



We build strength, stability, self-reliance *and* shelter.

## PRIVACY POLICY

Otsego County Habitat for Humanity, Inc. (“Otsego County Habitat for Humanity” or “Otsego Habitat”) respects your privacy and preferences. As a general rule, Otsego Habitat does not collect Personally Identifiable Information (PII) about you when you visit our website, unless you choose to provide such information to us. This privacy policy (the “Privacy Policy”) sets forth the terms under which you share your personal data with Otsego Habitat, how Otsego County Habitat for Humanity collects and uses your data, and your rights concerning understanding and modifying how information will be collected and used.

Otsego Habitat is committed to maintaining the privacy of our website visitors and donors and upholds the confidentiality of your personal information. Otsego Habitat does not share, sell, rent, or trade information about its donors and other contacts. The personal information you provide is solely utilized to process and receipt your donation, to register your attendance at an event or meeting, or to respond to any of the information requests you may have.

### I. How does this Privacy Policy apply to you?

**Generally:** This Privacy Policy applies to the personal data provided to Otsego County Habitat for Humanity when you make a donation, register for an event, signup for a newsletter, purchase a product, or otherwise provide us with information via the Otsego Habitat website located at [www.otsegohabitat.org](http://www.otsegohabitat.org), or any other domain names owned or controlled by Otsego County Habitat for Humanity (the “Website”). It also applies to personal data you may provide to Otsego Habitat via telephone, email, regular mail, social media, texting, mobile applications, at a special event, in response to a solicitation or face-to-face.

**Minors:** It is Otsego Habitat’s policy not to solicit knowingly any personally identifiable information from children under the age of 18. Children under 18 are not authorized to make a donation or purchase, sign up for an event or program, or otherwise provide any personally identifiable information without consent from a parent or legal guardian.

### II. What about data you provide to other Habitat organizations?

**In the U.S. and Canada:** Each local Habitat organization in the United States and Canada (a “Habitat Affiliate” or “Affiliate”) is a separate legal entity, governed by an independent board of directors, executive committee or other governing bodies. Each Affiliate is solely responsible for its collection and use of your data.

### III. Why do we hold and process personal data?

Otsego Habitat may request from you, or you may volunteer to provide your contact information including your name, mailing address, phone number(s), social media handles and email address(es). We hold and process supporters' personal data for several reasons:

- To keep a record of donations made and actions taken by our supporters and our communications with them.
- To send our supporters marketing information about our projects, fundraising activities and appeals where we have their consent or are otherwise permitted to do so.
- To fulfill contractual obligations entered into with supporters.
- To support volunteers, such as during build or fundraising events.
- To support community-based fundraising and campaigning.
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted.
- Manage supporters' accounts and provide customer service.
- Offer sweepstakes, contests, giveaways or other promotions.
- Enforce the Website [Terms of Service](#).
- Perform other functions as described at the time Otsego Habitat collects information.

If you make a donation or a purchase with Otsego Habitat or otherwise provide us your information, Otsego Habitat may contact you from time to time about opportunities to make additional donations or purchases or to provide you information about upcoming programs.

See guidelines below for modifying your consent below, at “How to control what we send you or update your personal information”.

### IV. When will we send you personalized marketing communications?

Otsego County Habitat for Humanity will contact you for marketing purposes—for example, to keep you up to date on our work, or let you know how you can support that work—only where we have your consent or we are otherwise allowed to do so because of your prior engagement with Otsego Habitat, as explained further below (see “Our Reliance on Your Prior Support”).

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information. We will not send you marketing material if you tell us that you do not wish to receive it. Instructions for how to do so are below (see “How to control what we send you or update your personal information”).

**Duration:** Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Otsego Habitat will presume your consent to last for 24 months unless you withhold consent to this duration (see below, “How to control what we send you or update your personal information”). After this

time, in order for us to continue to update you, Otsego Habitat will seek your refreshed consent. You can update or withdraw your consent at any time.

Otsego Habitat will presume a longer period of consent in several exceptions:

- Where you have committed to making a regular (for example, monthly) donation. In this situation, and unless you withdraw your consent, we will treat consent as lasting until you cancel your donation, at which point your consent will expire 24 months after the last donation. This period allows Otsego Habitat to keep you up to date with the impact of your contributions, and to ask whether alternative support would be of interest.
- Where you have notified us that you will be leaving a legacy to Otsego Habitat.

**Our Reliance on Your Prior Support:** You may also receive marketing information from Otsego Habitat if you have previously made a similar donation to, or have previously purchased similar goods and services from, Otsego Habitat. However, we will not rely on your prior support as the basis for our continued marketing to you if you have opted out of receiving emails, newsletters, or other marketing materials in your communications to Otsego Habitat.

## V. How and when do we obtain information about you?

Otsego County Habitat for Humanity may obtain your personal data in the following circumstances:

### a. When you give it to Otsego County Habitat for Humanity

We will obtain your personal data directly when you make a donation, sign up for one of our events, purchase products from the Otsego Habitat online retail store, or when you communicate with us directly in some other way.

### b. When you give it to Otsego County Habitat for Humanity indirectly

We will obtain your personal data when you communicate to your employer or to a retail partner of Otsego Habitat during your point of purchase that you affirmatively designate Otsego Habitat to receive a personal contribution from you.

### c. When you access Otsego County Habitat for Humanity's sponsored social media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Instagram, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.whatsapp.com/legal/#privacy-policy>

<https://www.linkedin.com/legal/privacy-policy>

<https://help.instagram.com/402411646841720>

#### **d. When the information is publicly available**

We might also obtain personal data about individuals who may be interested in giving major gifts to charities or organizations like Otsego Habitat. In these cases, we may seek to find out more about these individuals' interests and motivations for giving through publicly available information. The information sources may include newspaper or other media coverage, open postings on social media sites such as LinkedIn, and services that aggregate data on charitable giving. Otsego Habitat will not retain publicly available data relating to major donors without their consent, which will be sought at the earliest practical opportunity.

#### **e. When we use cookies**

Cookies are a useful way for us to understand how supporters use Otsego County Habitat for Humanity's web site. When you visit our web site, we will use cookies to collect data from your computer or other devices, such as a smartphone or tablet. Cookies are created by your web browser when you visit our website. Every time you return to our website, your browser will send the cookie file back to the website's server. They improve your experience of using our website by, for example, preserving your preference settings so that you are shown information likely to be most relevant to you, and measuring your use of the website so that we may continuously improve it. Cookies can also be used to show you relevant Otsego Habitat content on social media services.

## **VI. What personal information might Otsego County Habitat for Humanity collect?**

Otsego County Habitat for Humanity will only collect personal data about you that is relevant to the type of transaction or project you have engaged in with us.

For example, we may receive and retain personal information about you when you contact Otsego Habitat to make a donation, purchase an item at The Habitat Store online, or sign up to any of Otsego Habitat's activities or online content (such as newsletters or message boards); or when you telephone, email, or write to us, or engage with us via social media channels. In each of these cases, the information we collect is relevant to the type of transaction you are entering into. Data such as your name, email, postal address, telephone or mobile number will be necessary both to execute these transactions as well as to enable us to contact you for further engagement. Bank account or credit card details will be necessary to process any donations. Age and travel restrictions will be relevant if you are signing up for an international build.

**Sensitive Personal Data:** We do not collect your "sensitive personal data" (e.g., health or dietary information) unless there is a clear reason for doing so—such as your participation in a sponsored physical event, and then only to the extent such data is required to ensure that we provide appropriate facilities, menu or support to enable you to participate in the event.

Should you support Otsego Habitat in a substantial way, we may provide an account manager to help tailor your relationship to us and the information you receive from us to suit your interests. If this is the case, we may collect sensitive personal data where relevant

to our relationship, such as your political or religious views. If you provide us with information about your health or your family, this may also be recorded so we can communicate with you in a considerate and appropriate manner.

All sensitive personal data is stored on a password-protected system to which only a limited number of relevant staff have access. It is deleted when no longer needed by us, is never shared with third parties, and is available to you at any point should you wish to see it.

## VII. How will Otsego County Habitat for Humanity use your personal data?

Otsego County Habitat for Humanity will use your personal information for the following purposes:

### a. For administrative reasons, including:

- “service administration”, which means that Otsego Habitat may contact you for reasons related to administering any donations you have made, the completion of commercial or other transactions you have entered into with us, or the activity or online content you have signed up for;
- to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used;
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to complete sales transactions you have entered into with us, for example at The Habitat ReStore;
- to implement any instructions you give us with regard to withdrawing consent to send marketing information;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries.

### b. For marketing and fundraising

Sections III and IV above describe what data may be used for marketing and fundraising purposes and under what circumstances.

### c. Analysis

To analyze and improve the activities and content offered by the Otsego Habitat website to provide you with the most user-friendly navigation experience. We may also use and disclose personal information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

## VIII. Will we share your information outside the Habitat network?

**Otsego County Habitat for Humanity's suppliers:** We may need to share your information with service providers who help deliver our projects and fundraising activities. These "data processors" will only act under our instruction and are subject to contractual obligations containing strict data protection clauses. We do not allow these organizations to use your data for their own purposes or disclose it to other third parties without our consent, and we will take all reasonable care to ensure that they keep your data secure.

**Facebook and other Social Media Sites:** We may also use your email address and phone number to match to your Facebook or other social media account in order to show you Otsego Habitat content while you use those services. We only do this where you have consented to receive marketing emails, either by opting in (where you reside in the European Economic Area) or by not opting out (where you reside in the United States and Canada). In addition, we may also use your email address and phone number to link to Facebook or other social media sites in order to identify other users of these sites whom we believe would be interested in Otsego Habitat.

There are two ways to prevent this use of your data. You can either update your consent preferences directly with us at Otsego Habitat (see below, "How to control what we send you or update your personal information") or via the social media sites:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Instagram: <https://help.instagram.com/196883487377501>

Updating your preferences with Otsego Habitat will not guarantee that you never see Otsego Habitat content on social media, since the social media site may select you based on other criteria.

**Where legally required:** We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

## IX. How long will Otsego County Habitat for Humanity keep your personal information?

We will hold your personal information on our systems only for as long as you continue to provide your consent. If you are a U.S. or Canadian resident, your ongoing consent is presumed unless you inform us that you wish to be removed from our contact list. (Instructions for doing this are set forth below, in Section X.) If you are not a U.S. or Canadian resident, your consent will be presumed to expire after 24 months, unless renewed consent is provided by you. Beyond that, we will hold your information only for as long as necessary to comply with our legal and regulatory obligations—such as, for example, to provide documentation on funding sources in connection with a review or audit of our compliance with U.S.C. Sec. 501(c)(3).

If you request that we stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyze the source of legacy income we receive.

## X. How to control what we send you and update your personal information

The accuracy of your information is important to us. We want to ensure that we are able to communicate with you in ways that you are happy, and to provide you with information that is of interest.

If you wish to change how we communicate with you or update the information we hold, then please contact us:

- To amend your contact preferences for any type of communication, email us at: [office@otsegohabitat.org](mailto:office@otsegohabitat.org) or write to us: Data Privacy Manager; Otsego Habitat | 526 Edelweiss Village Parkway | Gaylord, MI 49735 (to amend your preferences for any communication channel);
- To amend your contact preferences for newsletters contact us at: [office@otsegohabitat.org](mailto:office@otsegohabitat.org).

Additionally, you can opt out of marketing emails at any time by clicking the unsubscribe link in any marketing email from Otsego Habitat.

Timing of implementation. In responding to requests to not receive marketing information, we will make take all reasonable efforts to meet the following service levels:

- Email: 48 hours from receipt of email
- SMS: 48 hours from receipt of SMS
- Mail: 28 days from receipt of 'do not mail' request. This period is longer than for other channels due to the production times for mailing campaigns, and in most cases, we would expect the change to be effective much more quickly.

If you are a resident of the European Economic Area and your country has adopted the provisions of the General Data Protection Regulation, you have the right to request a copy of the personal information we hold about you, to have any inaccuracies corrected, and to have any personal information deleted from our systems (a “Subject Access Request” or “SAR”). Otsego Habitat aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. In line with standard guidelines for these requests, we will require you to prove your identity with two pieces of approved identification. We will respond to such requests within 30 days of receipt.

Please address SARs, or questions or complaints about this Privacy Policy, to the Data Privacy Manager, Otsego Habitat | 526 Edelweiss Village Parkway | Gaylord, MI 49735.

In addition, in certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Otsego Habitat relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data

## XI. How Otsego County Habitat for Humanity keeps your data safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms that ask for personal information are stored on networks that are password-protected and routinely monitored. Laptops are not used to store sensitive personal information unless they are both password protected or encrypted. All sensitive personal data is stored in a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer needed by us, is never shared with third parties, and is available to you at any point should you wish to see it.

Within Otsego Habitat, we undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff. Where we share your personal data with a Habitat National Organization, the National Organization is required to take comparable steps to assure that your information is securely stored and accessed only by appropriately trained personnel.

We use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and in our legal agreements, we clearly set out our requirements regarding how they manage the personal data to which they have access. We have a robust partner-monitoring framework to ensure these contractual obligations are met.

## XII. Changes to Otsego County Habitat for Humanity's Privacy Policy?

This Privacy Policy may be updated from time to time, so you may wish to check it each time you submit personal information to Otsego Habitat. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the Otsego Habitat website to submit personal information to Otsego Habitat. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on the website.

## Otsego County Habitat for Humanity Cookies Policy

How and why we use cookies: Cookies are used to enable us to improve our services by, for example:

- remembering if you are logged in so you can move around the website without having to log in again on each page (for example if you are in checkout);
- measuring how many people are using each page of the website and for how long so that we can try to improve the quality of our website;
- enabling you to view content shared on social media or sharing sites, such as YouTube or Twitter.

If you reside in the United States or Canada, cookies may also be used for “re-targeting” in advertising campaigns so that third-party vendors can display advertising to you about Otsego Habitat or other related entities as you use the internet.

How to manage and delete cookies. If you wish to restrict or block the cookies set by the Otsego Habitat website, you can do this through your computer or device’s browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies.

Please be aware that restricting cookies may affect the functionality of the Otsego Habitat website.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Otsego Habitat may still collect certain information from your browser, such as the IP address (which uniquely identifies a computer or other internet device).

**(Remove the text and table below before uploading to our website)**

This policy was approved by the BOD at their 8/22/2019 BOD meeting.

### 1. Change History

Date	Change #	Modification	Approved by