

ALLIES AGAINST SLAVERY PRIVACY POLICY

I. INTRODUCTION

This privacy policy describes the types of information Allies Against Slavery (“Allies,” “we,” “our,” or “us”) may collect from you or that you may provide when you visit the website www.alliesagainstsavery.org and related applications or platforms (collectively, the “Sites”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy applies not only to visitors to our Sites, but also to employees and interns, prospective employees and interns, our donors, volunteers, and other partners. The Sites include “Lighthouse,” a system designed and run by Allies to help identify victims of human trafficking, coordinate care, and understand trends. Lighthouse collects, presents, and aggregates data received from third parties, as further described below. Allies makes Lighthouse available to certain authorized professionals via other agreements in order to provide greater understanding and awareness to the problem of human trafficking. This Privacy Policy applies to you if you use Lighthouse or if you have provided information to Lighthouse, or if a third party has provided information about you to Lighthouse.

This privacy policy does not apply to any website operated by third parties.

Except as set forth herein, this policy does not apply to information collected by us offline or through any other means, or by any third party, including through any content that may link to or be accessible from or on the Sites. You may also be subject to another privacy policy or other terms and conditions that are posted on the Sites specific to a particular Allies program or service (“Other Agreement”). Based upon your specific relationship(s) with Allies, we may collect, use or disclose Personal Information (as defined in Section II, below) in ways described in more detail in one or more Other Agreements. To the extent any Other Agreement includes additional terms that are not covered by or are inconsistent with this Privacy Policy, the terms and conditions of the Other Agreement will supersede this Privacy Policy.

We are not a covered entity or business associate as those terms are defined by the Healthcare Insurance Portability and Accountability Act (“HIPAA”); therefore, HIPAA does not apply to the operations of Allies, including Lighthouse, or any Personal Information collected through the Sites. Notwithstanding the foregoing, the Personal Information we obtain may be otherwise protected by or governed under other state or federal law, and we will make all necessary efforts to comply with those laws to the extent they apply to your Personal Information.

Allies is committed to protecting your privacy. Please read this policy carefully. If any term in this policy is unacceptable to you, please do not use the Sites or provide any Personal Information to Allies. By accessing or using the Sites, you signify your acknowledgment of this privacy policy. This policy may change from time to time (see Revisions to Our Privacy Policy below) and your use of the Sites after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

II. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect information from and about users of our Sites, including information:

- by which you may be personally identified, such as name, physical address, e-mail address, telephone number, geographic location, IP address, health information, or any other information collected on the Sites that is defined as personally identifiable information under applicable law (“Personal Information”); and/or
- about your internet connection, the equipment you use to access our Sites and usage details.

We collect this information directly from you when you provide it to us or automatically as you navigate through the Sites. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies, as further described below.

Information We Collect About You Automatically. As with many other websites, as you navigate through and interact with our Sites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Sites, including traffic data, location data, logs, language, date and time of access, frequency, and other communication data and the resources that you access and use on the Sites.
- Information about your computer and internet connection, including your IP address, operating system, host domain, and browser type.
- Details of referring websites (URL). We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may include Personal Information. We may also maintain it or associate it with Personal Information you provide to us or that we collect in other ways or receive from third parties. It helps us to improve our Sites by enabling us to, among other things, estimate our audience size and usage patterns.

As with many other sites, our Sites may use “cookies” or other technologies to help us deliver content specific to your interests, to process your reservations or requests, and/or to analyze your visiting patterns. We may collect the following types of information about your visit including: the domain from which you access the Internet; IP address; operating system and information about the device or browser used when visiting the site; date and time of your visit; content you visited or downloaded; and website (such as google.com or bing.com) and website referral source (email notice or social media site) that connected you to the website. Our Sites may use two types of cookies: single-session (temporary) and multi-session (persistent). Temporary cookies last only as long as your web browser is open, and are used for technical purposes such as enabling better navigation through our Sites. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes including tracking the number of unique visitors to our site and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. Cookies, by themselves, will not be used by Allies to disclose your individual identity.

This information identifies your browser, but not you, to our servers when you visit the Sites. We do not respond to ‘do not track’ signals in your browser. We may also collect data by using “pixel tags,” “web beacons,” “clear GIFs” or similar means (collectively, “pixel tags”) that allow us to know when you visit our Sites. Through pixel tags, we may obtain non-Personal Information or aggregate information that can be used to enhance your online experience and understand traffic patterns.

Information You Submit to Our Sites. Allies collects Personal Information from you on our Sites when you voluntarily submit such information to us. This information may include your name, home address, email address, telephone number, date of birth, demographic information, and other information that we may need in connection with Allies events, services, and opportunities, including but not limited to employment opportunities.

The information we collect on or through our Sites may include:

- Personal information that you provide on our Sites. This includes information provided when you sign up for an opportunity, fill out an application, make a donation, or provide feedback on our Sites; and when we process or respond to your inquiries related to requests or your application.
- Your responses to questions that we might ask you to complete for application purposes.
- Your search queries on the Sites.
- When you make a payment, donation, or initiate other financial transactions on our Sites, we may collect your Personal Information to process the transaction. Your Personal Information may be encrypted and transmitted to our payment processing vendor(s) during this process.

Information We Receive From Other Sources. We may sometimes work with third parties (including, for example, third parties intermediaries with whom we partner to provide you with services such as sub-contractors, analytics providers, and search information providers) such as those third party partners who may provide us information for authorized users to access via Lighthouse. You may link to or access our Sites using other third-party websites. Use of such third party websites is subject to the terms of use and privacy policies of those third parties. Allies does not control the use of this technology or the resulting information and is not responsible for any actions or policies of such third parties.

Allies receives data, including Personal Information, from third parties related to Lighthouse. This third-party data may have been collected by a third party pursuant to that third party’s privacy policy and/or an authorization or consent. If you have a reasonable, good faith belief that a third party has provided Personal Information about you to Allies for use in Lighthouse and believe that third party gave such Personal Information to Allies in error, please contact us at info@alliesagainstsavery.org. We will use reasonable efforts to remove the data from Lighthouse provided we have enough information to verify your request.

III. HOW WE USE AND DISCLOSE YOUR INFORMATION

We may use or disclose information collected about you, including Personal Information, in the following ways:

- To complete any application or other transactions you request online such as enrolling in programs, payment processing, signing up for events, processing donations, determining eligibility for volunteer opportunities, services, or employment, or any other action you request online.
- To operate the Sites and to improve our Sites and services, which may include communicating with you, or if applicable, populating and operating Lighthouse.
- To service providers that assist us in the maintenance, improvement, and optimization of the Sites.
- To ensure that content from our Sites is presented in the most effective manner for you and for your computer or mobile phone and as part of our efforts to keep our Sites safe and secure.
- To measure or understand the effectiveness of communications we serve to you and others, and to deliver relevant communications to you and to provide you with communications from Allies, surveys, newsletters, and other information.
- To facilitate your registrations for events, volunteering opportunities, or other activities or programs.
- To process your donations to Allies.
- To send you information about Allies services, events, and programs, or to send you information we think may interest you related to our partners' services, events, and programs.
- To answer your inquiries about our Sites, organization, and other services or activities.
- To notify you about changes to our Sites.
- For any purpose where you have given your consent (where legally required).
- To comply with applicable federal and state law.

We may disclose aggregated, anonymized information about our users, and information that does not identify any individual, without restriction. Allies does not sell, rent, or otherwise provide your information to third parties for profit.

You agree that we have the right to disclose Personal Information that we collect or you provide as described in this privacy policy:

- To anyone you have authorized disclosure of information in this privacy policy or any other consent or policy, including one presented to you by a third party.
- To provide access to Allies' services and Lighthouse.

- To service providers that assist us in the maintenance, improvement and optimization of our Sites.
- To fulfill the purpose for which you provide it. For example, if you sign up for certain services or provide information for a certain purpose, we may share your information in order to provide those services and fulfill that purpose.
- For any other purpose disclosed by us when you provide the information or with your consent.
- If we are under a duty to disclose or share your Personal Information in order to comply with applicable law.

IV. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We have created mechanisms to provide you with control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Sites may then be inaccessible or may not function properly.
- **Do Not Track.** We do not currently respond to “do not track” signals as we do not track our users across third party websites.

V. DATA SECURITY

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. We follow generally accepted industry standards to protect Personal Information that is submitted to us, both during its transmission and once we receive it.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to the Sites; any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

VI. THIRD-PARTY SITES

Our Sites may contain links or references to other websites outside of our control. Please be aware that this privacy policy does not apply to these websites. Allies encourages you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit Personal Information. **ALLIES DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. PLEASE EXERCISE CAUTION AND CONSULT THE**

PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.

VII. CHILDREN UNDER THE AGE OF 13

The Sites are not intended for children under 13 years of age, and Allies does not knowingly collect or use any Personal Information from children under the age of 13 via the alliesagainstslavery.org website. If you believe that the alliesagainstslavery.org website has collected Personal Information from a child under the age of 13, please contact us at info@alliesagainstslavery.org.

VIII. REVISIONS TO OUR PRIVACY POLICY

We reserve the right to change this privacy policy at any time. It is our policy to post any material changes we make to our privacy policy on this page. The date this privacy policy was last revised is identified at the bottom of the page. You are responsible for periodically monitoring and reviewing any updates to the privacy policy. Your continued use of our Sites after such amendments will be deemed your acknowledgement of these changes to this privacy policy.

IX. CONTACT INFORMATION

If you have any questions about this privacy policy, please contact info@alliesagainstslavery.org.

X. EFFECTIVE DATE

This privacy policy is effective dated July 16, 2020.