

## **PRIVACY POLICY**

Last Updated August 6, 2020

### **INTRODUCTION**

Thank you for choosing to be part of our community at Education Leaders of Color (“EdLoC”, “Company”, “we”, “us” or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions about this Privacy Policy, or our practices regarding your personal information, please [Contact Us](#).

This Privacy Policy applies to all of EdLoC’s information-gathering activities conducted online (including via the EdLoC website, the EdLoC intranet, Wiki or other knowledge management tool, the EdLoC community platform, and any mobile applications EdLoC may make available), or offline (via traditional, hard copy forms) (collectively, the “Channels”), and applies to all visitors, users and others who access our Channels (“User(s)”, “you” or “your”).

EdLoC is a national membership-based nonprofit organization dedicated to increasing the number of Black and Latino leaders in high-level positions within education and related sectors. By advancing leaders, aligning them with EdLoC’s Third Way Values, and directly investing in them through our philanthropic arm, the Boulder Fund, we help position and equip leaders of color to effectively lead inclusive and sustainable efforts that meaningfully improve student outcomes and ultimately transform the lives of children, families, and communities of color (collectively, “Services” or “Our Services”).

By accessing, using, or otherwise interacting with any of our Channels or utilizing our Services, or by otherwise providing personal information to EdLoC, you agree to be bound by the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not access or use the Channels or provide personal information to us through any Channel.

This Privacy Policy is based upon EdLoC’s activities as a United States entity conducting business in the United States.

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## 1. **INFORMATION WE COLLECT**

### **Personal Information You Disclose to Us**

*Summary: We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.*

We collect personal information that you voluntarily provide to us when registering as an EdLoC Member, when creating an account, when participating in activities through any of our Channels (such as creating a membership profile, filling out a form or survey, applying for a grant, posting messages in our virtual knowledge management tools and/or on our community platform, or entering competitions, contests or giveaways), or when otherwise contacting us and expressing an interest in obtaining information about us or our products, services, offerings, opportunities and/or events.

The personal information that we collect depends on the context of your interactions with us and the choices you make and the services and features you use. The personal information we collect can include, but is not limited to, the following:

- **Name and Contact Data.** We collect your first and last name, email address(es), mailing address, phone number, social media links, and other similar contact data.
- **Demographics.** We collect information concerning your race, ethnicity, gender identity, age, and other similar data.
- **Education and Professional Experience.** We collect information concerning your educational background, profession/occupation, and leadership experience.
- **Taxpayer Information.** We collect W-9 forms from contractors who perform work for us as well as from Boulder Grant applicants / recipients.
- **Credentials.** We collect passwords, password hints, and similar security information used for authorization and account access.
- **Payment Data.** We collect data necessary to process the payments you make in connection with your annual membership dues and event registration fee(s), such as your payment instrument number (e.g. credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processors and you should review their privacy policies and contact the payment processors directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate and you must notify us of any changes to such personal information.

### **Information Automatically Collected**

*Summary: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Channels.*

We automatically collect certain information when you visit, use or navigate the Channels. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Channels and other technical information. This information is primarily needed to maintain the security and operation of our Channels, and for our internal analytics and reporting purposes.

### **Information Collected From Other Sources**

*Summary: We may collect limited data from public databases, marketing partners, and other outside sources.*

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information, marketing leads and search results and links, including paid listings (such as sponsored links).

## **2. HOW WE USE YOUR DATA**

We may use information collected from or about you, including your personal information and usage information, to:

- Enroll you as a Member, keep in contact with you, process your transactions, and contact you regarding any problems with your account and/or membership;
- Send you information, including confirmations and receipts, technical notices, updates, security alerts, surveys and support and administrative messages;
- Provide you with information, including the availability of goods, services, opportunities and events that may be of interest to you;
- Respond to your inquiries and provide customer service related to your membership and your use of our products and services;

- Verify your identity or eligibility, and allow you to participate in activities or events we offer including sweepstakes, rewards, contests or other promotions;
- Help us serve you better, including personalizing your online experience and tailoring content, recommendations, and offers we display to you;
- Display content, including advertising, that is customized to your interests and preferences;
- Operate and improve our website and business, including our internal operations and security systems;
- Perform research and analysis aimed at improving our products, services and technologies;
- Send you information and special offers from us or third-party business partners;
- Protect each party from errors, fraud, or any criminal activity, and serve legal, regulatory and internal business purposes;
- Detect and troubleshoot problems, resolve disputes, and enforce applicable agreements and policies; and
- Fulfill any other purpose consistent with this Privacy Policy or for purposes disclosed to you at the time we collect your information.

### **3. SHARING OF YOUR PERSONAL DATA**

*Summary: We only share information with your consent, to facilitate your use of our Channels and/or Services, to comply with laws, to protect your rights and our rights, or to fulfill business obligations.*

We may share non-personal information, such as usage information or otherwise de-identified data and aggregated user statistics, with third parties in our discretion. We may process or share data collected about you, including personal information, in the circumstances described below or elsewhere in this Privacy Policy.

When you access or use our Channels or Services, we collect, use, share, disclose and otherwise process your personal information for the purposes described in this policy. We rely on a number of legal bases to use your information in these ways. These legal bases include:

- Consent. We may share your data if you have given us specific consent to use your personal information in a specific way or for a specific purpose.

- Contractual Obligations. Where we have entered into a contract with you, we may share your personal information to fulfill the terms of our contract and/or provide our services to you.

Legitimate Interests. We may share your information when it is reasonably necessary to achieve our legitimate business interests.

- Legal Obligations. We may share your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Public Information. We may share your information when you have made the information public.
- Vital Interests. We may share your information where we believe it is necessary to investigate, prevent, or take action regarding potential violation of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Where we share your information on the basis of legitimate interests, we so do as follows:

- Transactions. We share your information as necessary to complete your transactions or provide the products or services you have requested or authorized.
- Providing and Improving Our Services. We share your information to improve and customize our Services, and we do so as it is necessary to pursue our legitimate interest in improving our Services for our users. This is also necessary to enable us to pursue our legitimate interests in understanding how our Services are being used, and to explore ways to grow our organization and online community. It is also necessary to allow us to pursue our legitimate interests in improving our Services, efficiency, interest in Services for users, and obtaining insights into usage patterns of our Services.
- Providing Marketing Communications. We rely on our legitimate interest to send you marketing messages.
- Professional Opportunities. We may share your information for networking purposes, including connecting you with individuals or organizations offering professional opportunities which may be of interest to you.

- Site Customization. We may learn about the types of products or services that you are interested in from your browsing behavior and use such information to suggest potential purchases, opportunities, events or experiences as a result. We have a legitimate interest in customizing your on-site experience to help you search for and discover relevant products, services, opportunities and experiences.
- Service Providers. We may share your data with third party-vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processors, data storage providers, data analysts, community platform providers, email delivery providers, hosting service providers, and third parties which assist us with our customer service and marketing efforts. Those companies will be permitted to obtain only the personal data they need to provide the service. We may allow selected third parties to use tracking technology on the Channels, which will enable them to collect data about how you interact with the Channels over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity.
- Business Partners. We may share your information with our business partners to offer you certain products, services or promotions.
- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our organization by another company, as well as in the unlikely event of insolvency, bankruptcy or receivership, in which case personal data would be transferred as one of the business assets of the company.
- Contests & Promotions. We may offer sweepstakes, contests, and other promotions (“Promotion”) that may require registration. By participating in a Promotion, you are agreeing to the provisions, conditions, or official rules that govern that Promotion, which may contain specific requirements of you (including, except where prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness or other indicia of persona in advertising or marketing materials). If you choose to enter a Promotion, personal information may be disclosed to third parties (including, without limitation, a co-sponsor) or the public in connection with the administration of such Promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Promotion’s terms or official rules (such as on a winners’ list).
- Boulder Fund Grants. We may publicly acknowledge and announce any relationship between EdLoC and any Boulder Fund Grant recipient, including but not limited to, the amount and purpose of the grant, any photographs the grant recipient may have provided to EdLoC, the grant recipient’s name, title, and organization and any non-

proprietary information or materials relating to the grant recipient and its activities which were used by EdLoC in evaluating the grant applicant's eligibility.

Unless described in this Privacy Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

#### **4. COOKIES AND OTHER TRACKING TECHNOLOGY**

*Summary: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons, pixels, ad tags, embedded scripts and device identifiers). These technologies may be used for many purposes, such as enabling you to sign into our online platforms, automatically collecting usage information, enabling features, and remembering your preferences. If you would like to opt out of accepting cookies, see our "Choices and Preferences" section below.

In other cases, we may allow third parties to use cookies for advertising purposes. Because your browser connects to those third parties' web servers to retrieve that content, those third parties are able to set or read their own cookies on your device and may collect information about your online activities across websites or online services. We may also work with third-party partners to show their advertisements to you on our and third-party websites.

#### **5. CHOICES AND PREFERENCES**

*Summary: If at any time you decide that you want to change your choices about how we use and disclose your personal data, you can take the following actions.*

- **Access, correction, and deletion.** To access, correct or delete certain personal data about you that we hold, you can visit the applicable section of your account settings. You are responsible for maintaining and updating, as applicable, your EdLoC membership registration data and profile with current, accurate, and complete information. For other personal data, you can contact us as described at the bottom of this Privacy Policy. However, to the extent permitted by applicable law, we reserve the right to charge a fee or decline requests that are unreasonable, excessive, or prohibited by law, could adversely affect the privacy or other rights of another person, or where we are unable to authenticate you as the person to whom the data relates.
- **Account Termination.** If you would at any time like to terminate your EdLoC membership, please [Contact Us](#). Upon your request to terminate your membership, we will deactivate or delete your account and information from our active databases.

However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations and/or comply with legal requirements.

- Marketing Emails. If you do not wish to receive marketing emails, you will have the option of opting out and/or unsubscribing from our emails and mailing lists by adjusting your marketing preferences by following the directions at the bottom of one of our marketing emails. Please note, if you choose not to receive marketing emails, you may still continue to receive transactional or account emails that are necessary for the administration and use of your account.
- Cookies. You can accept or decline cookies. Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies. Please be aware that our online Channels are optimally designed to operate with cookies enabled in your internet browser. If you choose to decline cookies, you may not be able to sign in or use other interactive features that depend on cookies. This may negatively impact your experience in our online Channels.
- Third-Party Advertising. If you would like to opt-out of information collection by third-party advertising partners or otherwise find out more information about Internet advertising companies, please visit <http://www.networkadvertising.org/choices/> and <http://www.aboutads.info/choices/>. You can prevent the companies listed from showing you targeted ads by submitting opt-outs. Opting-out will only prevent targeted ads so you may continue to see generic (non-targeted ads) from these companies after you opt-out.
- Do Not Track. Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not a common understanding of how to interpret the DNT signal, we do not currently respond to browser DNT signals. Instead, you can use the range of other tools to control data collection and use, including the cookie controls and advertising controls described above.

## **6. RETENTION OF PERSONAL DATA**

*Summary: We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal

information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **7. SECURITY OF PERSONAL DATA**

*Summary: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Channels is at your own risk. You should only access our services within a secure environment.

Your account information is protected by a password. It is important that you protect against unauthorized access to your account and information by choosing your password carefully and by keeping your password and computer secure, such as by signing out after using our Services.

## **8. FORUMS AND OTHER INTERACTIVE SERVICES**

*Summary: We are not responsible for personal data which you post in forums, message boards or other interactive areas of our Channels.*

Our Channels may include discussion forums or other interactive areas or services, including blogs, chat rooms, bulletin boards, message boards, or other areas or services in which you or third parties create, post or store content, messages, comments, materials or other items ("Interactive Areas"). If you use an Interactive Area, you should be aware that these areas, including any personal data you post or provide, may be viewable by others and may be publicly distributed outside the Channels in perpetuity.

We are not responsible for public disclosure of personal data you submit in connection with the Interactive Areas, nor are we responsible for how others might use that information, including to send you unsolicited messages. Interactive Area postings may be retained indefinitely. If at any time you would like to request that we remove a posting, please [Contact Us](#). When submitting a request, please be sure to include your full name, email address, and information sufficient to permit us to locate the submission(s) that you are requesting be removed. In some cases, we may remove only your personal information, but maintain the rest of your submission. Removal of a posting from an Interactive Area is at our discretion. Removal of a posting from an Interactive Area does not necessarily mean that the posting will be deleted from our backend systems, nor does it ensure complete or comprehensive removal of postings which may have been copied by third parties while publicly accessible.

## 9. LINKS

*Summary: We are not responsible for the policies or practices of third-party websites.*

We may link to websites that have different privacy policies and practices from those disclosed here. We assume no responsibility for the policies or practices of such linked sites.

## 10. SOCIAL MEDIA

*Summary: We are not responsible for the use of personal data which you share with third parties.*

We may offer you the ability to feed information from your social media account into your EdLoC online community platform profile. Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

We also may allow you to share personal data with third parties, such as social media networks. In these instances, you are agreeing to the data being shared and the shared data is subject to the privacy policies of such third parties. Except where required by applicable law or regulation, we do not control and do not assume any responsibility for the use of personal data by such third parties.

## 11. CHILDREN'S PRIVACY

*Summary: We do not knowingly collect personal information from minors under 13 years of age without verified parental consent.*

We do not knowingly collect or solicit personal information from anyone under the age of 13 years or knowingly allow such persons to register an account with us. If you are under 13, please do not send any information about yourself to us, including your name, address, telephone number, or email address. No one under the age of 13 is allowed to provide any personal information to or through our Channels.

In the event we learn we have collected personal information from a child under age 13 years without verified parental consent, we will delete that information as soon as possible. If you believe we may have any such information from or about a child under 13, please [Contact Us](#).

## **12. RIGHTS FOR RESIDENTS OF CERTAIN STATES / COUNTRIES**

*Summary: Certain privacy laws provide certain users with specific rights related to their personal information.*

### **California's Shine the Light Law (STL)**

California law entitles residents to ask for a notice describing what categories of personal information we share with third parties for their own direct marketing purposes. Unless you request us to or consent to it, EdLoC does not share any personal information with third parties for their own direct marketing purposes.

## **13. PRIVACY POLICY UPDATES**

*Summary: We will update this policy as necessary to stay compliant with relevant laws.*

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

## **14. CONTACT US**

If you have questions or comments about this Privacy Policy, please [Contact Us](#).