



PRIVACY POLICY

Last updated December 19, 2019

Thank you for choosing to be part of our community at Family Nurturing Center of Massachusetts, Inc. (“**Company**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@familynurturing.org.

When you visit our website <https://www.familynurturing.org/>, and use our Services, you trust us with your personal information. We take your privacy very seriously. In this document, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as <https://www.familynurturing.org/>), and/or any related services, programs, marketing or events (we refer to them collectively in this privacy policy as the “**Services**”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us such as name, address, contact information, and payment information.*

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our programs and services, when participating in activities on the Services or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the features you use. The personal information we collect can include the following:

Name and Contact Data. We collect your first and last name, email address, postal address, phone number, and other similar contact data.

Payment Data. We collect data necessary to process your payment if you make donations, such as your payment instrument number (e.g., credit card number), and in some cases the security code associated with your payment instrument. All payment data is stored by Click & Pledge, Greater Giving, or Donor Drive (used for Ride for Kids fundraising). You may find their privacy policy link(s) here:

<https://clickandpledge.com/>

<https://www.greatergiving.com/en/lp/privacy-statement/>

<https://www.donordrive.com/donordrive-platform-privacy-policy/>

Information automatically collected

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

We automatically collect certain information when you visit, use or navigate the Services. 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 Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

2. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Services for a variety of program purposes described below:

We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To notify you about our activities or related services.** You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).
- To send administrative information to you.** We will use this information to provide you relevant information regarding our available programs and services.
- To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Legal Obligations:** We may disclose 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).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations 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.

4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following third parties.

- **Online Donations:** Click & Pledge (website fundraising), Donor Drive (Ride for Kids fundraising platform), Greater Giving (Gala fundraising)
- **Database, Mailings, Surveys:** Salesforce, Mail Chimp, Form Assembly
- **Website Hosting:** A2 Hosting

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party 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 processing, data analysis, email delivery, hosting services, customer service and marketing efforts. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organization apart from us. They will hold it securely and retain it for the period we instruct.
- **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 business to another company.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: 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).

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: 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 Services is at your own risk. You should only access the services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at info@familynurturing.org.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.
- Upon your request to terminate your account, we will delete your contact details 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.

9. DATA BREACH

A privacy breach occurs when there is unauthorized access to or collection, use, disclosure or disposal of personal information. You will be notified about data breaches when Click and Pledge, our third party vendor, if they believe you are likely to be at risk of serious harm. In the event that Family Nurturing Center of Massachusetts, Inc. becomes aware of a security breach which has resulted or may result in unauthorized access, use or disclosure of personal information. Family Nurturing Center of Massachusetts, Inc. will promptly investigate the matter and notify the applicable Supervisory Authority not later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from our systems.

12. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, 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.

13. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at info@familynurturing.org or contact us by post:

Family Nurturing Center of Massachusetts, Inc.
200 Bowdoin Street
Dorchester, MA 02122
United States

14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. You can write to info@familynurturing.org to request a change in your personal data.

15. COOKIES POLICY

Like most websites, we may employ “cookies” or similar technologies on certain pages of our Websites. Cookies make the use of the Websites easier by, among other things, saving your preferences.

We may also use cookies to deliver content tailored to your interests. We may use information collected with cookies to statistically analyze usage of our Websites, and to improve and customize our content and other offerings.

Types of cookies we may use on our Websites include:

Third-party cookies: We may permit third-party service providers to place cookies through our Websites to provide us with better insights into the use of the Websites or user demographics or to provide relevant services to you. These third parties may collect information about a user’s online activities over time and across different websites when he or she uses our Website.

For example, we may use a third-party tool to analyze usage patterns of the Websites. Such a tool may generate a cookie to capture information about your use of the Websites which the third-party provider uses to compile reports on website activity for us and to provide other related services. The third-party provider may use a portion of your IP address to identify its cookie.

We do not control the use of third-party cookies or the resulting information and we are not responsible for any actions or policies of such third parties. In particular, our Websites may use Google Analytics and Mailchimp to collect and process data. For more information on Google Analytics, please see Google’s privacy policy and Google Analytics help pages (located at <https://www.google.com/policies/privacy/> and <https://support.google.com/analytics/?hl=en#topic=3544906>). To opt out of

being tracked by Google Analytics across all websites, please visit <https://tools.google.com/dlpage/gaoptout>.

Analytical or Customization Cookies

Google Analytics –Collects anonymized information about how users use the Websites, including the number of users visiting the Websites, where they came from, and the page or pages they visited.

Mail Chimp –Cookie tracker in emails improves the understanding of our users to provide more user-friendly information to them.