

INTERNATIONAL LITERACY AND DEVELOPMENT'S PRIVACY POLICY

What is the purpose of this document?

International Literacy and Development (“ILAD”) is committed to protecting the privacy and security of your personal data. This Privacy Notice explains how ILAD collects and processes your Personal Data. Each time you use our Site, the current version of the Privacy Notice will apply. Accordingly, whenever you use our Site, you should check the date of this Privacy Notice and review any changes since the last version. This Privacy Notice is applicable to all Site visitors, registered users, and all other users of our Site.

“Personal Data” is any information that enables us to identify you, directly or indirectly, by reference to any identifiers such as your name, identification number, location data, online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

By visiting www.ilad.ngo (the “Site”), you acknowledge that you have read and understood the processes and policies referred to in this Privacy Notice and consent to our data collection, use, sharing and processing practices as set forth in this Privacy Notice.

This notice describes how we collect and use personal data received directly from individuals in accordance with applicable Data Protection Laws. It is directed toward and addresses the individuals whose personal data will be processed. As such, all references to “you” or “your” that follow refer to the individuals whose personal data will be processed by us. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of and understand how and why we are using such information and how your personal data is processed. This privacy notice supplements the other notices and is not intended to override them.

Our Commitment to Data Protection

It is the policy of ILAD to exercise a high standard of care in its handling of the personal information it collects, processes, uses, and shares. As such, all data is transmitted and collected using an encrypted SSL/TLS connection via the HTTPS protocol. ILAD will maintain appropriate policies and processes throughout our organization to enhance the protection of personal data and ensure compliance with applicable laws and regulations. ILAD is also committed to the periodic review and augmentation of these policies and processes as part of its privacy program.

Controller

ILAD is a “Data Controller”. This means that we are responsible for deciding how we hold and use personal data about you.

Our Chief Privacy Officer

Our Chief Privacy Officer oversees compliance with and questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Chief Privacy Officer using the details set out below:

Chief Privacy Officer
ILAD
P.O. Box 383153
Duncanville, TX 75138
Email: privacy.officer@ilad.email

Changes to this Privacy Notice and Your Duty to Inform us of Changes

This notice may be updated from time to time. This version is dated July 29, 2019, and previous versions can be obtained by contacting our Chief Privacy Officer. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Defined Terms

In this notice:

“We”, “us”, or “our” refers to one or more of ILAD and its related entities, as well as any outside consultants, vendors, and contractors that we may use.

“You” or “your”, refers to the individual, business or organization whose personal data may be processed by us.

There are other terms with specific meanings. Those meanings can be found in Section 9: Glossary of Key Terms.

Contents of this Privacy Notice

This notice sets out the following:

1. The Data We May Collect About You (Your Personal Data)
2. Where We Might Collect Your Personal Data From
3. How We Use Your Personal Data
4. Consent
5. Data Security
6. Retention of Your Personal Data
7. International Transfers
8. Your Rights
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Section 1: The Data We May Collect About You (Your Personal Data)

Depending on the type of communication or transaction, we may collect and process the following personal data:

Updated: June 8, 2020

- Name
- Email Address
- Postal Address
- Relationships to other donors in our database
- Age
- Gender
- Telephone numbers
- Donation Designation
- Amounts of Donations
- How did you hear about us?
- Comments from you

If you are registering for an event, in addition to the above we may also collect the following information:

- Marital Status
- Children's name and address if they are attending an event with you
- Emergency contact information
- Lodging dates, meals, and preferences
- Workshops and classes you will be attending

If you are registering your child for an event, we may collect the following information:

- Name and address
- Date of birth
- Emergency contact information
- Allergies
- Whether or not the child has any special needs or health concerns.

If you are making a donation, we process all credit card, debit card, and EFT gifts (including electronic gifts by phone and in-person) through [Blackbaud Merchant Services](#) (BBMS) and thus do not retain any credit card, debit card, or bank account information. However, BBMS does retain that information and you can read their privacy policy here:

<https://www.blackbaud.com/company/privacy-policy/north-america>. Blackbaud's PCI compliance information may be found at <https://www.blackbaud.com/pci-compliance>.

Event registration payments or other similar payment transactions may be processed via PayPal. Generally, written response cards with donor-provided information are processed as soon as possible after the event and the cards are shredded immediately afterwards. For more information about PayPal, you can see their privacy statement here:

<https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

In addition, ILAD uses [eTapestry](#), a hosted donor management system provided by [Blackbaud](#). All access to donor information is strictly limited to professional staff of ILAD whose job requires them to process this data. The donor management system personnel with Blackbaud would only access such data if needed to resolve technical support issues and only with our approval.

When you make a donation in honor or memory of a loved one, we collect payment and contact information about you, as well as the name, email address, and mailing address of the recipient. You may create a personal message to the recipient, which is stored on our servers.

With regard to each of your visits to the Site we will automatically collect the following information:

- Technical information
- Information about your visit
- Location information

Non-personal data. Personal data does not include data where the identity has been removed (anonymous data). We collect information that is sent to us automatically by your web browser and we may use this information to generate aggregate statistics about visitors to our Site, including, without limitation:

- IP addresses
- Browser type and plug-in details
- Device type (e.g. Desktop, laptop, tablet, phone, etc.)
- Operating system
- Local time zone

ILAD uses a number of third-party services to perform tracking and analytics. Currently we use the following (their privacy policies are linked here):

- Lucky Orange: <https://www.luckyorange.com/privacy.php>
- Google Analytics: <https://policies.google.com/privacy>
- Facebook Pixels: <https://policies.google.com/privacy>
- Adform: <https://site.adform.com/privacy-center/overview/>

We may use Non-personal Data for various business purposes such as providing customer service, fraud prevention, market research, and improving our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data under the law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect and process information about your interactions with us, including details about our contacts with you through email, SMS, social media, U.S. Post, on the phone or in person (i.e., the date, time, and method of contact), details about donations you make to us, events or activities that you register for or attend and any other support you provide to us. We may also collect and record any other relevant information you share with us about yourself, including your interests or your affiliations with other charities, community groups, or your employer.

Updated: June 8, 2020

Section 2: Where We Might Collect Your Personal Data From

We collect your personal data from you by filling in forms or by corresponding with us by mail, phone, email, social media, SMS or otherwise.

Section 3: How We Use Your Personal Data

We will only process your Personal Data including sharing it with third parties, where

1. you have provided your consent which can be withdrawn at any time,
2. the processing is necessary for the performance of a contract to which you are a party,
3. we are required by law,
4. processing is required to protect your vital interests or those of another person,
5. processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

We may use Personal Data for the following purposes:

- To carry out our obligations arising from any contract entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about our work or our activities;
- To fundraise in accordance with our internal policies and procedures;
- To organize events that you have registered for, and to provide you with information, and other materials, relating to the content of the event, the agenda, the speakers, sponsors and other attendees;
- To process donations and contact you regarding any questions related to your donation;
- Issue receipts for your donation or other payment;
- To send you updates on how your donation has been used, project appeals, matching opportunities, and other projects that we think will be of interest to you;
- To notify your friends and family about your donation in their honor if you ask us to;
- To provide our newsletters and publications, provided you have given your consent;
- To respond to your questions and provide related services;
- To provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- To provide you with information about events, products or services we feel may interest you, provided you have given your consent;
- To respond to applications for employment;
- To transfer your information as part of a merger of the organization or outsourcing of administration to a third-party contractor;
- To administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Site to ensure that content is presented most effectively for you and your computer;
- As part of our efforts to keep our Site safe and secure; and

- Where we are required by law to disclose or otherwise use your information.

Marketing

We do not share your personal data with any company or organization for marketing purposes.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Chief Privacy Officer.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Data

We may share your Personal Data for the purposes described in this Privacy Notice with:

- Internal parties: This includes but is not limited to Development Division staff, Information Technology Department staff, Finance Department staff, Board members, Legal Division staff, and field leadership;
- The project leader and organization running the project when you donate to a project, unless you request anonymity;
- The staff member who is the project fundraiser when you designate your donation for a specific project, unless you request anonymity;
- Your employer when you make a donation that is part of a campaign sponsored by your employer and/or when your employer is being asked to match your donation;
- With partners, suppliers, and sub-contractors;
- Service providers who provide IT and system administration services;
- Credit Card Transactions, Electronic Fund Transfers, Payments by Check or Money Order and Online Financial Transactions. ILAD hires third parties to provide credit card, bank, payment and information processing services. If you choose to make a donation online, by phone, through the mail or by other means, your personal information will be shared with our processing service providers;
- Analytics and search engine providers that assist us in the improvement and optimization of our Site;
- Trusted third-party companies and individuals, such as fundraising consultants or independent auditors;
- In the event that we sell or buy any business or assets, or merge or affiliate with another organization, we will disclose your Personal Data to the prospective seller or buyer or merger partner of such business or asset;

- If we have reason to believe that there has been some inappropriate interference with or use of our website, communications, charitable services or personal or real property, or if we have reason to believe that one of the ILAD website users, donors, employees or other related parties may have been injured or may have harmed some other party, we will disclose, without notice to you, personal information as we deem appropriate or if compelled by a legal or regulatory authority.

Cookies

Like most websites, our servers automatically collect certain technical information when you visit our Website, including your IP address, browser type, browser language, the date and time of your visit, the referring URL, and, if you have visited our Website before, one or more cookies that may uniquely identify your browser. We also collect information about your activities on the Website, such as the pages you access.

In order to collect this information, the Website places a cookie on your device. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. We also use web beacons and other technologies to track usage patterns.

We use several tools to collect information about use of this Website. These tools collect information such as how often you visit this Website, what pages you visit when you do so, what elements you interact with, what other sites you used prior to coming to this Website, or 3rd-party audience data (such as age, gender and interests). We use the information we get from these tools to improve our Website, for website analysis and statistics, and respond to service requests you make.

Information about Children

We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to provide us with their personal information without verifiable parent or guardian consent. If you are under 18, do not send any information about yourself to us, including your name, address, telephone numbers, or email address, unless you have your parent's or guardian's permission. In the event we learn that we collected personal information from anyone under the age of 18, and do not have a parent or guardian's consent, we will delete that information as quickly as possible.

We do collect the name, age, and address of any children who are attending certain events with their parents, older sibling or other close relative. This information is submitted by the parents. We do this to plan age-appropriate children's programs for the children during the events and to determine how many children to prepare for in each program. As noted above, if you are registering a child for an event, we also collect information about the child's allergies and any special health concerns or special needs.

While we do not knowingly solicit personal information regarding a donor from children under the age of 18, we do occasionally receive donations from minors. If that happens, we may not know that such donor is a minor. However, we do not require a minor to supply us with any personal information other than is necessary to process the donation. All personal information we do collect can only be accessed by authorized ILAD staff and volunteers, and only those people who require access may see this information for the purposes described above. We work diligently to preserve the confidentiality, security and integrity of that information.

ILAD is deeply committed to the safety and welfare of minors. We have policies and procedures designed to ensure compliance with applicable privacy laws and employ generally accepted best practices, especially as it relates to parental notice and consent. Parents have the right to request at any time that the information collected about their child be removed from ILAD networks and databases. You can contact ILAD at privacy.officer@ilad.email.

In addition, in accordance with certain state laws, minors under the age of 18 may remove or request and obtain removal of content and information that they post on the Site.

If you believe that we might have any information from or about anyone under the age of 18, or if you wish to remove or request and obtain removal of content and information, please contact us at privacy.officer@ilad.email.

Section 4: Consent

In order to properly process your donations to ILAD, keep you informed as you request regarding publications and notices, contact you as you request regarding employment or volunteer opportunities, and properly register you for events, we and other external third parties must process your personal data, as set out against the relevant purpose.

Your consent to this processing is necessary for us and the others, to achieve this.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to contact you, process your donation, and accept you as a participant at an event.

Section 5: Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed in an unauthorized way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Section 6: Retention of Your Personal Data

We will keep your personal data for at least the length of time specified in our Document Retention and Records Management Policy. Generally, if you are hired, records are retained for

the duration of your employment plus seven years after your termination of employment. If you are not hired, your application records are retained for three years after the final decision date to not hire you. If you are a donor to ILAD, electronic giving records are generally retained since the date when you first became a donor to ILAD. If you are a participant in an event, records will be retained for at least three years, unless you are hired.

Records may be retained for longer periods of time if necessary. In particular, for contractual or legal obligations, audit requirements, dispute resolution, and to prevent abuse. Also, as long as there is any possibility that either you or we may wish to bring a legal claim, or where we are required to keep your personal data due to legal or regulatory reasons, we will retain records.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If you would like a copy of our Document Retention and Records Management Policy please contact our Privacy Officer.

Section 7: International Transfers

We will transfer your data to some individuals who are not in the United States. These primarily include our field supervisory personnel but may include others such as subcontractors. Those transfers would be made in compliance with the relevant privacy laws.

If you would like further details of how your personal data would be protected if transferred, please contact our Chief Privacy Officer.

Section 8: Your Rights

If you have any questions about this privacy notice or in relation to our use of your personal data, you should first contact our Chief Privacy Officer. Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal data/special category of data;
- provide you with a copy of the personal data that you have provided to us;
- update any inaccuracies in the personal data we hold;
- delete any special category of personal data/special category of data that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- send your personal information in a structured, commonly used, machine-readable format so that it can be easily transferred and used by a third party;
- object to any processing based on legitimate interest grounds unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your personal data while a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege).

If you wish to exercise any of the rights set out above, please contact our Chief Privacy Officer.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Your Right to Complain to a Supervisory Authority

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights in Section 8: Your Rights, or if you think that we have breached the GDPR or other privacy law, then if you are in the European Union you have the right to lodge a complaint with a member state supervisory authority for data protection issues. If you are in the United States, then there may be other state and federal regulatory agencies to whom you may file a complaint.

We would, however, appreciate the chance to deal with your concerns before you approach a supervisory or regulatory authority, so please contact us initially.

Links to Other Websites

Other websites, including those of our partners (links to which appear on ilad.ngo), have their own privacy policies. When you provide personal data at one of those sites, you are subject to the privacy policy of the operator of that site, not the ILAD Privacy Policy. We encourage you to read that policy before submitting any personal data.

You should take additional steps to safeguard your personal data online. To learn more about how to protect yourself, visit the Federal Trade Commission website (US) or the Information Commissioner's Office (UK).

Section 9: Glossary of Key Terms

“We”, “us”, or “our” refers to ILAD or one or more of the wholly owned single-member LLC’s of ILAD, or other related entities.

“You” or “your” refers to the individual whose personal data may be processed by us and our authorized third parties, whether delivered directly to us by you or on your behalf by a vendor or contractor of ours.

Key data protection terms:

- Data Protection Laws means all laws and regulations relating to the processing of personal data, including the GDPR, state laws, and federal laws, as the same may be in force from time to time.
- GDPR is the European Union General Data Protection Regulation and the UK Data Protection Act, which replaces the UK Data Protection Act 1998 as of May 25, 2018.
- Data Controller is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.
- Personal Data is any data from you which can be identified and which relates to you. It may include data about any claims you make.
- Processing of personal data includes collecting, using, storing, disclosing or erasing your personal data.

Privacy Policy Updates

Our Privacy Policy is regularly reviewed to make sure we continue to serve the privacy interests of our donors and other constituents. If our information practices change materially, we will notify you of these policy changes by posting them on the privacy page of this website and we will ensure that these changes are brought to your attention.

Last Updated: June 8, 2020

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privacy.officer@ilad.email

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