



# Privacy Notice Policy

Approved by the Board of Directors September 2021

## Introduction

Your privacy is a priority for United Way of Southwest Wyoming (UWSW, “us,” or “we”) and we want you to be familiar with how we collect, use, and disclose (“Process”) information relating to you that enables your identification (the “Personal Information”). This Privacy Notice describes our practices with information that we (or our service providers) acquire about you through our website at (swunitedway.org]) (the “Site”) or that you provide directly to us.

## 1. Collection of Personal Information

As you interact with UWSW or use the Site, we may collect information from you as described below.

### a. Information you provide

In some instances, you may provide information directly to us by filling out a form or as part of a phone call or conversation with a representative of UWSW. For example, if you complete a registration as a donor, you may provide us with your name, contact information, and payment information.

In addition, some elements of the Site may ask you to submit Personal Information in order for you to benefit from the specified features or participate in a certain activity, such as a donation or an application for employment. For example, if you register for a user profile on the Site, we may request Personal Information such as your name and contact information. If you register a resume with UWSW through the site, we may request your Personal Information such as your name, contact information, and relevant professional information. We may combine information you submit through the Site with other information we have collected from you, whether on-line or off-line. We treat the combined information in accordance with this Privacy Notice.

### b. Sensitive Information

Unless we specifically request or invite it, we ask that you not send or otherwise disclose to us your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership. Where you provide us with such information without request from UWSW, we reserve the right (but do not have any obligation) to erase any such information at our discretion.



### **c. Information About Minors**

The Site is not intended to acquire information concerning persons under the age of 16 and we do not knowingly collect Personal Information online or through other means from persons in this age group. We reserve the right to delete any information identified as having been provided by such persons at our discretion.

### **d. Passive Information Collection, Use, and Choices**

As you navigate the Site, certain Personal Information may be passively collected, meaning it is gathered without your actively providing it. This is done using the following techniques in the following ways:

- *IP Addresses:* An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit the Site, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and understand from what geographic regions our website visitors come. We also may use this information to enhance the Site.
- *Through your browser:* Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version.
- *Cookies:* The Site may use “cookies” to help make sure the Site is meeting the needs of its users and to help us make improvements. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies set by us on the Site to tell us, for example, whether you have visited us before or if you are a new visitor. We use third-party cookies set by our service provider, Google Analytics, to collect information about how visitors use the Site, including how long you spend on each page, and how you got to the Site. We do not use data collected by cookies to identify who you are.

You can refuse our use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies you may not be able to access all or parts of the Site or functionality may be limited. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies.

Changing your internet browser settings can prevent the use of cookies. Each browser has a different procedure for disabling the use of cookies. The Help function within your browser should tell you how.

You can visit <https://tools.google.com/dlpage/gaoptout> for information on how to opt out of Google Analytics cookies.



- *Web Beacons/Clear Gifs:* We may employ, and our third party advertising partners may employ, a software technology called web beacons, also referred to as clear gifs or web bugs, that help manage content on the Website by tracking the content that engages users. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We may also use clear gifs in our HTML-based emails to let us know which emails recipients have opened. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

## **2. How We Use the Information We Collect**

We use Personal Information for the purposes described in this Privacy Notice and as otherwise described to you at the point of collection.

Specifically, we may use Personal Information from or about you:

- i. to respond to your inquiries and fulfill your requests;
- ii. to process donations and transactions;
- iii. to transmit applications for employment;
- iv. to send you important information regarding our relationship with you or regarding the Site, changes to our terms, conditions, and policies, and other administrative information;
- v. if you choose to complete a survey, we may use the information for purposes of evaluating your feedback from the survey;
- vi. for our administrative and development purposes, such as data analysis, audits, recordkeeping, developing new products or services, enhancing the Site, improving our services, identifying Site usage trends, optimizing your experience on the Site
- vii. to ensure compliance with our legal obligations, as described in Section 4 below; and
- viii. if we intend to collect and use Personal Information for another purpose, we may seek your permission at the time the information is collected.

## **3. Our Disclosure of Your Information**



UWSW does not sell your Personal Information. We may share your Personal Information with third parties only as described in this Privacy Notice or as otherwise described at the point where we collect the information from you, including:

- i. to United Way Worldwide, in furtherance of the interests set forth in this Privacy Notice;
- ii. to the companies or individuals that we hire to provide services to us, such as background check services or website hosting services; data and donation processing; and
- iii. to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

#### **4. Uses and Disclosures to Comply with Laws**

We may use and disclose Personal Information we collect as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

#### **5. Where Your Information is Processed**

UWSW is based in the United States. No matter where you are located, your Personal Information will be collected and processed in the United States. The laws of the United States and other countries governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

#### **6. Security**

UWSW will take reasonable steps to protect the information it collects from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. UWSW also uses reasonable efforts to ensure that its website is generally available to access information concerning its privacy practices. However, there will be occasions when access to the Site will be interrupted or unavailable. UWSW will use reasonable efforts to minimize such disruption where it is within its reasonable control. You agree that UWSW shall not be liable to you for any modification, suspension or discontinuance of the Site.



## **7. Data Retention**

We generally retain Personal Information for so long as it may be relevant for the purposes identified in this Privacy Notice, unless a longer period of time is required by law.

## **8. Right to Change Privacy Notice**

UWSW reserves the right at any time to modify, alter, or update this Privacy Notice. Please review this policy periodically, and especially before you provide any Personal Information to us.

## **9. Contacting Us**

Please feel free to contact us if you have any questions about this Privacy Notice or our information practices.