

Wallingford Community Senior Center Privacy Policy

Introduction

These are policies and practices of Wallingford Community Senior Center (WCSC) with regard to the collection and use of personal information from users of www.wallingfordseniors.org, participants, volunteers, and donors. Throughout this policy, the terms "we," "us," and "our" are meant to include WCSC staff, contractors, and volunteers.

We have the utmost respect for your privacy and will not trade, sell or exchange your personal information with anyone, except as described below. When it comes to collection and use of personal information, our guiding questions are:

"Will having this information help us better serve this individual?"

"Do we have permission to use the information in this way?"

Information we collect

Participant information

All personal information contained in WCSC files and records, as well as information learned in performing duties, is confidential. It may not be shared, released or discussed with unauthorized persons but is only to be used by personnel authorized to perform duties relative to these files and records.

At the same time, our funders want to make sure that we reach a broad representation of older adults in the community. As a result, they require us to track numbers and demographic information about the people who participate in our programs. At a minimum, we ask for your name, year of birth, phone number and zip code. We ask members more extensive information to be in greater compliance with government reporting requirements.

Information related to social work is stored separately from general participant and membership information. Any paper files generated are stored in a locked cabinet in a locked room. Electronic information is stored in SchedulesPlus in a separate section of the database and is password protected.

Payment information

We record if you have paid for a program, service, membership, or if the money received is a donation. If you pay by check, we keep a scan of your check. If you pay by credit card, we keep a record of the transaction. We do not store your credit card number electronically on site. Any paper records of your credit card number are securely stored until we enter them into an on-

line processor; they are then immediately destroyed. We are compliant with the Payment Card Industry Data Security Standard (PCI DSS).

When you donate through a third-party platform, such as Facebook or CiviCore, please see their privacy policies to see what information they make available to us.

When you make a donation to WCSC, we may acknowledge your generosity in our annual report, website, and other marketing and fundraising materials, unless you request at the time of your donation to be acknowledged anonymously. We will also use the information you provide to deliver notes of thanks, and tax receipts.

Information about website users and usage

WCSC may gather information about the users of our website. When you visit our website, a third party may collect information about your session (e.g. session length, pages visited, files downloaded) based on the IP address of your computer. This information is then stored in log files. Log data is used in aggregate to analyze how people use our website. We do not collect individual information about your use of our website.

Information through participating in a survey, raffle, or contest

WCSC may have optional surveys, raffles, and contests, in which we may ask you for additional information about your experience, opinion, or demographics. Information associated directly about you is stored securely, and is accessible only by staff. If your participation in a survey, raffle, or contest entitles you to a prize or other gift of thanks, we will use information you provided to us to fulfill your prize.

How information is stored and destroyed

We store information about WCSC participants, volunteers, and donors in SchedulesPlus, a secure database located in the cloud. Information about large donors is also stored in Quickbooks on WCSC's secure server, and accessed through an accounting program that is stored on a secure computer on site. We may use a secure cloud-based storage site, such as dropbox.com to transfer information.

Google analytics tracks our website usage on their site. Facebook tracks usage of our Facebook page and related fundraisers and events through their site, and shares it with us in aggregate through their analytics service.

Before the installation of SchedulesPlus 9/1/2017, we collected and stored membership and demographic data on paper forms. These forms are kept in a locked filing cabinet in a locked room.

All data, electronic and on paper, is stored for as long is as required by contract or in accordance with the WCSC Document Retention policy, a separate document. It is then destroyed in accordance that that policy.

How we use the information

Personal information

If you are a participant in WCSC, we must provide to our government funders your unique personal identifying information, such as your name and address. This data is typically reported monthly at a secure upload site. Please see the City of Seattle or King County's privacy policies for who has access to this data, and how they use, store, and destroy this information.

If you are a volunteer, participant, or donor, and have given us your email address, we may use information you've provided to give you information about our programs. We may also send you by email occasional invitations to surveys, appeals for funds, and administrative or other similar notices. You have the option to opt out at any time.

When you submit questions or comments to a WCSC staff member by email, we will use your email address to respond directly to you.

Except as explained in this policy, WCSC does not send unsolicited email.

If you supply us with your postal address, or the postal address of an important contact, you and any contact you supply to us may receive periodic mailings from us with information on programs and services, fundraising, or upcoming events.

If you supply us with your telephone number we will only call you regarding our programs and services, donations, or to update contact information.

Aggregated and segmented information

We analyze data you provide in aggregate and in segments and use this information to

- provide better and more efficient services and programs to our participants
- develop more successful fundraising strategies
- create better content for our website and newsletter users.

We also provide information in aggregate and in segments to our non-governmental funders, such as private and corporate foundations.

Emergency contacts

Participants in WCSC programs may provide WCSC with the name and contact information for someone that should be reached in the event of an emergency. WCSC will make a good-faith effort to reach your emergency contact. In the case of a wide-spread emergency or disaster, WCSC may not have the ability to reach all emergency contacts, and should not be relied upon to do so.

Who has access to information

Staff, contractors, and volunteers who have signed confidentiality waivers have enough information about participants to be able to do their jobs.

The social worker and social work interns have access to information related to the social work that they provide. Other personnel do not have access to this information. It is password-protected.

We will not share individually-identifying personal information about you with third parties without your permission, with the exception of:

- Government funders that require this data-sharing as a part of our contract to provide services
- Companies with whom we may contract with to fulfill services on our behalf (e.g. delivering email or mail, or executing credit card transactions)

Compliance with Legal Requirements

We may disclose personal information if we are required to by law, or we believe that such action is necessary to (a) comply with the law or with legal process, (b) protect and defend our rights and property, (c) protect against misuse or unauthorized use of WCSC's work, or (d) protect the personal safety or property of our users or the public. As such, if you attempt to pose as someone else, we may disclose information about you or your actions as part of an investigation into any harm done by your actions.

WCSC is a "Sensitive Location"

It is Department of Homeland Security's Immigration and Customs Enforcement (ICE) policy that, absent a lawful exception, enforcement actions will not occur at sensitive locations. WCSC has declared that it is a sensitive location because it serves vulnerable older adults, including those who are frail, or with mental and/or physical disabilities. WCSC's procedure in the event of an enforcement action, and what information it may share with ICE is defined in Board Resolution No. 01-2018, and in accordance with City of Seattle Adult and Disability Services policy.

Business Transitions

If WCSC were to merge with or acquire another entity, or sell all or a portion of its assets to another nonprofit organization, information regarding its participants, volunteers, donors, and/or website visitors may be transferred.

How you can manage the use of your information

WCSC maintains information about our participants, volunteers, donors, and other partners. Upon request we will provide you with the records that we maintain about you. If you need this information corrected or updated, or if

you do not want personally-identifying data shared with government funders, please call, email, or write us at the contacts provided below.

Members and volunteers may opt out of having their name used in the Sympathy and Get Well sections of our newsletter and electronic communications, and in announcements in the center. They may also opt out of having their picture used in WCSC media releases.

If you wish to have no email contact, phone contact, or mailings from WCSC, please call, email, or write us at the contacts provided above. We will process the request within 30 business days of receiving notice. We reserve the right to contact you for customer service purposes regarding any transactions you initiate with WCSC.

If you feel that this organization is not following its stated privacy policy, you may contact us at the above addresses or phone number, the DMA's Committee on Ethical Business Practices at ethics@the-dma.org, state or local chapters of the Better Business Bureau, the state or local consumer protection office, or the Federal Trade Commission by phone at (202) 382-4357 or at <https://www.ftccomplaintassistant.gov/#&panel1-1>.

Miscellaneous

We do not currently partner with or have special relationships with any ad server companies. WCSC is not responsible for the content or the privacy policies of websites to which it may link.

From time to time, we may use personal information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will post the policy changes to our website to notify you of these changes. If you are concerned about how your information is used, you should check back at our website periodically.

Contact information

4649 Sunnyside Ave North, #140 Seattle WA 98103

Email: register@wallingfordseniors.org

Phone: (206) 461-7825

www.wallingfordseniors.org