



Ohio Valley Region MG Privacy Policy

This Privacy Statement applies to all information collected through your communications with the Ohio Valley Region MG, whether electronic, written or oral; information collected through mobile applications (“Apps”) or Ohio Valley Region MG websites (“Sites”); as well as any other information about you that we may collect offline or receive from third-parties (collectively, social media tools, Apps, Sites, and offline or third-party information are referred to as the “Services”). By accessing our content and resources or providing your information to us, you accept and agree to the practices described in this Privacy Statement.

Because your privacy is important to us, we provide you with notices and choices about the collection and use of your information. To make these notices easy to find, links are provided from our homepage and donation webpages or other webpages that capture information about you. By visiting our Ohio Valley Region MG Website and/or creating a profile (each an “Ohio Valley Region MG Website”) or otherwise using our online resources, you are agreeing to comply with and be bound by these Terms of Use. If you do not agree to these Terms of Use, you may not access or use our online resources.

Here is how we handle information about your visit to our website or mobile app:

Information Collected and Stored Automatically

If you do nothing during your visit but browse through the website or mobile app, do searches, read pages, or download information, we will automatically gather and store certain information about your visit. This information does not identify you personally. No information about users/visitors will be sold, shared, or utilized in any commercial way. We automatically collect and store only the following information about your visit:

- The Internet domain (for example, “company.com” if you use a private Internet access account, or “yourschool.edu” if you connect from a university’s domain) and IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you access our website;
- the type of browser and operating system used to access our site;
- the date and time you access our site;
- the searches you make;
- the pages or screens you visit; and
- if you linked to this site from another web site, the address of that website.

We use this information to help us make our site and mobile app more useful to visitors – to learn about the number of visitors to our site, what part of the site they are interested in, how long they use the site, and the types of technology our visitors use. If you engage in more meaningful or intensive activities on the



website such as, for examples, downloading information or actively responding to events or “Subscribe Here,” then Ohio Valley Region MG may collect information that identifies you as an individual or information which is linked or linkable to you as an individual or household, which will collectively be referred to throughout this Privacy Statement as “Personal Information.” Personal Information may include but is not limited to contact information, demographic information, health and financial information, as well as call recordings and transcripts.

Sometimes we write a small file on the user’s computer called a “session cookie.” Session cookies automatically expire when users leave a website; session cookies retain information only during the session or for the purpose of completing a particular online transaction, without any capacity to track users over time and across different web sites. Please note that cookies could potentially be replicated by sophisticated technology groups, but there is some risk in all online applications or websites. But, our donation pages are completely secure and protected by an external processing gateway as you are transferred to our donation website, Zeffy. Other than a session cookie, and the six items described above, we do not obtain any information from the user or the user’s computer. We do not use “persistent cookies” and fully comply with the HHS IRM Policy for Usage of Persistent Cookies, HHS-IRM-2000-0009; this policy prohibits the use of persistent cookies and permits the use of session cookies.

We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/ and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

How We May Use Your Personal Information

Sensitive information that is stored, processed, or transmitted by Ohio Valley Region MG, or transmitted to Ohio Valley Region MG via the website donation form is protected by the controls in place. Each has also undergone accredited auditing pertinent to the security controls (SOC 2 Type II) and as part of Ohio Valley Region MG’s vendor risk management, have been reviewed to validate their components of the shared security model.

In transit encryption mechanisms include but are not limited to Transport Layer Security encrypted email within Google Platform and the use of TLS when accessing, interacting with, and transmitting data to the SaaS based platforms used by the organization for the storage of sensitive data. TLS/SSL based technologies are used in each of the systems including the website and all information transmitted through the website.



Ohio Valley Region MG's endpoints, Encryption at rest is encryption that is used to help protect data that is stored on a disk (including solid-state drives) or backup media. All data that is stored by Google is encrypted at the storage layer using the Advanced Encryption Standard (AES) algorithm, AES-256. We use a common cryptographic library, Tink, which includes our FIPS 140-2 validated module (named *BoringCrypto*) to implement encryption consistently across Google Cloud.

If You Send Us Personal Information

If you send us e-mail, or send a message via our "Contact Us box," or enter personal information on any form (such as registration, donation, or volunteer forms) found on our website, online community, or mobile app, your identity and the contents of your message will be stored in a secure external database system in perpetuity, and is covered by the Privacy Act. Be assured that:

- The information will not be shared with or sold to anyone not on the staff of the Ohio Valley Region MG unless permission to do so is granted by the constituent.
- Your e-mail address will not be provided to any third party unless permission to do so is granted by the constituent.
- Ohio Valley Region MG does not share, sell, trade, or rent your personal information with/to others.

We use this information to:

- Consider your suggestions.
- Possibly respond directly to you for clarification.
- Process your request for materials if you make one.
- Try and answer your questions if you ask them.
- Send you information regarding Ohio Valley Region MG.
- Solicit donations.
- Engage in legitimate marketing activity and promotions.
- Solicit opinions and perceptions through surveys or polls.

Data Collection, Utilization and Processing for Constituents Outside the United States

What is the General Data Protection Regulation?

The laws in some countries require us to tell you about the lawful grounds we rely on to collect, use, disclose, and otherwise process your Personal Information. To the extent those laws apply, our lawful bases for processing your Personal Information is in support of our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms. The GDPR is a comprehensive data privacy regulation enacted by the European Union (EU) to govern how companies obtain and process personal information in the EU. As a new and improved version of the 1995 Data Protection Directive, the GDPR strives to keep up with the growing demands for internet privacy in the world today. To



do this, the law extends its reach to include organizations outside the region, so long as they offer products/services to, or collect personal information from EU citizens.

Basically, the GDPR:

- Harmonizes data protection laws across all 28 EU member states into one centralized source,
- Reinforces individual privacy rights regarding the protection of personal data, and
- Imposes fines and other punishments on violators
- The GDPR's Definitions
- To comprehend and appropriately comply with the GDPR, you need to understand how the law defines its terms. Let's briefly go over the essentials.

Personal Data

Personal data is any information that can directly or indirectly distinguish a person. Although the law doesn't provide an exhaustive list of what should be considered personal data, here are the more obvious ones:

- Names
- Identification numbers
- IP/email addresses
- Web cookies
- Images or videos
- Bank details
- Anonymized data may also fall under this definition if a person can be easily identified from it.

Sensitive Personal Data

Under the GDPR, sensitive personal data is a unique class of personal information that comes with stricter regulations due to its intrusive nature. It includes but is not restricted to the following:

- Biometric data
- Genetic data
- Sexual orientation
- Political opinions
- Philosophical/Religious beliefs
- Racial/Ethnic data
- Processing

Processing is a delicate term under the GDPR. It refers to any activity or operation (whether electronic or manual) carried out on personal data. Cited examples include:



- Collecting data
- Recording data
- Storing or organizing data
- Modifying data
- Using data
- Disclosing data
- Restricting data
- Erasing data

With that said, just assume everything you do with a person's data can be labeled as processing.

Consent

We collect and process data under the lawful basis of consent, and our processing activities are considered legal only after getting clear, affirmative consent from our data subjects outside of the United States. This lawful basis promotes the GDPR mission to give more control to data subjects. Consent is now more deeply regulated under the GDPR. According to the law, consent must be clear, specific, unambiguous, and characterized by an approving action. We strive to obtain explicit consent from data subjects. Additionally, consent is easy to withdraw and given only by users over the age of 13 or else approved by a parent.

Individual Rights Under the GDPR

As an organization subject to the regulation, we observe and help exercise the individual user rights under the GDPR. They include:

- Right to be informed – We notify users about how we obtain and process their data in a brief, intelligible, and easily accessible form.
- Right of access – We allow users to obtain information about how we use, store, or disclose their data.
- Right of rectification – We let users correct inaccurate information displayed in our records.
- Right to erasure – We promptly delete users' data at their request.
- Right to restrict processing – We stop processing users' data at their request.
- Right to data portability – We allow users to transfer a copy of their data to another company.
- Right to object – In certain instances, users can object to the processing of their personal data.
- Rights related to automated decisions – We protect users from automated decisions by granting a review when requested.

If you would like to submit a data access, correction, restriction, or deletion request, you can do so by contacting us at amannerica@gmail.com and we will



process such request with respect to any Personal Information that we are able to link to you individually based on the information that you can provide to us. These rights and options that you have with respect to Personal Information are subject to limitations and exceptions under applicable law.

Our Commitment To Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, we adhere to the 1998 Children's Online Privacy Protection Act (COPPA). (For more information visit the Federal Trade Commission's COPPA site at <http://www.ftc.gov/privacy/coppafaqs.shtm>. The Ohio Valley Region MG web-pages are not directed at children but recognize children may, at times, utilize the service of the web-pages in sending personal information to the Ohio Valley Region MG Office. Whenever we receive such information or inquiries from those we actually know are under 13, we obtain parental consent before any personally identifiable information is collected, used or disclosed. Ohio Valley Region MG does not knowingly contact or solicit donations from individuals under 18 years of age. However, that may be occasionally unavoidable if an outside source gave us information but we did not collect or append age information to its lists.

Security

Online registration and information such as credit card numbers will be secured using a commercially accepted method of encryption. However, while we employ reasonable security measures to protect your personal information, please be aware that no method of electronic transmission is completely infallible, and we cannot guarantee its absolute safety. If you become aware of any breach of Site security, please contact us immediately.

We may disclose personally identifiable information to the proper authorities if we become subject to a subpoena or court order, or if we are otherwise legally required to disclose such information. We also may use and disclose information about you to establish or exercise our legal rights, to enforce the Terms and Conditions of Use, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person. If all or part of MGFA is merged or otherwise transferred to another entity, we may transfer the personally identifiable information you provided to us to such entity as part of that transaction.

Ohio Valley Region MG Donor, Visitor, or Mobile App User Confidentiality Policy

Ohio Valley Region MG recognizes that in order to efficiently operate, the organization requires the maintenance and management of extensive donor and prospect records. These records may contain sensitive information that has been shared with or developed by Ohio Valley Region MG Board of Directors or



volunteers on a confidential basis. (“Records,” as used herein, is construed to mean all files, including electronic data, containing information on donors or prospective donors to Ohio Valley Region MG) donors and prospects may be attracted to Ohio Valley Region MG on the basis of its ability to assure temporary or permanent anonymity. Protecting donor and visitor confidentiality is an essential part of providing good service and support to donors. Ohio Valley Region MG maintains the highest level of confidentiality with respect to donor and user information. Additionally, care is taken to preserve confidentiality of discussions that take place and information that is shared in the course of conducting Ohio Valley Region MG business.

This policy codifies the position of Ohio Valley Region MG on confidentiality.

1. Confidentiality of Records: The President shall have ultimate responsibility for maintaining the confidentiality of donor and prospect records, as well as fund information. Records will normally be available to the Executive Committee and only select volunteers as needed to fulfill their duties. At the discretion of the Executive Committee, volunteers may make all or part of any record available to the Ohio Valley Region MG Board of Directors and other related parties to assist them in executing their specific responsibilities. Ohio Valley Region MG auditors, legal counsel and other contractors are authorized to review donor/prospect and fund records as required for the purposes for which they are engaged. All persons accessing donor/prospect or fund records in the conduct of Ohio Valley Region MG business shall maintain the confidentiality of said records. This applies to agency endowment funds as well as to other types of funds. Board of Directors may share information with donors, fund beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc. Except in those instances, any copies of confidential information shall not be held outside Ohio Valley Region MG’s offices for extended periods, and are to be destroyed as soon as possible.

2. Publication of Donor Names: Ohio Valley Region MG gives donors the ability to opt out of printing their names in the Ohio Valley Region MG bi-annual report and in other appropriate listings. Ohio Valley Region MG will not publish the specific amount of any donor’s gift without the permission of the donor. Unless otherwise specified in the document, donors making gifts to Ohio Valley Region MG by bequest or other testamentary device are deemed to have granted such permission.

3. Memorial/Tribute Gifts: The names of donors of memorial or tribute gifts may be released to the honoree, next of kin, or appropriate member of the immediate family, unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.

4. Anonymous Gifts: The President or Treasurer is authorized to accept anonymous gifts to Ohio Valley Region MG, and to handle them appropriately. The name of the donor and size of the gift will be withheld from the Board of



Directors at the discretion of the President and the donor's discretion. All Board members will respect the anonymity of any such gift.

5. Giving Categories: If giving categories have been stipulated for a specific fund drive, challenge grant, or project, or as part of Ohio Valley Region MG's ongoing recognition program, then the donors, unless they otherwise specify, are deemed to have given permission for Ohio Valley Region MG to publish their names associated with the particular giving category. Similarly, Ohio Valley Region MG may publish giving categories associated with donor names in its annual report, and unless a donor specifies otherwise.

6. No Disclosures to Third Parties: Except as otherwise set forth herein, Ohio Valley Region MG shall not release to third parties or allow third parties to copy, inspect or otherwise use Ohio Valley Region MG records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including addresses and demographic information, shall be made without the donor's consent, except where required by law.

7. Confidentiality of Society Business: Discussions that take place in the context of Ohio Valley Region MG's operations require discretion, including discussions pertaining to grant-making, personnel issues, development activities, operational fundraising, investment management, etc. The positions or statements of individual board members, advisors, or volunteers should not be discussed outside of official Ohio Valley Region MG meetings and processes. Likewise, the content of Ohio Valley Region MG's business, including documents or Ohio Valley Region MG analyses of documents, should not be discussed or shared outside official meetings and processes.

8. Public Disclosure: Ohio Valley Region MG will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 Tax Return. This Confidentiality Policy shall not be construed in any manner to prevent Ohio Valley Region MG from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over Ohio Valley Region MG. However, all Board of Directors, volunteers, and contractors must hold strictly confidential all information of a private nature, including, but not limited to, all items explicitly discussed in this policy.

Social Media Interfaces. If you elect to engage with our social media tools like Facebook, Instagram, Twitter, or others, personal Information from your social media account may be shared with us, which may include personal information that is part of your profile or your friends' profiles; in addition, if you log-in to our website using your social media account, use a "like" button or use other social media features while visiting our website, those social media companies may collect information about you. Your interactions with social media companies and the use of their features are governed by their privacy policies.



Other Uses or Disclosures of Personal Information. We may also use and disclose your Personal Information as we believe to be necessary or appropriate: (a) to comply with applicable law, which may include laws outside your country of residence, to respond to requests from public and government authorities, which may include authorities outside your country of residence, to cooperate with law enforcement, or for other legal reasons; (b) to enforce our Terms of Use; (c) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (d) under circumstances we believe appropriate to coordinate treatment related services with your provider or health plan, or for permissible public health purposes such as cancer surveillance. In addition, Ohio Valley Region MG may use, disclose or transfer your information to a third-party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our organization (including in connection with any bankruptcy or similar proceedings).

In addition to the other uses described in this section, we may also use your information as you expressly authorize us to do so.

Do Not Track Disclosure. Some web browsers have a “Do Not Track” feature that lets a user notify websites that the user does not want to have his or her online activities tracked. Ohio Valley Region MG’s website currently does not respond to such browser-initiated signals. Regarding any potential external tracking, please consult external website policies regarding their tracking practices and their responses to Do Not Track signals.

In the Event of a Data Breach – Notify of Data Breaches

Under the GDPR, a personal data breach is defined as: “A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed” In the event a data breach occurs, Ohio Valley Region MG informs the proper supervising authority (the Ohio Valley Region MG and Executive Board of Director members) within seventy-two hours of discovering it.

We will also inform the concerned data subjects if the breach may threaten their rights and freedoms. Ohio Valley Region MG will distribute an email notice (and potentially a mail notice) to all impacted contacts. Our notice will contain the following information:

- The nature of the breach.
- The name and contact details of the DPO or similar information.
- The possible ramifications.
- The recommended steps to take in order to manage the breach.

The Ohio Valley Region MG will also work with proper law enforcement agencies and information technology agencies or entities to rectify or research the breach and will secure or delete data or records as needed or requested by contacts or legal entities.



Choice/Opt-Out

Access

Upon request, we will provide you with the information we maintain about you so that you may request corrections. This information will be sent via postal mail, which we believe is the most secure method of communication. Please contact us by email at amannerica@gmail.com or in writing at:

Ohio Valley Region MG
Security and Privacy Requests
3001 Meek Road
Goshen, OH 45122

To protect your privacy and security, we will take reasonable steps to verify your identity before providing information or making corrections.

Data Security

We are committed to protecting the security of your personal information and to honoring your choices for its intended use. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we strive to maintain physical, electronic, and administrative safeguards.

Our site provides users the opportunity to opt-out of receiving communications from Ohio Valley Region MG at the point where we request information about the visitor. The Ohio Valley Region MG allows the following options for removing your information from our databases. Anyone opting out will not receive future communications from us.

- Send an email to [**amannerica@gmail.com**](mailto:amannerica@gmail.com)
- On all email communications, constituents or contacts have the ability to “unsubscribe” from communications at the bottom footer of every email.
- Send mail to the following postal address to request to be taken off communications lists:

Ohio Valley Region MG
3001 Meek Road
Goshen, OH 45122

Links to Other Sites

Our web site has links to many other sites. Once you link to another site, you are subject to the privacy policy of the new site. This includes the sites that you may link to through our search engine.

Right to Change Privacy Policy.

Ohio Valley Region MG reserves the right at any time to modify, alter, or update this Privacy Policy. Your use of the website following any changes means that you agree to follow and be bound by the Privacy Policy as changed, subject to limitations under applicable law. Any change to this Privacy Policy shall be



effective as to any user who has visited the Site before the change was made. Please review this policy periodically, and especially before you provide any Personal Information to us. The Privacy Policy was last updated on the date indicated above.

Questions About Our Privacy and Confidentiality Policy?

If you have any questions about Ohio Valley Region MG's privacy policy, please feel free to contact us at:

Ohio Valley Region MG
3001 Meek Road
Goshen, OH 45122
Telephone: 513-767-6750
Email: amannerica@gmail.com