

Economic Mobility Pathways

<https://www.empathways.org/>

Privacy Policy

Last Updated: [November 29th, 2021]

This Privacy Policy describes the privacy practices of Economic Mobility Pathways and its affiliates (collectively, “EMPath”, “we”, “us”, or “our”) and how we handle personal information that we collect through our website, learning management system, membership portal, any other online resources that link to this privacy policy, or your interactions with us (collectively, “the Service”).

Personal Information We Collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact details**, such as your first and last name, email address, zip code, school and education information, job title, organization, social media information, and any other information you provide when you register for a class, log into the portal, or otherwise interact with the Service.
- **Communications** that we exchange with you, including when you contact us with questions, feedback, or otherwise, and communications that you exchange with other users on the membership portal.
- **Payment and transactional data** needed to complete your payments on or through the Service (including name, payment card information, bank account number, billing information), and your payment history. We use third-party vendors including Blackbaud, NeonPay, PayPal, and Stripe to process these payments.
- **Marketing data**, such as your preferences for receiving our marketing communications, and details about your engagement with them.

Third party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Data providers**, such as information services and data licensors.
- **Public sources**, such as social media platforms.

- **Partners**, such as other nonprofits, public agencies, and other organizations we partner with.

Automatic data collection. We, our service providers, and our partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, device type, mobile device carrier, and IP address.
- **Location information**, such as city, state, or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How We Use Your Personal Information

We use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery. We use your personal information to:

- provide, operate and improve the Service and our organization;
- process your donations and complete transactions with you;

- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our organization. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful purposes, including to analyze and improve the Service and promote our organization.

Marketing and advertising. We, our service providers, and our partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you EMPATH-related direct marketing communications as permitted by law, including, but not limited to, notifying you of special events via postal mail, email, telephone, text message, and other means. You may opt out of our marketing communications as described in the “[Online tracking opt out](#)” section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How We Share Your Personal Information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

Service providers. Companies and individuals that provide services on our behalf or help us operate the Service or our organization (such as hosting, information technology, payment processing, customer support, email delivery, and website analytics services).

Partners. Other nonprofits, public agencies, and organizations we partner with, for joint marketing efforts or for our partners' own marketing purposes.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Please keep in mind that whenever you voluntarily make your personal information available for viewing by third parties or the public on or through our Service, that information can be seen, collected and used by others. We are not responsible for any use of such information by others.

Your Choices

Access to information. To keep your information accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct information in our possession that you have previously submitted via the Service. Please also feel free to contact us if you have any questions about our Privacy Policy or the information practices of the Service at nluzuriaga@empathways.org.

Cookies. Most browser settings let you delete and reject cookies placed by websites. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, you may not be able to use all functionality of the Service and it may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. For further information about cookies, and to opt out of cookies, please refer to our [Cookie Policy](#).

We use Google Analytics to help us understand user activity on the Service. You can learn more about Google Analytics cookies at <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies> and about how Google protects your data at <http://www.google.com/analytics/learn/privacy.html>. You can prevent the use of Google Analytics relating to your use of our sites by downloading and installing a browser plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

Opt out of marketing communications. You may opt out of marketing-related communications by following the opt out or unsubscribe instructions contained in the marketing communication we send you.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other Sites and Services

The Service may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

International Data Transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may therefore be processed in the United States or transferred to other locations where privacy laws may not be as protective as those in your state, province, or country.

Additional Information for Users Located in Europe

Personal Information. References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation.

Controller and EU Representative. EMPath is generally the controller of your personal information for purposes of European data protection legislation. Our EU representative is [Stichting Mobility Mentoring@ Netwerk Nederland], located at [Reykjavikstraat 1, 3543 KH Utrecht]. You may contact them at [0635115814].

Legal Basis for Processing. We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at nluzuriaga@empathways.org.

Processing purpose	Legal basis
To provide the Service	Processing is necessary to perform the contract governing our provision of the Service or to take steps that you request prior to signing up for the Service.
To communicate with you To create anonymous data for analytics For compliance, fraud prevention and safety To share your personal information (except where necessary to comply with law)	These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
To comply with law (including disclosure to third parties where legally required)	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated at the time we request your consent or by contacting us at nluzuriaga@empathways.org .

Retention. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

EMPath retains information associated with an account for as long the account is active, or as long as the information is required to (a) provide you with the Service; (b) comply with our legal obligations; (c) resolve disputes; or (d) enforce our agreements. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

Data Subject Rights. European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You can submit these requests by email to nluzuriaga@empathways.org or our postal address provided below. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described above or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer. If we transfer your personal information from Europe to another country such that we are required under to apply appropriate safeguards to your personal information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.

Children

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information through the Service from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

How to Contact Us

You can reach us by email at nluzuriaga@empathways.org or at the following mailing address:

Economic Mobility Pathways
c/o Nicki Ruiz De Luzuriaga
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