

Example OF A MODEL NGO PRIVACY POLICY

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Data & Society Research institute

<https://datasociety.net/about/>

PRIVACY POLICY

As an organization focused on social and cultural issues arising from data-centric technological development, the Data & Society Research Institute (“Data & Society” or “we” or “us” or “our”) shares your concerns about privacy and appreciates your interest in knowing how your information is gathered, used and safeguarded. We want to be transparent and open about these issues, so we have created this Privacy Policy (the “Privacy Policy”) to provide you with additional information on these topics. This Privacy Policy describes the practices, policies and procedures of our Website located at www.datasociety.net (the “Website”), including the types of personal information we collect on the Website, how we may use that information and with whom we may share it. Please note that this Privacy Policy applies only to the information that we gather online via our Website, and does not apply to information that we might gather offline, which will be governed by different policies.

PLEASE NOTE: When visiting and interacting with this Website, the information we collect or that you share with us will be governed by the practices, policies and procedures described below. If you have questions or concerns about any of our practices or policies, we encourage you to reach out to us to discuss. However, we want you to realize that any interactions that you may have with the Website will be governed by the then current terms, so if you have any reservations or concerns, you may want to consider utilizing certain browser/cookie settings that will support more private browsing options. As we are committed to providing you with accurate and up-to-date information as to our online data-gathering practices, we will endeavor to update this Privacy Policy from time to time in order to inform you about new or changed practices, policies, and procedures, so please check this Privacy Policy periodically for changes. The date this Privacy Policy was last updated is stated at the end of this document. If you have any questions about this Privacy Policy, please do not hesitate to contact us at the address below.

SUMMARY

The information provided by this Privacy Policy includes:

- What personally identifiable information we collect from you through the Website.
- How we use the information we collect.
- With whom the information may be shared.
- What choices are available to you regarding collection, use and distribution of your information.
- The kind of procedures we employ in an effort to prevent the unauthorized access, use or disclosure of information you provide to us.
- Information related to how third-party websites may be linked to our Website.

- How you can make changes to the information we collect about you.
- The laws that apply to those accessing our Website from outside of the United States.
- How you can learn about changes to our privacy policies, practices and procedures.
- How you can make changes to the information we collect on you
- Other rights that you may have

HOW TO CONTACT US

The Data & Society Research Institute (the Data Controller) is the owner and operator of the Website. If you need to contact us for any reason related to this Privacy Policy or your use of the Website, or you would like to request that you be removed from our database, please email us at info@datasociety.net, or contact us at the address listed below.

PURPOSE FOR INFORMATION COLLECTION

As noted below, you may visit our Website without being required to provide us with any personally identifying information. However, should you decide to provide such information, the information we collect will be used to meet the original reason that you provided us such information, or to provide you with the applicable service requested, and as further described below.

THE INFORMATION WE COLLECT

Personal Information You Provide And How It Is Used: You may freely visit our Website without being required to provide us with any personal information. However, certain services, requests and features do require that you provide us with some personally identifying information (including, but not limited to, name, address, email) as more particularly described below; availing yourself of any of these services, requests and features is voluntary. Personal information is data that can be used to identify or contact you. We do not knowingly collect sensitive personal information, such as information about medical or health conditions. Please do not send confidential information to us directly through this Website, or by email to any of the contact email addresses listed on this Website. We currently collect personal information via:

Email Newsletters: If you opt to signup for our email newsletter, we will ask you to provide us your email address; you will also have the option of providing us with your name. You may unsubscribe from these emails and in many cases modify your “email preferences” previously selected at any time by using the link provided in the footer of all such emails.

Get In Touch: If you chose to contact us through any of the contact form options on the Website, we will ask that you provide an email address; in your email you will have the option to provide additional personally identifying information. We will use the information you provide to contact you back and to respond to any requests.

Fellowship Applications: Those opting to apply to our fellowship program will be asked to submit an application. You will be asked to provide a variety of information about yourself, including your name and contact information, past work and references. We will use the information you provide us to evaluate your candidacy for the Data & Society Fellowship Program.

Event Registrations: If you choose to signup for one of our events, you will be required to register. In order to register you will need to provide us with your first and last name and email address. Additional information may also be requested, depending upon the specific event.

Donate: If you make a donation through the Website via the “donate” button, you will be asked to provide certain personally identifying information, such as your name and home address, as well as your credit card billing information, in order to process the donation. The credit card information that you provide at the time of donation is used only to process your donation and will not be stored or used for any other purpose. However, if you opt to make a recurring donation, your credit card information will be stored and used for the purpose of processing your recurring donation.

Non-Personal Information We Collect by Automated Means And How We Use It: We also collect certain non-personal information (data in a form that does not support direct association with any specific person or individual) by automated means when you visit the Website. Much of this information is collected through the use of third-party tracking services, which includes Google Analytics. The information collected may include usage information, such as the numbers and frequency of users to the Website, pages visited, web browsing histories, online purchases and searches, social networking activities and similar data. We also collect via our email marketing service provider – MailChimp – non-personal information related to the emails we send out, including the number of times a email may be opened and the number of times that a link is “clicked” – both of these activities may be linked to your specific email address. When gathered, this data, if used, is used in the aggregate, and not in a manner that is intended to identify you personally. This type of aggregate information may be shared with third parties at any time. In addition to the third-party tracking services mentioned above, we also collect this information through various other means, including “cookies,” “web beacons” and IP addresses, as further explained below.

Cookies - We receive and store certain types of information whenever you interact with us. A cookie is a piece of information that a web server may place on your computer when you visit a website. Cookies are used for a variety of reasons, including to improve a user’s website experience. Many cookies last only through a single website session, or visit. Others may have an expiration date, or may remain on your computer until you delete them. There are a variety of types of cookies. Data & Society uses “performance cookies” in order to enhance the user experience and for other website related purposes. These cookies collect information about how our Website is used, including which pages are most viewed, how long someone stays on a webpage, and whether any error messages were received. “Functionality cookies” may also be utilized; these cookies allow the Website to remember information you have provided in order to provide a more customized experience. Neither session cookies nor functionality cookies are linked to personally identifiable information. We may also use “required cookies,” which provides us the ability to store a user name or related login credentials so that you do not have to provide this information every time you return to our Website. Please note that these required cookies will be associated with the personal information that you provide. Although you are always free to opt out from providing such information to us, the result is that you may not be able to avail yourself of some features of our Website. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. However, as mentioned elsewhere, without cookies you may not be able to take full advantage of all the features, functionality and resources available on our Website. Please note, that in some cases, Data & Society may also use another company to operate web servers for our Website. Data & Society uses the cookie information gathered by these companies in the same manner as stated in this Privacy Policy.

Web Beacons - Certain pages on the Website contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). These web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page

containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party. Web beacons also may be used to track whether you have opened an HTML email. When the email is opened, a part of the code that makes up the HTML page calls a web server to load the web beacon that then generates a record showing that the email has been viewed. Web beacons may also recognize when the email was opened, how many times it was forwarded and which URLs (links within the email) were clicked. We use Web Beacons to better understand your preference and to tell us which part of the Website you have visited and to save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors.

IP Addresses - When you visit and interact with the Website, Data & Society and third parties with whom we have contracted to provide services for us may collect Internet Protocol addresses (each an "IP Address"), as well as browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and page navigation. An IP Address is a unique identifier number that certain electronic devices use to identify and to communicate with each other on the Internet; your Internet Service Provider automatically assigns an IP Address to the computer that you are using. We gather this information to track website visitor movement in the aggregate, and to gather broad demographic information for aggregate use. Our goal in gathering this information is to learn how our customers and the public are using our service. We may use this information to enhance our Website or for other lawful purposes.

Do Not Track - Every time your computer sends or receives information over the Web, the request begins with some short pieces of information called "headers." These headers include information like what browser you are using, what language your computer is set to, and other details. The Do Not Track technology provides individual users with the ability to include a simple, machine-readable header indicating that they don't want to be tracked, and sends a signal to Web sites' visited requesting that the website disable either its tracking or cross-site user tracking of an individual user. Currently, various browsers – including Internet Explorer, Google Chrome, Firefox, Opera and Safari – offer a "do not track" option. Presently, there is no consensus on how Do Not Track should be interpreted, and no common or accepted industry standard for implementing. Consequently, please note that Data & Society's Website does not currently respond to browsers' Do Not Track signals, and as such your activities will be tracked, regardless of whether you have opted to enable the Do Not Track option offered by your browser.

HOW WE MAY SHARE YOUR INFORMATION

We will only disclose information (described herein) that we collect from you in accordance with the terms of this Privacy Policy. Please be aware that Data & Society works with a variety of third-party partners in order to allow us to make the Website available to you, to host and store the information we collect from you, and to provide certain functionality and features. These partners include Mediatemple.net, our web server/hosting partner, MailChimp, our email marketing service provider, and Eventbrite, providing functionality and support in regard to Data & Society event registration; each of these partners may receive or have access to some of the information you provide to us online. Otherwise, we do not reveal personally identifiable information about you to third parties for their independent use unless: (1) you expressly authorize Data & Society to do so, (2) it is necessary to allow Data & Society and its service providers or agents to provide services on Data & Society's behalf, (3) it is necessary in connection with a sale of all or substantially all of the assets of Data & Society or the merger of Data & Society into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which Data & Society is not the

survivor, (4) otherwise as Data & Society is required or permitted to do so for any or all of the following reasons: (i) to comply with a subpoena, legal process, government request or any other legal obligation, but please note that we will use our best efforts to protect your information against any such requests, (ii) to prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of the Website or our network, and/or (iii) to protect the rights, privacy, property, business, or safety of Data & Society, their partners and employees, the visitors of the Website, or the public.

CHILDREN'S PRIVACY

We do not knowingly collect, use, or disclose personally identifiable information about visitors less than 16 years of age. If you are under the age of 13, you must ask your parent or guardian to assist you while accessing/viewing this Website. If you are the parent or guardian of a child under 13 years of age and believe that they have disclosed personally identifiable information to us, please contact us at info@datasociety.net so that we can delete your child's information.

THIRD PARTY WEBSITE

We may provide links to third-party websites, including social media sites – such as Facebook, Twitter - as a service to you or in order to provide you additional information related Data & Society or additional venues in which you can learn about and discuss the activities of Data & Society. Please note that we have no affiliation with these other parties, and cannot control and are not responsible for the information collection, use, and disclosure practices of such third parties; we encourage you to review and understand their privacy practices and policies, if any, before using providing any personally identifying information to them. We are not responsible for the content or information of these websites, an products or services that may be offered through advertisers or third parties, or any other use of the linked website.

HOW WE ATTEMPT TO SAFEGUARD YOUR INFORMATION

We maintain – and ask that any third-party partners who may store information on our behalf to maintain - administrative, technical and physical safeguards for the Website designed to protect your personal information against theft, loss, misuse or unauthorized access, disclosure, alteration or destruction of the personal information that we collect from you. We restrict access to personal information collected about you on the Website to our employees, our affiliates' employees, those who are otherwise specified in this Privacy Policy, or others who need to know that information to provide services to you or in the course of conducting our business operations or activities. Please note, however, that while protecting your privacy is an important priority for Data & Society, no website, application or transmission can guarantee security. Thus, while we have established and maintain what we believe to be reasonable procedures to protect the confidentiality, security, and integrity of personally identifying information obtained through the Website and we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or that we – or one of our vendors - may hold on your behalf. Additionally, when you link to one of our social media venues, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to submit in these instances. For example, if you list your name and email address in a Facebook posting, that information is public. Please take care when using these features or visiting these other sites. Therefore, you hereby understand, acknowledge, and agree that you transmit certain personal information over this Website at your own risk.

YOUR INFORMATION AND YOUR CHOICES

As much as reasonably possible – or as required by applicable law or regulation - we will endeavor to provide you provide you with (i) reasonable access to the personally identifiable

information you provide to us, and (ii) the ability to review, correct and delete such personally identifiable information. If you believe that any of the personally identifiable information that you have submitted through our Website is no longer accurate, or you wish to make any updates, changes or simply want more information about the personal information that we are holding, please feel free to contact us at info@datasociety.net. You can also make certain changes by logging into the account via the link provided in emails that we send to you. We will do our best to meet your requests to update or amend your information as soon as reasonably practicable. We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are impractical, or for which access is otherwise prohibited required by local law. Please note we may need to retain certain information for record keeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed from such locations. Finally, we are not responsible for removing or deleting information from the databases of third parties (such as service providers) with whom we have shared information about you.

DATA RETENTION

We will retain your information for as long as needed to continue to fulfill our obligations to you in relation to your original request(s) or reason(s) for providing your personal information to us, or otherwise as is reasonable and customary given the nature of the relationship you have with Data & Society. Please note we may need to retain certain information for record keeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed from such locations. Otherwise, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

USE OF THE WEBSITE FROM OUTSIDE THE UNITED STATES

We do not represent or warrant that the Website, or any part thereof, are appropriate or available for use in any particular geographic location. If you choose to access our Website, you do so on your own initiative and at your own risk, and are responsible for complying with all local laws, rules, and regulations applicable in your jurisdiction. Please note that the Website is hosted in the United States and is governed by United States law. If you are visiting the Website from outside the United States, please be aware that your information will be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the Website, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Policy.

THE RIGHT TO LODGE A COMPLAINT

Please note that if you are a European Union resident, you have the right to lodge a complaint about our processing of your information/data with your local supervisory authority.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to revise this Privacy Policy at any time, especially in order to ensure that this Privacy Policy remains current and adequately and accurately reflects our backend data-gathering practices. Please check back regularly to see if there have been any changes to this policy, which you can determine by reviewing the Effective Date listed below. By continuing to use the Website after those changes become effective, you consent and agree to be bound by the revised Privacy Policy.

PRIVACY QUESTIONS AND CONTACTING US

If there are any questions regarding this Privacy Policy you may contact us using the information below.

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PRIVACY POLICY EFFECTIVE DATE

This Privacy Policy is effective as of May 25, 2018.