

# **Privacy Policy**

Protecting your private information is our priority. This Privacy Policy applies to Vermont Works for Women, including <a href="https://www.vtworksforwomen.org">https://www.vtworksforwomen.org</a> and third-party vendors used by VWW, and governs data collection and usage. By using VWW's website, you consent to the data practices described in this statement.

# **Collection and Use of your Personal Information**

Vermont Works for Women only collects personal information about website users and program participants that we consider necessary for providing our services in an effective and customized manner, such as your:

- First and Last Name
- Mailing Address
- E-mail Address
- Phone Number
- Employer
- Job Title

If you donate to VWW online or complete a purchase our website, we collect billing and credit card information. This information is used to complete the purchase transaction.

VWW also collects demographic information, that may include but is not limited to, your:

- Age
- Gender
- Race/Ethnicity
- Income
- Disability Status

VWW collects sensitive information such as income and disability status to better understand the populations we serve and to secure funding from donors interested in aiding specific populations. We collect race and ethnicity data to ensure that we are equitably serving a diverse and representative population.

Vermont Works for Women uses personal information to maximize successful program delivery. Information is used to identify a participant's employment needs and to assess each participant's unique situation to better serve the participant.

We also use personal information for aggregated reporting purposes. All data used in reports to donors is compiled into summaries and scrubbed of any and all personally

identifiable information; we report data in aggregate so that data is presented as percentages or total numbers (e.g. X participants served live in Chittenden County or X % of participants served have less than a bachelor's degree). A quote from a participant may be disclosed in a report only at the authorization of the participant.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to get involved with the organization. These may include: (a) subscribing to our newsletter; (b) donating; (c) sponsoring a program; (d) volunteering; (e) registering for a program or service. To wit, we will use your information for, but not limited to, communicating with you in relation to communications/programs/services you have requested from us. We also may gather additional personal or non-personal information in the future.

## **Sharing Information with Third Parties**

VWW does not sell, rent or lease its customer lists to third parties.

VWW may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to VWW, and they are required to maintain the confidentiality of your information.

VWW may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on VWW or the site; (b) protect and defend the rights or property of VWW; and/or (c) act under exigent circumstances to protect the personal safety of users of VWW, or the public.

### **Tracking User Behavior**

VWW may keep track of the websites and pages our users visit within VWW, in order to determine what VWW programs and services are the most popular. This data is used to deliver customized communications and marketing to community members whose behavior indicates that they are interested in a particular subject area.

#### **Automatically Collected Information**

Information about your computer hardware and software may be automatically collected by VWW. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the VWW website.

#### Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

## **Security of your Personal Information**

VWW has a Secure Sockets Layer (SSL) certificate for its website https://www.vtworksforwomen.org.

Vermont Works for Women follows generally accepted industry standards to protect personal information. Basic contact information is stored in a secured server maintained by Vermont Works for Women and our IT contractor. Sensitive personal information is stored in an encrypted case management database and registration system maintained by our database providers. Our case management database provider's software meets current HUD Domestic Violence, HMIS, and Social Security Administration data management and security protocols, FedRAMP ready, as well as minimum required FERPA and HIPAA standards. Likewise, our registration database provider's software is GDPR, CCPA, and PCI DDS compliant.

We treat data as an asset that must be protected against loss and unauthorized access. Besides employing a variety of security techniques to protect against data breaches, Vermont Works for Women staff and volunteers have signed confidentiality agreements, forbidding the disclosure of participant information without consent.

As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

## **Right to Deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill
  the terms of a written warranty or product recall conducted in accordance with
  federal law, provide a good or service requested by you, or reasonably anticipated
  within the context of our ongoing business relationship with you, or otherwise
  perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us:
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

#### **Children Under Thirteen**

VWW collects personally identifiable information on children under the age of thirteen provided by their respective parent or guardian during the registration process for the sole purposes of providing programming.

#### **E-mail Communications**

VWW may contact you via email for the purpose of communicating about the organization's mission, programs and services, upcoming events, and with invitations to donate. In order to improve our communications, we may receive a notification when you open an email from VWW or click on a link therein.

If you would like to stop receiving communications via email from VWW, you may opt out of such communications by emailing marketing@vtworksforwomen.org.

### **Changes to this Statement**

VWW reserves the right to make changes to this Privacy Policy at any time by posting the amended terms to the policy located on the home page. If we make material changes to this Privacy Policy, all amended terms shall automatically be effective 30 days after they are initially posted on the site. Your continued use of the website and/or Services available after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

#### **Contact Information**

VWW welcomes your questions or comments regarding this Privacy Policy. If you believe that VWW has not adhered to this Statement, please contact VWW at:

Vermont Works for Women 32 Malletts Bay Ave Ste A Winooski, Vermont 05404

Email Address: info@vtworksforwomen.org

Telephone number: 802-655-8900

Effective as of February 21, 2023