

## PRIVACY POLICY

Immigrant Law Center of Minnesota (“ILCM”) respects your privacy, and we assure you that we take the protection of your personal information very seriously. We therefore provide this Privacy Policy to disclose our information collection, utilization, and sharing practices for this Site. This Privacy Policy applies to any website or mobile application that includes, attaches, references, or links to this Privacy Policy (the “Site”). Unless explicitly provided herein, this Privacy Policy does not apply to the practices of entities that ILCM does not own or control or to people that ILCM does not employ or manage. If you do not agree to these terms, do not access the Site or other related services. The information we receive from you depends on what you do when you visit this Site. Except as described in this Privacy Policy, we do not sell, rent, share or disclose your personally identifiable information to or with any other organizations.

### TYPE AND USES OF INFORMATION WE COLLECT FROM YOU:

***Personally Identifiable Information (“PII”)*** – Generally, you can visit our Site without revealing any PII about yourself. At times, though, we may need information about you. Unless otherwise indicated, the information we request is optional. We may gather certain PII from you to help us better serve you and our mission through accepting donations, providing you information regarding volunteer opportunities, giving you options for contacting legislators regarding issues of importance to ILCM and the people it serves, to respond to your inquiries, and to provide you with newsletters and other ILCM services information. We only collect personally identifiable information when you choose to reveal it to us.

Our Site collects information from our web forms that may be displayed on our Site. At these places, we may ask you to give us contact information such as your name, address, telephone numbers, email address, company you work for, congressional district, and credit card information, including your credit card number, so that we and our vendors can process your information and donations.

When you email us, we receive your email address and any other information you choose to include in your email. If you use other web forms to submit inquiries or sign up for mailing lists or other information, we will collect the information you submit. If we receive similar questions from other users, we may post the most frequently asked questions on our site under a “Q & A” section. The question we post may be similar to, or the same as, the question you submitted, but we will not identify you (or anyone else) as the questioner.

The primary purpose of many web forms is to allow you to request information and make donations. We use the information you provide to fulfill your donation payment and otherwise provide the information you requested, as well as support related to your donations and information you requested.

We may use your PII to send you information, such as newsletters, event announcements, and donation solicitations, related to ILCM and its services. Our Site may include communication opt-out opportunities to allow donors to select not to have their name included in ILCM publications including the annual report. Emails from ILCM may also include opt-out

opportunities regarding ILCM communications. In addition, ILCM has adopted a Discontinue Contact Policy to protect individuals from continued contact by ILCM after they have indicated they no longer wish to receive contact from the organization. ILCM will use its best efforts to comply with your opt-out selections and its Discontinue Contact Policy.

We also reserve the right, but do not have the obligation, to contact you regarding changes to this Privacy Policy and other matters relevant to the Site.

#### INFORMATION AUTOMATICALLY COLLECTED:

When you visit our Site, we may collect some information automatically. This information is not linked to personally identifiable information. By collecting this information we get a better understanding of your needs and what services and Site materials we can develop to meet those needs. Some of the information we automatically collect is necessary for the proper functioning of the Site, such as cookies, as explained below. All the information we gather helps us understand your preferences and how well our Site is functioning so we can continually improve your online experience with us.

***Links, Embedded Content, and Buttons*** – We may keep track of how you interact with links across our services, including our email notifications. We do this to help improve our services, provide information and advertising, and to be able to analyze aggregate click statistics such as how many times a particular link was clicked on. This Site may contain links to other websites, content embedded in our Site that comes from or relates to other websites and services, and buttons from other websites and services such as social media websites like Facebook, Twitter, LinkedIn, and YouTube. Third parties may use cookies or other tracking devices to collect and track information about you across the Internet. We are not responsible for the privacy practices or the content of these other websites or their data collection practices. You should check the privacy policies of these other websites when providing personally identifiable information or to find out what other information they collect from users, whether while on their platform or website or in relation to links, buttons, or embedded media.

***Information From Your Computer*** – We may ourselves, or through our third party service providers, collect information about your computer, such as the browser, operating system, IP address, country and other geolocation data, date and time of visit, whether you are using a mobile device, referring websites, the search engine queries you used to get to our Site, the pages of our Site you visit and your activities on our Site such as what images, videos, or other imbedded media you view, as well as the amount of time spent on our pages, and the number of pages visited. Some of this information may be collected using cookies, as further explained below. This information is used for a variety of purposes to improve our Site and its content, including without limitation to gather broad demographic data, identify trends and statistics, help diagnose problems with our server, and to administer our Site and its content. We may collect and share information between pages of our Site for the proper functioning of our Site, as well as authentication. We may also use this information to provide you with information regarding our services, volunteer opportunities, and donations.

***Cookies*** - Our Site may use "cookies." Cookies are pieces of data that a website can send to your

browser, which may then be stored on your device. We may use both session and persistent cookies on our own or through our third party service providers as described below. Cookies may save your preferences while you are at our Site, such as allowing for persistent login on pages that require logging in, and we may use them to provide you with tailored information and tracking as you use our Site services and make donations. Cookies help us, among other things, to determine which areas of our Site are popular by tracking hits to those areas, which may in turn allow us or our third party providers to provide you with targeted information regarding our services and opportunities to help our organization. By modifying your browser preferences, you have the choice to accept cookies, to be notified when a cookie is sent, or to reject cookies. The rejection or limitation of cookies by your browser may limit your ability to use the Site.

**Web Beacons** - We may employ Web beacons (also called single-pixel gifs), which are customized links or similar technologies, on the Site and when sending you messages, newsletters, or emails or in using third party service providers. Web beacons allow us to (a) determine whether you have opened, or acted upon, an email and which links you have clicked on in order to deliver to you more focused communications and other content, (b) allow us to count the number of users who have visited certain webpages and effectively deliver services, and (c) enable us to compile aggregated statistics and determine the efficacy of communications by using Web beacons from third parties.

**Third-Party Service Providers** - We may use a variety of third-party services to help provide our services, to help us understand the use of our services, provide information, and allow you to make donations. Third party services providers may include, but are not limited to Google Analytics, HostGator, and TheDataBank. These third-party service providers may collect, store, and share information as further dictated by the privacy policies of those third parties.

Google, Inc. may utilize the data collected to track and examine the use of this Site, to prepare reports on its activities and share them with other Google, Inc. services. You may view Google's privacy policy here: <http://www.google.com/intl/en/policies/privacy/>, with more information located here: <http://www.google.com/policies/privacy/partners/> (including information regarding how to control how information is shared through your Ads Settings) and here: <https://support.google.com/analytics/answer/6004245?hl=en>. You may opt out of Google Analytics data as instructed here: <https://tools.google.com/dlpage/gaoptout/>.

Facebook similarly provides more information regarding the information it collects and how it is used in relation to advertising along with methods to opt out of collecting and sharing of information here: <https://www.facebook.com/settings?tab=ads>.

#### SHARING OF YOUR INFORMATION:

We will not sell, rent or lease your information to others without your consent, except as provided in this Privacy Policy. In general, the information you provide will be used to support your relationship with us, to enable you to make donations, and to enhance and improve our Site and services.

We may engage third party service providers, consultants, and independent contractors to perform functions and provide services for us including without limitation those third party service providers mentioned in this Privacy Policy. We may share the information we collect through our Site with these service providers so that they can perform services for us in relation to the Site and our entity.

For example, we may use TheDataBank to facilitate donation payment using your credit card and we may share information back and forth with TheDataBank to facilitate that donation. We may also share your information with third parties providing email and other communication services so that we may provide you with information regarding ILCM, its services, upcoming events, and opportunities to donate.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

In addition to the situations described above, we may use and disclose visitor information in special instances when we have reason to believe disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interfering with our rights or property, other Site visitors, or anyone else. We may disclose visitor information when subpoenaed, for government investigations, and when we otherwise believe in good faith that the law requires it.

#### OTHER INFORMATION PRACTICES:

***Access to Personal Information for Reviewing, Editing, and/or Removing*** - If you wish to discuss this Privacy Policy and the information we collect, you may contact us at the email address provided in this Privacy Policy. At this time we may not be able to specifically identify and provide you with information we have collected about you for your review, editing, or removal from our databases. Please refer to opt-out information located in emails or other communications sent to you for information regarding opting out of further communications from ILCM.

***Security*** - We take commercially reasonable steps to protect data, particularly financial information, transmitted through our Site including the use of Secure Sockets Layer (SSL) technology on the Site. We also require our credit card transaction processor to use adequate security and encryption technology to ensure the safety and security of your personally identifiable information. For example, TheDataBank uses https and encryption technology to safeguard your financial information. We cannot and do not ensure or warrant the security of any information you transmit to us or our vendors. You transmit information to us and our vendors at your own risk and should take all necessary precautions regarding the information you transmit, either to our Site or elsewhere on the Internet.

***Children*** - Protecting the privacy of children is very important to us. For that reason, our Site does not solicit, collect or maintain personally identifiable information from users we actually

know are under age 13. If you are a parent or guardian, please contact us if you believe information regarding a child has been collected by us through our Site.

***Business Transfers*** - In the event that we are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets or change in our ownership or control, your information may be sold or transferred as part of that transaction.

***Do Not Track*** - Presently the Site does not honor “do not track” settings on web browsers and does not offer you the opportunity to request that we not track your use of its services except as otherwise stated in this Privacy Policy.

***Changes to this Privacy Policy*** - We may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern our use of your information and will always be at [www.ilcm.org](http://www.ilcm.org). Please check this URL often for changes. By continuing to access or use the Site after those changes become effective, you agree to be bound by the revised Privacy Policy.

***Contacting Us*** - If you have additional questions about our use of information, please email us at [oficinalegal@ilcm.org](mailto:oficinalegal@ilcm.org) or phone us at 651-641-1011.

Effective Date: September 9, 2015.

© 2015 Immigrant Law Center of Minnesota, All Rights Reserved