

## IRCO's Privacy Policy

IRCO is committed to protecting the personal information that you provide and entrust to us when using our websites. This online privacy statement describes how we treat all user data collected by us during your visit, both technical data that is automatically collected and voluntarily submitted data.

IRCO may occasionally update this statement. We will post any changes on this web page, and encourage you to check back periodically to make sure you understand how any personal information you provide will be used. If we do make any material changes, we will post a notice on our home page that the privacy statement has been modified.

What is personal information?

"Personal information" means information that specifically identifies an individual (such as a name, photos, address, telephone number, mobile number, email address, or credit card number, or other contact and demographic information about that individual that is directly linked to personally identifiable information). Personal information does not include "aggregate" information, which is data we collect about the use of our sites, from which individual identities or other personal information has been removed. This statement does not restrict or limit our collection and use of aggregate information.

What personal information do we collect?

We collect two types of user data: (1) data that you voluntarily submit to us, and (2) technical data that is automatically collected from all visitors to our sites.

**Voluntarily Provided Information:** We collect certain information you voluntarily provide us, such as when you join or renew your membership, make a donation, sign up for our emails, send correspondence to government officials using our tools, participate in one of our online petitions or surveys, register online for an event, fill out a form, post blog comments or other content, or participate in any activity that requires your Voluntarily Provided Information.

**Passively Collected Information:** We may use different types of technology to record certain information from your web browser. We automatically collect Internet Protocol ("IP") addresses and domain names of the originating visitor's computer and may know some information you have previously provided through cookies (a small text file containing a string of alphanumeric characters). The use of cookies is common practice, and we may use both "Persistent Cookies" and "Session Cookies." Persistent cookies remain after you close your browser and may be used by your browser on subsequent visits to this site. Session Cookies are activated when you visit IRCO sites to make a donation. Session Cookies last only as long as your session on the IRCO sites. They expire when the session ends and are not written onto your computer's hard drive. We also use Session Cookies in emails containing the HTML format.

In addition, we may use a tool called Google Analytics to collect information about use of our sites. The data Google Analytics collects is presented to IRCO in aggregate. Google Analytics collects information such as how often users visit our sites, what pages they visit, and what other sites they used prior to coming to our sites. We use the information we get from Google Analytics only to improve our sites. Google Analytics collects only the IP address assigned to you on the date you visit, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a Persistent Cookie on your web browser to identify you as a unique user the next time you visit this site, this cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google

Privacy Policy. The Google Analytics Terms of Use are available online at <http://www.google.com/analytics/tos.html>. The Google Privacy Policy is available online at <http://www.google.com/privacypolicy.html>. You can prevent Google Analytics from recognizing you on return visits to our sites by disabling cookies on your browser.

How do we use the personal information we collect?

We will not attempt to match any personally identifiable information that you provide to us with your IP address, unless there are reasonable grounds to believe that doing so would provide information that is relevant and material to a criminal investigation.

What personal information do we share with third parties?

We will not share the personal information we collect from you through our sites with third parties, except as described in this policy. For example, we may share personal information as follows:

- with vendors, consultants, and other service providers who work with us in connection with the operation of our sites or the services we provide and who need access to such information to carry out their work for us;
- when you give us your consent to do so, including if we notify you on our sites that the information you provide will be shared in a particular manner and you provide such information;
- in an aggregated or anonymized form that does not directly identify you;
- when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes or respond to lawful requests or legal authorities, including responding to lawful subpoenas, warrants, or court orders;
- when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to protect the rights, property, or safety of Stand, our users, our employees, copyright owners, third parties or the public, including without limitation to protect IRCO or our users from fraudulent, abusive, inappropriate, or unlawful use of our sites;
- to enforce or apply this policy or our other policies or agreements; and
- in connection with, or during negotiations of, any merger, sale of organization assets, financing or acquisition, or in any other situation where personal information may be disclosed or transferred as one of the assets of IRCO.

In addition, you understand that when you use our sites, information you provide through the sites (such as sharing your story, nominating an outstanding staff, commenting, etc) or share through social network sites, may be publicly available.

We are not responsible for the actions of service providers or other third parties, nor are we responsible for any additional information you provide directly to any third parties, and we encourage you to become familiar with their privacy practices before disclosing information directly to any such parties. Nothing herein restricts the sharing of aggregated or anonymized information, which may be shared with third parties without your consent.

#### Website Data Security

IRCO takes reasonable measures to protect your personal information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration, and destruction. However, please be aware that despite our efforts, no security measures are perfect or impenetrable and no method of data transmission can be completely guaranteed against interception or misuse.

IRCO proactively sustains PCI DSS (Payment Card Industry Data Security Standard) compliance using industry standard encryption methods within [www.irco.org](http://www.irco.org). This enables us to automate the continuous testing and reporting of critical IT process controls, reduce manual processes through reconciliation, and continually prove a detailed audit trail in support of the PCI requirements.

#### Links to other websites

Throughout our sites we provide links to other Web sites which may contain information of interest to our readers. We take no responsibility for, and exercise no control over, the organizations, views, or accuracy of the information contained on those Web sites.

Creating a text link from your Web site to our site does not require permission. If you have a link you'd like us to consider adding to our sites, please send an email to [info@irco.org](mailto:info@irco.org) with the subject "Link request."

#### Use of Text and Images

If you would like to publish information that you find on our Web site, please send your request [info@irco.org](mailto:info@irco.org). Where text or images are posted on our site with the permission of the original copyright holder, a copyright statement appears at the bottom of the page. Any text or image not explicitly labeled with a copyright statement is © IRCO and may not be used for any purpose without permission.

#### Opt-Out or Change Your Contact Information

Users may opt-out of receiving communications from us at any time by emailing us at [info@irco.org](mailto:info@irco.org). You may choose to receive only specific communications or none at all. Note that it may take 5-8 business days to be removed from our lists.

#### Questions about our policies

If you have any questions about this privacy statement or the practices of our sites, you can contact us at [info@irco.org](mailto:info@irco.org) or 503.234.1541