

# **Donor Privacy Policy**

# Per Scholas Donor Privacy Policy

This privacy policy is designed to explain our practices for collecting, disclosing and protecting the personal information of our donors received through our website, the phone, email, mail, and any other medium. Per Scholas is committed to protecting the privacy of our supporters and does not collect information about you, other than as described below. By submitting information to Per Scholas or to any of its staff, you consent to the terms and conditions of this policy.

#### What constitutes personal information?

"Donor personal information" is any information that identifies donors—such as their names, addresses, telephone numbers and email addresses.

## Per Scholas collects donor information in the following ways:

- Per Scholas may collect donors' names, mailing addresses, and email addresses in response to inquiries from donors submitted on the website, in person, by phone or email.
- Per Scholas may collect donors' names, mailing addresses, email addresses and other contact information if they register for an event Per Scholas organizes.
- Per Scholas may collect donors' names, email addresses, telephone numbers, information and billing addresses when donors make a contribution on the Per Scholas website, over the phone or by mailing in a check.

## Per Scholas uses donor information in the following ways:

- Per Scholas' mission is to advance economic equity through rigorous training for tech careers and to connect skilled talent to leading businesses.
  Per Scholas has a legitimate interest to understand and meet the needs, concerns, and interests of our donors in order to operate optimally as a nonprofit. In furtherance of our mission, Per Scholas processes data consisting of: using donor information to analyze overall giving patterns and make more accurate budget projections, understand donors' interests in our mission, sending fundraising materials and event invitations to individuals via email or mail based on our previous relationship; conducting research and analysis and reviewing publicly available information about our supporters to aid in fundraising efforts.
- Per Scholas will use donor personal information, when necessary, to comply with the law (such as Internal Revenue Service requirements), when acting in good-faith belief that such action is necessary to conform to the requirements of the law or to comply with



legal processes required of Per Scholas. Per Scholas may also use donor personal information to protect and defend Per Scholas' rights.

• Per Scholas will use donor personal information to protect against potential fraud. For example, Per Scholas may verify with third parties the information collected in the course of processing a gift, event registration or other donation. If a donor uses a credit or debit card on the Per Scholas website, Per Scholas may use card authorization and fraud screening services to verify that the card information and address matches the information that was supplied to Per Scholas and that the card being used has not been reported lost or stolen.

#### Sharing of Your Personal Information and Protecting Your Privacy

Per Scholas will never rent, trade or sell donors' e-mail addresses with any other organization. Per Scholas may on occasion share donors' names and mailing addresses with its service providers (such as those who provide donor research services or mailing services). Per Scholas will not send mailings to Per Scholas donors on behalf of any other organization. Except as described in this policy, Per Scholas does not otherwise disclose donor personal information to any third parties.

Donors may choose to make an online donation via Per Scholas' website by using a payment card. Typically, payment card information is provided directly by users, via the Per Scholas website, into the PCI/DSS-compliant payment processing service Classy with which Per Scholas has contracted, and Per Scholas does not, itself, process or store the card information. When Per Scholas receives payment card information from donors by methods other than our website, it is entered by Per Scholas' employees into the PCI/DSS-compliant payment processing service as instructed by the donor, and the information is then deleted or destroyed. Per Scholas strongly discourages donors from submitting this information via email.

We restrict access to our donor's personal data to only those employees who need access in order to provide benefits or services to our donors. Per Scholas provides employee training on the importance of confidentiality and maintaining the privacy and security of donor information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities. Please be aware that, despite our efforts, no security measures are perfect or impenetrable. In the event of a security breach, we will promptly notify donors and the proper authorities if required by law.

We will retain donor personal information for as long as it is necessary to fulfill the purposes outlined in this Donor Privacy Policy, unless a longer retention period is required or permitted by law, or until the donor requests that we erase or anonymize their data. Donors have the right to remain anonymous. All requests for anonymity will be strictly honored. Donors have the right, upon request, to promptly review any donor personal information that Per Scholas has collected about them.



Depending on residence, the donor may have the right to request access, correction or erasure of personal information held by Per Scholas. The donor also may have the right to object or request the restriction of processing of their personal information. The donor may also be entitled to receive their personal data in a structured and standard format. Finally, the donor may also lodge a complaint with the competent data protection authority regarding the processing of their personal information.

For more information, please contact us at <u>development@perscholas.org</u>.

## Opt-Out

Donors, both online and off-line, may opt-out of specific or all correspondence with Per Scholas at any time by contacting Per Scholas at development@perscholas.org, or sending a letter to the address below. (Donors cannot opt out of sharing their name and mailing address with Per Scholas' service providers.)

## **Revision of This Policy**

Per Scholas reserves the right to change this Donor Privacy Policy from time to time, without advance notice. Accordingly, we recommend that you check for updates to this Privacy Policy on an on-going basis. If we make any significant changes in the way we use your personal information, we will alert you by posting a prominent notice on our site.

## **Contact Us**

If you have any questions about this Donor Privacy Policy, please contact: Per Scholas 804 E 138th St Bronx, New York, NY 10454 Phone: (718) 991-8400 Email: <u>development@perscholas.org</u>