Stowe Land Trust Privacy Policy

1 Privacy & Confidentiality

To successfully carry out the mission of Stowe Land Trust (SLT), a great deal of data and many documents must be gathered and maintained. Data regarding the organization, people, their land, and philanthropic activity must be handled with respect and care. Due to the nature of SLT's work, all projects and gifts – whether under negotiation or completed – must be kept in strict confidence unless permission is obtained from the constituent to release such information. With regard to this policy, constituents are defined as all people who may consider or have supported SLT with cash or non-cash gifts or those individuals with whom SLT works.

2 Collection of data

When gathering data to complete SLT's work, SLT representatives will abide by the Association of Fundraising Professionals (AFP) Code of Ethical Principles and Standards of Professional Practice.

3 Recording & Maintenance of Data

SLT will record and present information in a careful and factual manner. Permanent files such as land project, financial, corporate and donor records will be maintained in accordance with SLT's Records Management Policy to assure document safety, confidentiality and easy retrieval.

4 Use & Distribution

Constituent information and corresponding documents are the property of SLT. Full access shall be granted only to the Executive Director and other SLT staff members that require the information in the performance of their duties. Limited access to constituent information shall only be extended to those others, such as contractors and current and emeriti SLT directors, who are directly involved with cultivation or solicitation efforts or otherwise require such access to perform their duties.

Information shall not be utilized for personal purposes or personal financial gain. Knowledge of unauthorized use of data will be reported to the Executive Director.

SLT's online fundraising database is protected by password restricted access.

Constituent data is used to send newsletters, event invitations, renewals, special appeals and other solicitations, e-newsletters and updates via postal mail and email.

SLT does not sell or share its mailing list and does not gather information on behalf of other organizations or individuals.

5 Security of Donor Information

SLT takes appropriate steps to protect the security of constituents' personal information. SLT will also protect personal information in storage. We have implemented financial and record management procedures to protect the personal data that SLT has under our control from: unauthorized access; improper use or disclosure; unauthorized modification; and unlawful destruction or accidental loss. All our employees, contractors, and volunteers who have access to, and are associated with processing of personal data, are obliged to respect the confidentiality of our constituents' personal data.

6 Online Data Collection & Security

SLT operates a website (<u>www.stowelandtrust.org</u>) for the purpose of providing information about its conservation, stewardship and other activities. The following are SLT's policies regarding the collection, use and disclosure of personal data when visitors use the SLT website and the choices they have associated with that data. By using the SLT website, visitors agree to the collection and use of information in accordance with this Privacy Policy

6.1 Information Collection and Use

SLT collects several different types of information for various purposes to provide and improve its work. While using the SLT website, visitors may be asked to provide certain personally identifiable information that can be used to contact or identify them such as their email and mailing address, phone number, and, cookies and usage data.

SLT may use visitors' personal data to contact them with newsletters, event invitations, renewals, special appeals and other solicitations, e-newsletters and other information that may be of interest. Constituents may opt out of receiving any, or all, of these communications from SLT by following the unsubscribe link or instructions provided in any email sent by SLT or by contacting SLT.

SLT may employ third party companies and individuals to manage the SLT website or provide websiterelated services. These third parties have access to visitors' personal data only to perform these tasks on SLT's behalf and are obligated not to disclose or use it for any other purpose.

SLT takes appropriate steps to ensure the confidentiality of visitors' data. SLT does not sell or share visitors' data with any other person.

SLT uses the collected data for various purposes, including the following:

- To provide information about SLT, its projects and its activities.
- To notify constituents about events and allow people to register for these events.
- To request support and allow people make donations to SLT.
- To gather feedback or valuable information so that SLT can improve the work SLT does.

6.2 Transfer of Data

Visitors' information may be transferred to - and maintained on - computers located outside of their state, province, country or other governmental jurisdiction where the data protection laws may differ from those of their jurisdiction. If visitors are located outside United States and choose to provide information to SLT, please note that SLT or employed third parties may transfer the data to the United States and process it there. Visitors' consent to this Privacy Policy followed by their submission of such information represents their agreement to that transfer.

6.3 Disclosure for Legal Reasons

Under certain circumstances, SLT may be required to disclose visitors' personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). SLT may also disclose visitors 'personal data if SLT believe in good faith that such disclosure is necessary or advisable to prevent certain legal liabilities.

6.4 Security of Data

The security of visitors' data is important to us but no method of transmission over the Internet or method of electronic storage is 100% secure. While SLT strives to use commercially acceptable means to protect visitors' personal data, SLT cannot guarantee its absolute security.

6.5 Google Analytics

SLT may use Google Analytics collect data for the purposes of tracking and monitoring the use of the SLT website. This data may be shared by Google with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. Visitors can opt-out of having made their activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <u>https://policies.google.com/privacy?hl=en</u>

6.6 Payments

SLT uses third-party services for payment card processing of online donations and other payments made through the SLT website. SLT does not store or collect vistors' payment card details. That information is provided directly to SLT's third-party payment processors whose use of visitors' personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. The payment processors SLT uses are:

- **Stripe** Their Privacy Policy can be viewed at <u>https://stripe.com/us/privacy</u>
- **PayPal / Braintree** Their Privacy Policy can be viewed at <u>https://www.paypal.com/webapps/mpp/ua/privacy-full</u>

6.7 Links to Other Sites

The SLT website may contain links to other sites that are not operated by SLT. If visitors click a third party link, they will be directed to that third party's site. We recommend visitors to review the Privacy Policy of every site they visit. SLT has no control over and assumes no responsibility for the content, privacy policies or practices of any third party sites or services.

7 Changes to This Privacy Policy

The Executive Committee and SLT Board must approve any changes to this policy. Relevant updates should be posted on SLT's website.

8 Contact Us

If anyone has any questions about this Privacy Policy, they may contact SLT at:

- By email: info@stowelandtrust.org
- By visiting this page on the SLT website: <u>https://www.stowelandtrust.org/contact-us/</u>
- By phone number: 802.253.7221
- By mail: PO Box 284, Stowe, VT 05672, United States