PRIVACY POLICY

Last Updated: November 27, 2026

Welcome to Asia Lutheran Seminary. This Privacy Policy outlines how Asia Lutheran Seminary (unless otherwise indicated collectively "ALS," "we," "us," or "our") collects, uses, and protects your personal information when you visit the asiaseminary.com website (collectively, the "Site") or interact with ALS on the other platforms ALS uses as detailed below. ALS understands that you are aware of and care about your own personal privacy interests, and ALS takes that seriously. This Privacy Policy describes ALS's policies and practices regarding the collection and use of your personal data by ALS on our Site and the other platforms ALS uses as detailed below. By becoming a user of the Site or our Services through the Site or by otherwise submitting Personal Data to us on the Site, you give your consent to the collection and use of your personal data by ALS as explained in this policy.

ALS is committed to complying with the requirements of the Hong Kong's Personal Data (Privacy) Ordinance (PDPO).

Collection and Use of Personal Information

What Information We Collect

The information we collect varies depending on the type of activity you are performing on our Site or how you use our services. At times, we will collect personal information directly from you, and in other instances, our Site will collect other information automatically to deliver our services or as part of operating this Site.

We collect your personal information from various sources and in different ways, as detailed below:

- **Information You Provide Directly to Us:**
  - This includes personal data you voluntarily provide when you interact with us through our website forms (e.g., contact forms, inquiry forms), direct email communications, or phone calls.
  - The types of personal information we may collect in this manner include your name, address, email address, phone number, optional contact details for messaging services (such as WhatsApp, WeChat, LINE, or Facebook Messenger, if you choose to provide them), credit or debit card information (for donations or payments), and date of birth.
- **Information Collected via Third-Party Platforms:**

- **Online Forms and Applications:** When you submit applications, inquiries, or register for events through forms hosted by third-party services on our behalf (e.g., Google Forms for applications or surveys), the information you provide is collected by these services and made available to us.
- **Learning Management System (LMS) Data:** If you enroll as a student, we collect information necessary to create and manage your account on our Learning Management System (Moodle, accessible at als-online.org). This includes your username, password (stored securely in encrypted format), and your email address (used as a unique identifier). Additionally, within Moodle, we collect data related to your interactions with course materials, participation in forums, submissions of assignments, quizzes, and other learning activities (e.g., timestamps, completion status, grades, and communications within the platform).
- **Communication Management:** Your contact information, such as email addresses, may be collected through sign-up forms or provided directly to us, and is then managed and used through email communication and marketing platforms (e.g., Mailchimp), to which we transfer your data for the purpose of sending communications you have opted-in to receive.
- **Online Course Platforms:** If you access or enroll in courses offered through third-party platforms we utilize (e.g., Thinkific), the information you provide or generate through your use of those platforms, such as enrollment details, course progress, and communications, is collected by those platforms and made available to us.

- **Communication Content Data:**
  - If you choose to communicate with Asia Lutheran Seminary via email, telephone, our website contact forms, or instant messaging applications (such as WhatsApp, WeChat, LINE, or Facebook Messenger), we may collect information related to these communications. This includes your name, contact details, and the content of your messages, which helps us to respond to your inquiries and provide relevant information.
- **Employment Application Data:**
  - In addition, we may also collect information relating to your education and employment history when you submit that information as part of a job application. Not all requested information is required, however, and we specifically indicate what information is required in order to submit your job application.
- **Automatically Collected Information (Usage Data & Technical Data):**
  - Besides the information you choose to submit, our systems collect certain types of data automatically when you visit our Site. This information gives us insight into how our Site is being used, as well as helps us understand how we may improve it in the future and does not necessarily individually identify you. We may collect

information about your device, operating system, web browser, ISP, IP address, advertising identifiers, click activity, referring website, or region or general location where your computer or device is accessing the internet, to better serve you and to help us improve our Site and services. This typically entails automatically gathering data such as any of the content you view on our website.

- **How We Use Cookies and Other Tracking Technologies:**
  - Our website, including the main Site and the Moodle platform (als-online.org), utilizes "cookies" and other similar tracking technologies such as "web beacons" (also known as pixel tags).
    - Cookies are small data files that a website transfers to a user's device (e.g., computer, tablet, or mobile phone) for record-keeping purposes. They often include an anonymous unique identifier. Cookies can be either "session cookies" (which are temporary and deleted when you close your browser) or "persistent cookies" (which remain on your device for a specified period or until you delete them).
    - Web beacons are transparent pixel images or tiny graphics (often 1×1 pixel) embedded on a webpage or in an email. They are used in collecting information about website usage, email response, and tracking.
  - **Purpose of Use:** We use cookies and web beacons to:
    - **Provide Enhanced Functionality:** Such as remembering user preferences, enabling user ID and password prompts (e.g., for Moodle login), or facilitating secure processes like course registration. These are often "Strictly Necessary" or "Functional" cookies.
    - **Aggregate Traffic Data and Analytics:** To understand how visitors interact with our Site, which pages are most popular, how long users stay on pages, and navigation paths. This helps us analyze trends and improve our Site and services. This includes data collected via Google Analytics (GA4).
    - **Personalize User Experience:** To tailor content and provide you with a more personalized experience.
    - **Support Marketing and Communications:** To analyze the effectiveness of our marketing efforts and email campaigns (e.g., whether emails are opened or links are clicked, especially through MailChimp), or to provide targeted information or promotions where you have consented to receive them.
  - **First-Party and Third-Party Context:** These cookies and web beacons may be delivered in a "first-party context" (set directly by our website) or a "third-party context" (set by another organization's website, such as Google

Analytics, social media platforms, or embedded content providers). We do not have direct control over third-party cookies, and their use is governed by the respective third parties' privacy policies.

- **Your Choices Regarding Cookies:** You have many choices in regard to the management of cookies on your computer or device. All major web browsers allow you to block, delete, or manage cookie settings directly. To learn more about your ability to manage cookies and web beacons, please consult the privacy features or help sections in your specific browser. Please note that blocking or deleting certain cookies may impact the functionality and performance of our Site and services.
- **Our Website Platform:** Our website is built on the WordPress platform, which, along with its themes and plugins, may set certain cookies for essential site functionality and to support various features, as described above.

Site Statistics

We use Jetpack Stats and Google Analytics to understand how people use this website, for example which pages are visited and roughly which country visitors come from. These tools use cookies and similar technology. They don't tell us who you are, and we don't use them for advertising. You can stop Google Analytics from recording your visits with Google's opt-out browser add-on (tools.google.com/dlpage/gaoptout).

How We Use Your Information

ALS uses the information we collect on this Site to provide you with services requested or as required for studying at ALS, customize your online experience, and to improve the Site, our organization, and our products and services. More specifically, we use your information to:

- Deliver our services as requested
- Provide informational, educational, or devotional content, including newsletters
- Register you for and provide information about events or training; provide certification and training and event-related information
- Consider you for employment
- Communicate with you about our Site, services, or events
- Provide you with information about benefits, events, goods, or services that may interest you
- Present you with marketing relating to our Services and more relevant display advertisements, and to share promotional events

- Conduct research and analysis to improve our Site and services
- Manage our services offerings, and assess the effectiveness of our marketing efforts
- Analyze and improve the content and functionality of our Site and services
- Improve our products, services, or organization
- Prevent, detect, or investigate security concerns, including fraud
- Comply with applicable laws, regulations, or industry requirements
- Fulfill any other purpose for which you provide it or consent

If at any time you wish not to receive any future marketing communications, or you wish to have your name deleted from our mailing lists, please contact us as indicated below. Note, however, that as a user of services, we will send you administrative communications that are reasonably necessary to the service, such as billing or service notifications.

How We Share and Disclose Your Information

We may share your information for our business purposes, examples of which are below.

- **With Service Providers (Data Processors):** We engage various categories of third-party service providers to assist us in operating our seminary and delivering our services. These 'data processors' act on our behalf and are contractually obligated to protect your personal data and to only use it for the specific purposes for which we disclose it to them. Examples of categories of service providers we may share data with include:
  - Website hosting and infrastructure providers (including those hosting and maintaining our Moodle LMS at als-online.org)
  - Email communication and marketing platforms (e.g., Mailchimp, for managing and sending our communications)
  - Learning Management System (LMS) providers (e.g., Thinkific and Moodle, for course management and student records)
  - Website analytics services (e.g., through WordPress plugins and Google Analytics, for understanding site usage)
  - Payment processing providers (e.g., Stripe)
  - Data storage and backup providers
  - Customer relationship management (CRM) systems
  - Online communication tools.

- We may share information to prevent, detect, or investigate security concerns, including fraud.
- We may share information to comply with applicable laws, regulations, or industry requirements.
- We may share your information with law enforcement if required by law or in order to prevent fraud or other potential wrongdoing.
- We may share your personal information with our affiliates so that they may provide you information about products and services you have opted into to receive such communications that may interest you to the extent allowed by applicable law.
- We may disclose or share your personal information in connection with an employment application to verify the information you provide.
- We do not share your personal information with other non-affiliated third-party companies for those companies to market their services or products to you.

Your Data Protection Rights

We are committed to providing you with control over your personal data. Depending on your location and applicable data protection laws, you may have the following rights regarding the personal data we hold about you:

- **Right to Access (Data Access Request):** You have the right to request a copy of the personal data we hold about you. This includes information about how and why we process your data, categories of data involved, and recipients to whom your data has been disclosed.
- **Right to Rectification/Correction:** You have the right to request that we correct any inaccurate or incomplete personal data we hold about you. This includes updating your contact information or academic records.
- **Right to Erasure ("Right to be Forgotten"):** You have the right to request the deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected, or if you withdraw your consent and there is no other legal basis for processing. Please note that this right is not absolute; we may be required to retain certain information to comply with legal obligations (e.g., tax, academic accreditation requirements), resolve disputes, or for the establishment, exercise, or defense of legal claims.
- **Right to Restriction of Processing:** You have the right to request that we restrict the processing of your personal data under certain conditions, for example, if you contest the accuracy of the data, or if you object to its processing and we are assessing our legitimate grounds.

- **Right to Data Portability:** Where applicable, you have the right to receive the personal data you have provided to us, in a structured, commonly used, and machine-readable format, and to transmit that data to another organization. This right applies to data processed by automated means based on your consent or for the performance of a contract.
- **Right to Object to Processing:** You have the right to object to the processing of your personal data based on our legitimate interests or for direct marketing purposes. If you object to direct marketing, we will cease processing your data for that purpose.
- **Right to Withdraw Consent:** Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Exercising Your Rights

To exercise any of these rights, please submit your request in writing by emailing us at support@asiaseminary.com.

- **Identity Verification:** To protect your privacy and security, we may need to verify your identity before fulfilling your request. We may ask for additional information to confirm your identity or to locate the specific data you are requesting.
- **Response Time:** We will endeavor to respond to your legitimate requests within 30 days. If your request is complex or we are handling a large volume of requests, it may take longer, but we will inform you of the extension within the initial 30-day period.

Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Our data retention periods are determined based on the type of data, the purpose for which it was collected, and applicable legal or regulatory obligations.

When your personal data is no longer required for these purposes, we will securely delete or anonymize it in accordance with our internal data retention policy.

Leaving Our Site and/or Linking to Third Parties

Our Site may contain links to websites, services, and applications that are not operated or controlled by Asia Lutheran Seminary (ALS). These "third-party sites" include, but are not limited to, social media platforms (such as Facebook, LinkedIn, Twitter, Instagram, etc.), payment processors, and other external resources.

- **No Responsibility for Third-Party Sites:** When you click on a link that takes you to a third-party site, you will be leaving the ALS website. Please be aware that once you leave our Site, this Privacy Policy no longer applies. We are not responsible for the content, privacy practices, security, or availability of any third-party sites. We do not endorse or make any representations about these third-party sites, and your access and use of them are at your own risk.
- **Differing Policies:** The privacy and security policies of linked third-party sites may differ significantly from those practiced by ALS. We strongly encourage you to review the privacy policy and terms of service of any third-party site you visit before providing any personal information or engaging in any transactions.
- **Social Media Interactions:** Our Site may provide links to our official social media pages or integrate social media "like" or "share" buttons. If you choose to interact with these features or "like" or share information from our Site through these services, your interaction is governed by the privacy policy of that social media platform. If you are a member of a social media site, these interfaces may allow the social media site to connect your site visit to your personal data held by them. As with any other third-party site, these social media sites linked on our Site are not subject to our Privacy Policy.

Children's Privacy

Asia Lutheran Seminary's (ALS) websites and online services, including our Moodle platform (als-online.org), are not directed at children under the age of 13. We do not knowingly solicit or collect personal information from individuals under 13 years old without verifiable parental consent. Our services are intended for adult learners and individuals who meet our admission criteria.

- **If We Learn of Collection from a Child Under 13:** If we become aware that we have unknowingly collected personal information from a child under 13 years of age without verifiable parental consent, we will take reasonable steps to promptly delete such information from our records. If you are a parent or guardian and believe that your child under 13 has provided us with personal information, please contact us immediately using the contact details provided in this Privacy Policy.
- **For Individuals Under the Age of Majority (e.g., under 18 in Hong Kong or below GDPR consent age):** For individuals who are minors (e.g., under 18 in Hong Kong) but above the age of 13, we encourage parents or guardians to supervise their children's online activities and to consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. If personal data is provided by a minor, we rely on the understanding that appropriate consent or authorization from a parent or guardian has been

obtained where required by applicable law (such as for certain data processing activities under the GDPR, where the age of digital consent may vary by region, or as recommended by the Hong Kong PCPD for minors).

For Users in the European Economic Area (EEA), United Kingdom (UK), and Switzerland

General Data Protection Regulation (GDPR) and UK GDPR Information

For individuals accessing our Site or services from within the European Economic Area (EEA), United Kingdom (UK), and Switzerland, we process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the UK General Data Protection Regulation (UK GDPR), as applicable.

Asia Lutheran Seminary (ALS) as Data Controller

When you provide us with your information through our Site, including asiaseminary.com and als-online.org, or when you use our services, Asia Lutheran Seminary serves as a Data Controller. This means that ALS determines the purposes and means of the processing of your personal data, in accordance with this Privacy Policy.

ALS is headquartered in Hong Kong. We have designated a privacy contact person for you to reach out to with any questions or concerns about ALS's personal data policies or practices under GDPR/UK GDPR:

Jeremy Seeger
ALS Chief Technology Officer
688 Shanghai St., Mong Kok
support@asiaseminary.com
+852 3118 6445

Our Legal Basis for Processing Your Personal Data

We will only process your personal data where we have a lawful basis to do so. Our legal bases for processing your personal data for the purposes outlined in this Privacy Policy typically include:

- **Performance of a Contract:** To fulfill our contractual obligations with you or to take steps at your request before entering into a contract (e.g., to process your application, manage your enrollment, provide access to courses on Moodle).
- **Legitimate Interests:** Where the processing is necessary for our legitimate interests and these interests do not override your fundamental rights and freedoms (e.g., to operate and improve our services and Site, to develop and enhance our educational

offerings, to prevent fraud, to ensure the security of our systems, for internal administrative purposes, or to comply with law enforcement requests where appropriate and necessary).

- **Consent:** Where you have given us explicit consent for specific processing activities (e.g., for sending marketing communications you have opted into, or for certain non-essential cookies, where applicable). You have the right to withdraw your consent at any time for processing based on consent.
- **Legal Obligation:** Where processing is necessary for compliance with a legal obligation to which ALS is subject (e.g., tax, reporting, or regulatory requirements).
- **Public Interest:** In certain specific circumstances, processing may be necessary for the performance of a task carried out in the public interest.

Your Data Protection Rights (GDPR/UK GDPR Specifics)

As a data subject under the GDPR/UK GDPR, you have the following enhanced rights concerning your personal data:

- **Right to Information/Transparency:** The right to be informed about the collection and use of your personal data, which this Privacy Policy aims to achieve.
- **Right to Access:** The right to obtain confirmation that your data is being processed and to access your personal data and certain supplementary information (as detailed in the "Your Data Protection Rights" section of this Policy).
- **Right to Rectification:** The right to have inaccurate personal data corrected, and incomplete personal data completed (as detailed in the "Your Data Protection Rights" section of this Policy).
- **Right to Erasure ("Right to be Forgotten"):** The right to request the deletion of your personal data under specific conditions (as detailed in the "Your Data Protection Rights" section of this Policy, including the legitimate exceptions).
- **Right to Restriction of Processing:** The right to request that we restrict the processing of your personal information in certain situations (e.g., if you contest the accuracy of your data, or if you object to its processing and we are assessing legitimate grounds).
- **Right to Data Portability:** The right to receive the personal data you have provided to us, which is processed by automated means based on consent or for the performance of a contract, in a structured, commonly used, and machine-readable format, and to transmit that data to another controller.
- **Right to Object to Processing:** The right to object to the processing of your personal data in certain circumstances, particularly processing based on legitimate interests or for direct marketing.

- **Right to Withdraw Consent:** Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Complain to a Supervisory Authority:** If you are located in the EEA or UK and believe that our processing of your personal data infringes applicable data protection laws, you have the right to lodge a complaint with a supervisory authority in the Member State of your habitual residence, place of work, or place of the alleged infringement.

How to Exercise Your Rights

To exercise any of these rights, please follow the instructions provided in the "Your Data Protection Rights" section of this Privacy Policy, by contacting us at support@asiaseminary.com.

International Transfer of Information Collected

Asia Lutheran Seminary is based in Hong Kong. If you are located in the EEA, UK, or Switzerland, please be aware that any information we collect from you, including personal data, will be transferred to, stored, and processed in Hong Kong. The European Commission has not issued an "adequacy decision" for Hong Kong under Article 45 of the GDPR, meaning Hong Kong is not considered by the EU to provide an equivalent level of data protection to that in the EEA/UK.

By using our Site and services, you acknowledge and, where necessary, consent to the transfer of your personal data to Hong Kong under these safeguards.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. The "Last Updated" date at the top of this policy will indicate when the most recent revisions were made.

- **Non-Material Changes:** For minor changes (e.g., typos, clarifying language, minor procedural updates that do not materially affect your rights or the processing of your personal data), we will update the "Last Updated" date and publish the revised policy on our Site. We encourage you to periodically review this page for the latest information on our privacy practices.
- **Material Changes:** For significant or "material" changes that affect how we collect, use, store, or share your personal data, or that substantially impact your rights, we will provide more prominent notice. This may include:

- Sending an email notification to registered users (where we have your email address).
- Displaying a prominent banner or pop-up notice on our website homepage.
- Any other method required by applicable law. We will give you a reasonable period to review these material changes before they become effective. Your continued use of our Site and services after the effective date of such changes will constitute your acceptance of the updated Privacy Policy. If you do not agree with the changes, you should cease using our Site and services and contact us to discuss your options regarding your personal data.

Contact Us

We welcome your questions, comments, and concerns regarding this Privacy Policy or our privacy practices. If you have any inquiries, or if you wish to exercise any of your data protection rights, please do not hesitate to contact us through the following channels:

- Email: support@asiaseminary.com
- Mail: 8/F Chun Hoi Commercial Bldg., 688 Shanghai Street, Mong Kok, Kowloon, Hong Kong
- Telephone: +852 3118 6445

Please allow us reasonable time to respond to your inquiries. For data access, correction, or deletion requests, please refer to the "Your Data Protection Rights" section for more details on the process and our response times.