or by mailing in a check.

The above list provides a sample of personal information that may be collected by Catholic Charities of Southwest Kansas. From time to time, we may collect personal information from you in ways not described above.

Use and Disclosure of Personal Information

The personal information gathered by Catholic Charities of Southwest Kansas about our donors is used for internal purposes only.

- We will not sell, trade, or share your personal information, collected on the website or through any other business activities with anyone else.
- We will not send you mailings on behalf of other organizations.
- We will only share your personal information if you give us specific permission to do so.
- We will collect payment information, billing address and other information necessary to process a donation or event registration.
- We will use your information to comply with the law or in the good faith belief that such action is necessary to conform to the requirements of law or comply with legal process served on us, protect and defend our rights or act in urgent circumstances to protect the personal safety of others.
- We will use the personal information to protect against potential fraud. We may verify with third parties the information collected in the course of processing a payment, gift, event registration or other donation. If you use a credit or debit card on the website, we may use card authorization and fraud screening services to verify that your card information and address matches the information that you supplied to us and that the card being used has not been reported lost or stolen.
- You have the right to review information that we have collected about you. To review that information please contact us in writing at Catholic Charities of Southwest Kansas, 906 Central Ave, Dodge City KS 67801.
- **Important:** We will share portions of your information if we believe it is necessary to protect against harm to the public or us. This is done as required or permitted by law.

Credit Card Information

Catholic Charities of Southwest Kansas accepts credit card payments via PayPal through our web site, by phone, and by postal mail for products, services and donations. All of your information is protected by SSL, which ensures that your information is encrypted and can't be stolen when it's sent across the internet before being stored on heavily guarded servers. To the extent any donations are processed through a third-party service provider, our donors' information will only be used for purposes necessary to process the donation.

We strongly discourage the transmission of confidential or sensitive credit card information to us directly using email. Contributions and purchases may also be made by calling 620-227-1562. Information is provided on our Donations Page for those who wish to make contributions through postal mail.

Contact Information

If you have questions or concerns about this Donor Privacy Policy or if you wish to be removed from our e-mail/postal contact lists, please contact the Director of Communication and Development by calling 620-792-1393 or sending a letter to: Catholic Charities of Southwest Kansas, Attn: Rebecca Ford, 2201 16th St, Great Bend KS 67530.

Health Care Privacy Policy

This section of our Privacy Policy describes how health information about you may be used and disclosed and how you can get access to this information. Please review carefully.

Understanding Your Health Information

Each time you visit a health care provider, a record of your symptoms, results, diagnosis, treatment, and future care is made. This information is referred to as your health or medical record and serves a variety of purposes, such as documenting your diagnosis and treatments, verification of services and financial account, and to continually assess and improve our services to you.

The Health Insurance Portability and Accountability Act (HIPAA) clearly defines what kind of information is to be included in your “designated medical record” or “case record” as well as some material, known as “Psychotherapy Notes” which is not accessible to insurance companies and other third-party reviewers and in some cases, not to the patient himself/herself.

HIPAA provides privacy protections about your personal health information, which is called “protected health information (PHI)” which could personally identify you. PHI consists of three (3) components: treatment, payment, and health care operations.

1. **Treatment** refers to activities in which we provide, coordinate or manage your mental health care service or other services related to your health care. Examples include a counseling session or communication with your primary care physician about your medication or overall medical condition.
2. **Payment** is when Catholic Charities of Southwest Kansas obtains reimbursement for your mental health care or other services related to your health care.
3. **Health care operations** are activities related to our performance such as quality assurance. In our agency, the best example of health care operations is when a supervisor reviews our work together to see if your care is appropriate and best meeting your needs.

The use of your protected health information refers to activities our agency conducts for scheduling appointments, keeping records, and other tasks related to your care. Disclosures refer to activities you authorize such as the sending of your protected health information to other parties (i.e., your primary care physician, the school your child attends).

Uses and Disclosures of Protected Health Information Requiring Authorization

HIPAA requires authorization and consent for treatment, payment and health care operations. Catholic Charities of Southwest Kansas may disclose PHI for the purposes of treatment, payment and health care operations with your consent.

- **Treatment:** We will use and disclose your protected health information to provide, coordinate, or manage your health care and any related services. This includes the coordination or management of your health care. We will also share information that you provide with supervisors or our internal team members so that they can assist in determining the best course of care and services for you.
- **Uses and Disclosures for Payment:** We will make uses and disclosures of your personal health information as necessary for the payment purposes of those health professionals and facilities that have treated you or provided services to you. For instance, we may forward information regarding your health care services and treatment to your insurance company to arrange payment for the services provided to you or we may use your information to prepare a bill to send to you or to the person responsible for your payment.
- **Healthcare Operations:** We may use or disclose, as-needed, your protected health information for our own health care operations in order to provide quality care to all consumers, to assess staff training needs or to ensure the efficiency of program operations. Health care operations include such activities as:
 - Quality assessment and improvement activities,
 - Employee review activities,

- Training programs including those in which students, trainees, or practitioners in health care learn under supervision,
- Accreditation, certification, licensing, or credentialing activities,
- Review and auditing, including compliance reviews, record reviews, legal services and maintaining compliance programs, or
- Business management and general administrative activities.

You have signed this general consent to care and authorization to conduct payment and health care operations, authorizing Catholic Charities of Southwest Kansas to provide treatment and to conduct the administrative steps associated with your care.

Additionally, if you ever want Catholic Charities of Southwest Kansas to send any of your protected health information of any sort to anyone outside this office, you will always first sign a specific authorization to release information to this outside party. A copy of that authorization form is available upon request. The requirement of you signing an additional authorization form is an added protection to help insure your protected health information is kept strictly confidential. An example of this type of release of information might be your request for a counselor to talk to your child's school teacher about his/her ADHD condition and what this teacher might do to be of help to your child. Before talking with that teacher, you will have first signed the proper authorization consenting for the counselor to have such communication.

Counselor's Psychotherapy Notes, unless otherwise permitted or required by law: In recognition of the importance of the confidentiality of conversations between therapist-patient in treatment settings, HIPAA permits keeping "psychotherapy notes" separate from the overall "designated medical record". "Psychotherapy notes" are the therapist's notes "recorded in any medium by a mental health provider documenting and analyzing the contents of a conversation during a private, group, or joint family counseling session and that are separated from the rest of the individual's medical record." "Psychotherapy notes" are necessarily more private and contain much more personal information about you hence, the need for increased security of the notes. "psychotherapy notes" are not the same as your "progress notes" which provide the following information about your care each time you have an appointment: medication prescriptions and monitoring, assessment/treatment start and stop times, the modalities of care, frequency of treatment furnished, results of clinical tests, and any summary of your diagnosis, functional status, treatment plan, symptoms, prognosis and progress to date.

Confidentiality of Alcohol and Drug Abuse Client Records: The confidentiality of alcohol and drug abuse client records maintained by Catholic Charities Covered Programs is protected by federal law and regulations. Generally, the Covered Program may not say to a person outside the program that you attend a drug or alcohol program, or disclose any information identifying you as an alcohol or drug abuser unless: (1) you consent in writing; (2) the disclosure is allowed by law; or (3) the disclosure is made to medical personnel in a medical emergency or to qualified personnel for research, audit, or program evaluation. Federal law and regulations do not protect any information about a crime committed by you either at our Covered Programs or against any person who works for the Covered Program or about any threat to commit such a crime. Federal laws and regulations do not protect any information about suspected child abuse or neglect from being reported under State law to appropriate State or local authorities.

You may, in writing, revoke all authorizations to disclosure of protected health information at any time. You cannot revoke an authorization for an activity already done that you instructed your counselor to do.

Uses and Disclosures Not Requiring Consent or Authorization

By law, protected health information may be released without your consent or authorization under the following conditions:

- Suspected or known child abuse or neglect
- Suspected or known sexual abuse of a child
- Adult and Domestic abuse
- Health oversight activities (i.e. licensing boards in Tennessee)
- Judicial or administrative proceedings (i.e. you are ordered here by the court)
- Serious threat to health or safety (i.e. our "Duty to Warn" Law, national security threat)

For all other disclosures of your PHI we must obtain a written authorization for release of information from you. This authorization must include:

- Specific person to whom the information is being released
- Purpose of the release
- Date of the release -time frame
- Specific information or documents that are being released
- Opportunity to revoke consent.

Your Health Information Rights

Your health record is the physical property of the facility that compiled it, but the information belongs to you. You have several rights regarding this information, such as, a copy of this information and requesting certain restrictions and amendments to your information. More specifically, you have the right to:

- Request restrictions on certain uses and disclosures of your protected health information which we may or may not agree to but if we do, such restrictions shall apply unless our agreement is changed in writing
- Receive confidential communications by alternative means and at alternative locations. For example, you may not want forms mailed to your home address so we will send them to another location of your choosing
- Inspect and copy your protected health information in the designated record and any billing records for as long as protected health information is maintained in the record
- Insert an amendment in your protected health information, although the therapist may deny an improper request and/or respond to any amendment(s) you make to your record of care
- An accounting of non-authorized disclosures of your protected health information
- A paper copy of notices/information from Catholic Charities, even if you have previously requested electronic transmission of notices/information
- Revoke your authorization of your protected health information except to the extent that action has already been taken

For more information on how to exercise each of these aforementioned rights, please do not hesitate to ask your therapist/staff member for further assistance on these matters. Catholic Charities of Southwest Kansas is required by law to maintain the privacy of your protected health information and to provide you with a notice of your Privacy Rights and our duties regarding your PHI. Catholic Charities of Southwest Kansas reserves the right to change our privacy policies and practices as needed with these current designated practices being applicable unless you receive a revision of these policies when you come for future appointment(s). Our duties on these matters include maintaining the privacy of your protected health information, to provide you with this notice of your rights and our privacy practices with respect to your PHI, and to abide by the terms of this notice unless it is changed and you are so notified. If for some reason, you desire a copy of these internal policies for executing privacy practices, please let your therapist know and you will get a copy of these documents kept on file for auditing purposes.

Our Responsibilities

We are required to: maintain your privacy and provide you with and abide by the terms of this notice. We reserve the right to change our practices for all protected health information we maintain. Should our practices change, we will mail a revised notice to the address you've supplied us. We will not use or disclose your health information without your authorization, except as described in our notice.

Contact Information

For More Information or to Report a Problem

If you have questions or concerns about this Privacy Policy, would like additional information, or believe your privacy rights have been violated, you may contact the Executive Director by calling 620-227-1588 or sending a letter to: Catholic Charities of Southwest Kansas, Attn: Debbie Snapp, 906 Central Ave, Dodge City KS 67801.

Changes to the Privacy Policy

We reserve the right to change this Privacy Policy from time to time. When we do, we will note the last update at the bottom of this Privacy Policy. For changes to this policy that may be materially less restrictive on our use or disclosure of your personally identifiable information, we will obtain your consent before implementing the change by sending a notice to your primary email address and home address specified in our records and by placing a prominent notice on our website.

Revised Draft: October 25, 2017