

## **BoardSource is committed to protecting the privacy of all users of our online services**

### **PRIVACY POLICY**

Last Updated: May 23, 2018 – To see what has changed, click here.

BoardSource (either "we" or "us") is committed to protecting the privacy of our members and all users of our online services. This Privacy explains Policy how we collect, process and/or use information that we receive via our websites, emails we send, and mobile applications that link to this Policy, as amended from time to time. This Policy describes how we collect, process, use, share and secure the personal information you provide. It also describes your choices regarding use, access, and correction of your personal information. For purposes of this Policy, personal information shall mean any information relating to an identified or identifiable natural person.

If you have any questions about your rights as a user of this Site, you may contact [BoardSource](#).

**Deleted:** The following discloses our policy for gathering and disseminating information for this Web site located at [www.boardsource.org](http://www.boardsource.org) (the "Site").

Note: This privacy policy applies to the Site located at [www.boardsource.org](http://www.boardsource.org) and to our offline practices. This online privacy policy does not apply to the Websites of other companies, individuals, or organizations to which we may provide links. These Websites may have different policies relating to your privacy and information they collect about you, and you should consult the privacy policies of each site you visit.

Certain parts of this policy are applicable to members, while other parts apply to nonmembers. A member is a person or organization that (i) is current with payment of their membership dues and (ii) is in good standing. A nonmember is any other person or organization other than a member. For questions on whether you may be a member or a nonmember, please contact us at [members@boardsource.org](mailto:members@boardsource.org).

#### **A. Information We Collect**

The information we learn from customers helps us personalize and continually improve your experience.

We collect two types of information about you: personal information (such as, your name, address, telephone number, e-mail address, and credit card number), and non-personal, aggregate information (such as information regarding the pages you have visited and your IP address).

##### **1. Personally Identifiable Information**

The only personally identifying information that we collect and store about you is the information that you have chosen to provide to us. Because we change our offerings and

features from time to time, the options you have to provide us with personal information also may change, but here are some examples of situations in which you will have the opportunity to provide personal information to us:

- Creating an account;
- Signing up for emails, like our Resources + Solutions or The Spark! newsletter;
- Completing a form related to one of our products or services;
- Purchasing a product or service;
- Downloading resources, tools, or other materials;
- Contacting us for technical support or customer service.

Depending on how you interact with us, the personal information we collect from you may vary. For example, to create an account we may ask only for an email address and password. In other circumstances, such as when you purchase a product, we may ask you to provide other information, which may include your name, phone number, postal address and credit card number. If you enter credit card information on the Platform in connection with a purchase, that information is sent directly from your browser to the third-party service provider we use to manage credit card processing and we do not store it on our servers. The service provider is not permitted to use the information you provide except for the sole purpose of credit card processing on our behalf.

Personal information will only be used for the reasons outlined in this policy, and will be retained only as long as necessary to fulfill the stated purposes, or for a period specifically required by law or regulation and thereafter will be disposed of securely or made anonymous so that it cannot be identified to any individual.

## 2. Non-Personally Identifiable Information

We collect non-personally identifiable information about you in the following ways:

- Your Internet Protocol (IP) address or the proxy address of your Internet Service Provider (e.g. AOL, CompuServe, Comcast, etc.);
- The resource on our server accessed as a result of the request, such as the web page, image, etc.;
- The query in the request;
- The name and version of your web browser;
- The content of any sent or received cookie, as defined below;
- The Uniform Resource Locator ("URL") that was accessed before making the request for our web server;
- Other environmental variables, as described below.

This information is commonly collected by Websites. It is only used to help us make our site more useful for you. With this data we learn about the number of visitors to our Site and the types of technology our visitors use.

### a. Cookies

**Deleted:** For example, if you become a member of Boardsource.org, we will collect your name, address, E-mail address and other personal information so that we can process your requests. Further, if you make a purchase from the Site, we will collect your name, address, credit card number and other personal information in order to fulfill your order. We also may collect your personal information when you contact us via the Site.

Cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") are used by BoardSource. We use Cookies to remember users' settings as well as for authentication and analytics. A cookie is a small amount of data that is sent to your browser from a Web site's computers and stored on your computer's hard drive. It often includes an anonymous unique identifier. There are two types of cookies: non-persistent and persistent cookies.

**Deleted:** Some parts of this Web site may use a "cookie."

A non-persistent cookie enables a Web site to temporarily store information on your computer as you travel from one page to another. This cookie is automatically deleted from your machine when you close your browser.

A persistent cookie is kept even when you close your browser. You can manually delete these cookies using commands specific to your browser and computer system.

The BoardSource Web site uses non-persistent cookies to help track items put in your shopping cart and to allow a member to remain logged in as they move among Web pages.

BoardSource uses a persistent cookie if a member selects the "Remember me on this computer" option when logging in so that the member does not have to re-enter their User ID and password on subsequent Site visits. BoardSource also, on an anonymous basis, uses persistent cookies to help track the number of times a person visits the Site.

These technologies may be used in analyzing trends, administering the website, tracking users' movements around the websites and to gather demographic information about our user base as a whole. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service.

**Deleted:** The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Because cookies allow you to take advantage of some of the Site's essential features, we recommend that you leave them turned on. If you block or otherwise reject our cookies some of the Site features may not function properly.

#### b. Referrers, IP Addresses, Environmental Variables, and Device Information

We collect information through "referrers," IP addresses, and various environmental variables. Information we collect may include but is not limited to the domain from which you access the Internet, the time you accessed the website, the type of web browser and operating system or platform used, the Internet address or the website you left to visit the website, the pages you visit while at the BoardSource website and the Internet address of the website you then visit. We may collect IP address information in order to administer the website and to gather broad demographic information. We may also collect information about the device you use to access the website, including type of device, operating system, settings, and unique device identifiers, and IP address. Whether we collect some or all of this information often depends on what type of device you're using and its settings.

**Deleted:** A "referrer" is information the web browser passes along to the Boardsource.org web server that references the URL from which you came. An "IP Address" is a number used by computers on a network to identify your computer so that data can be transmitted to you. An "environmental variable"

#### c. Google Analytics Information

**Deleted:** This information is commonly collected by Web sites. It is only used to help us make our site more useful for you. With this data we learn about the number of visitors to our Site and the types of technology our visitors use. 

We also collect information through Google Analytics Advertising Features, including Demographics & Interests reports. Google Analytics is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of www.boardsource.org to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network.

We use this information to track age, gender, parental status, and interests of the visitors to our website to better understand our audience and customize our website to meet the needs of our audience.

You can opt out of the Google Analytics Advertising Features through Ad Settings ([read this page for more information](#)) or through [Google Analytics' browser opt-out option](#).

### 3. Aggregated Information

Aggregated Information refers to information we gather by compiling non-personally identifiable information to provide summaries of use of our website. We may use aggregated information to understand the interests of users as a group, but such aggregated information is not linked to individual users' personally identifying information. Given the non-personally identifiable nature of this information, there are no restrictions under this Privacy Policy upon our right to aggregate this information and we may share this aggregated information with third parties and use this information in any way.

## **B. How We Use Information**

We use the information we collect to provide our services. In order for us to best provide our services (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. So it is largely necessary for fulfilling the relationship we have with you, and, where that is not the case, we have a legitimate interest in using the information we collect, including personal information, for these purposes:

- to provide you with personalized content, services, and provide you with recommended resources or tools you may be interested in; we also use your IP address and mobile device for these purposes);
- to customize and improve the features, performance, and support of the site;
- to process your requests and save your contact information for future orders;
- for internal operations, including troubleshooting, data analysis, testing, research, and service improvement (this includes use of your IP address and mobile device information to help diagnose problems with our service and to administer the websites);
- to communicate with you or initiate communication with you through other means such as email, telephone (including mobile phone), or postal mail, including through the

use of contact information that you provide to us or (where it is lawful for us to do so) that we otherwise obtain from third-party resources;

- to analyze use of the website and improve the website;
- to create aggregate and statistical data that does not identify you individually and that we can commercialize (for example, we use mobile device data and IP addresses to gather demographic information);
- for other purposes that you separately authorize as you interact with BoardSource.

When we collect any information that does not identify you as a specific natural person ("Non-Personally Identifiable Information"), we are permitted to use and disclose this information for any purpose, notwithstanding anything to the contrary in this Policy, except where we are required to do otherwise by applicable law. If applicable law requires that we treat certain Non-Personally Identifiable Information as Personally Identifiable Information, we will use and disclose this information as Personally Identifiable Information in accordance with this policy.

### C. How We Share Your Information

We share customer information only as described below and only with third parties who follow practices at least as protective as those described in this Privacy Policy.

- We use affiliated and unaffiliated service providers all over the world (including web servers, cloud storage systems, CRM providers, email services, content support teams, and others) to help us deliver our service and run our business subject to strict confidentiality agreements. These companies are authorized to use your Personally Identifiable Information only as necessary to provide these services to us;
- We will disclose data if we believe in good faith such disclosure is necessary (1) to comply with relevant laws or to respond to subpoenas or warrants or legal process served on us; (2) to enforce our Privacy Policy; (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; (4) as we otherwise deem necessary and is permitted by applicable laws to protect and defend the rights or property of us, the users of our services, or third parties; or (5) as permitted under applicable laws to meet national security and similar requirements;
- We will otherwise share Personally Identifiable Information with your consent.

### D. User IDs and passwords

Members who have registered to access member-only content on the Site have unique user IDs and passwords. Users who register on the Site may use their E-mail address or other user name as their user ID and may choose their own passwords.

Passwords are the private property of registered users. Users should not share their passwords with third parties. For reasons of security and privacy, we will not give out passwords to

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#### **Deleted: Sharing Your Information with Third Parties**

##### **Deleted:** (a) Members

We may share our members' personally and non-personally identifiable information with third parties in order to fulfill a member request or otherwise complete a service.

In the unlikely event that all or substantially all of our assets are sold or transferred to another party, we may transfer the personally identifiable information of our members to the acquiring entity.

We also reserve the right to disclose the personal and non-personal information of our members if we reasonably believe we are required to do so by law; to protect our self or to protect the rights of another user; to reduce the risk of credit or other kind of fraud; or to comply with a court order.

We may also from time to time share the personal information of our members with third parties for research and development purposes.

We will not sell, rent or lend such personal information to any third parties, other than as specifically disclosed in this policy.

Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

##### **(b) Nonmembers**

We may share the personally identifiable information of our nonmembers with any affiliates, partners, agents, or other parties whose products and services may be of interest to you. If you are a nonmember and do not want us to share your information in this manner, please see the "CHOICE" section below.

We may also share our nonmembers' personally and non-personally identifiable information with third parties in order to fulfill a nonmember request or otherwise complete a service.

In the unlikely event that all or substantially all of our assets are sold or transferred to another party, we may transfer the personally identifiable information of our nonmembers to the acquiring entity.

We also reserve the right to disclose the personal and non-personal information of our nonmembers if we reasonably believe we are required to do so by law; to protect our self or to protect the rights of another user; to reduce the risk of credit or other kind of fraud; or to comply with a court order.

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anyone. If you forget your password, you can request that your account information be re-sent to the E-mail address you originally provided during registration.

#### **E. Third Party Links**

This website may contain links to other sites. Additionally, third party sites may from time to time link to the Site. PLEASE BE AWARE THAT WE ARE NOT RESPONSIBLE FOR THE CONTENT OR PRACTICES OF ANY OTHER SITES. We encourage our users to read the privacy statements of each and every website that they visit. Our privacy policy applies solely to the Site, located at [www.boardsource.org](http://www.boardsource.org).

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#### **F. Other Important Privacy Information**

If you are a resident of the European Economic Area, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by emailing us at [privacy@boardsource.org](mailto:privacy@boardsource.org).
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by emailing us at [privacy@boardsource.org](mailto:privacy@boardsource.org).
- You have the right to opt-out of communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the emails we send you. Registered users can manage their account settings and email marketing preferences as described in the "Choices Regarding Your Personal Information" section below. If you are an unregistered user, or to opt-out of other forms of marketing (such as postal marketing), you may email us at [privacy@boardsource.org](mailto:privacy@boardsource.org).
- Similarly, if we have collected and processed your Personally Identifiable Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personally Identifiable Information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personally Identifiable Information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

#### **G. Choice & Access to Personal Information Collected**

We provide you with the following choices regarding the use of your information:

- You may choose not to provide us with any personal information, but we may not be able to process your requests;
- You may set your browser not to accept cookies, or to warn you when a cookie is being placed on your computer. If you choose not to accept cookies, however, your ability to navigate this website may be hindered and you will not be able to use our online shopping cart.
- If you would like to unsubscribe to any of our services or would like us to remove you from any of our mailing lists, please E-mail [privacy@boardsource.org](mailto:privacy@boardsource.org);
- You may access the personal information we have collected about you and correct any inaccuracies. Please contact us by E-mail at [privacy@boardsource.org](mailto:privacy@boardsource.org) or by contacting us at the following address: Attn: Customer Relations, BoardSource, 750 9th Street NW, Suite 650, Washington, DC 20001-4590. Members who have registered online can also access and update their membership profile by [clicking here](#).
- Members may request that their information not be included in the member directory. If a member does not want to be included, please send an e-mail to [privacy@boardsource.org](mailto:privacy@boardsource.org).
- If you do not want us to share your information, please send an e-mail to [privacy@boardsource.org](mailto:privacy@boardsource.org).
- If you have concerns about the personal information collected or how it is used, please send an email to [privacy@boardsource.org](mailto:privacy@boardsource.org).

## H. Security

We make every effort to have reasonable security measures in place to protect the loss, misuse, or alteration of information under our control, including using Secure Sockets Layer (SSL) technology in our shopping cart to collect and transmit your information. We will transmit the entire credit card number to the appropriate credit card company during order processing.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to log out when finished using a shared computer. In addition, please do not email us your credit card number. We cannot guarantee the security of email, and we will not be liable if your email is obtained by a third party.

We have implemented security measures to protect users' personally identifiable information from loss, misuse, and alteration. We use security measures, such as encrypted storage and password protection systems, to safeguard the confidentiality of users' personally identifiable information. We reserve the right to change these security measures to accommodate new security technologies and methods. Although we have implemented security measures to protect a user's personally identifiable information, please be advised that no security measures are perfect or impenetrable and users assume the risk of any security breaches.

If you have any questions about the security of our website, please contact [privacy@boardsource.org](mailto:privacy@boardsource.org).

#### **I. How Long We Keep Your Personal Information**

We keep your personal information only so long as we need it to provide the Platform to you and fulfill the purposes described in this Policy. This is also the case for anyone that we share your personal information with and who carries out services on our behalf. Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements, we'll either remove it from our systems or depersonalize it so that we can't identify you.

#### **J. Notification of Changes**

If we decide to change our privacy policy, we will post those changes on our privacy policy page so you will always be aware of what information we collect, how we use it, and under what circumstances we disclose it. If at any point we decide to use personally identifiable information in a manner materially different from that stated at the time it was collected, we will notify you. You will then have a choice as to whether or not we may use your information in this manner. We will use information in accordance with the privacy policy under which the information was collected.

#### **K. Use of Website Content**

The information contained on BoardSource's website is provided for general informational purposes only. None of this information is intended or should be construed to be legal advice or a legal opinion. Although reasonable effort is made to ensure that the information contained on the website is as accurate as possible, omissions and errors may occur and the information may not reflect the most current developments. BoardSource expressly disclaims all liability to any person with respect to the consequences of any act or omission committed based upon reliance, in whole or in part, on any of the contents of the website.

#### **L. Contacting BoardSource**

If you have any questions about this privacy statement, the practices of BoardSource or its online service, or any other aspects of this Website, please contact [privacy@boardsource.org](mailto:privacy@boardsource.org) or call our Communications department between 9:00 a.m. and 5:00 p.m. Monday - Friday, Eastern Standard Time at 877-892-6273.

All information you provide in any written communication will also be covered by this policy.

#### **M. Special Policy Regarding Information from Children Under Thirteen**

We do not sell products or services to children under the age of 13, and we do not knowingly collect personally identifiable information from any child under the age of 13 without parental consent. When we receive such information, we delete it as soon as we discover it and do not use it or share it with third parties.

#### **N. Modifications**

We may revise this Policy from time to time by posting an updated version on the website. The revised Policy will be effective immediately for unregistered users and users registering accounts or otherwise acknowledging the Policy on or after the revision date. For other users who registered accounts before the revision date, it will also become effective immediately. However, they can object to the new Policy within thirty (30) days after the revision date. If we make a change that we believe materially reduces your rights or increases your responsibilities, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We may provide notice of changes in other circumstances as well. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Platform is subject to the most current effective version of this Policy.

**Deleted:** We may modify this privacy policy at any time by electronic notice posted on the Site. Your continued use of the Site after the date that such notices are posted will be deemed to be your agreement to the changed terms.