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PRIVACY NOTICE

Last updated December 3, 2020

Thank you for choosing to be part of our community at US Committee to Support the Campaign to End Child Prostitution in Asian Tourism, Inc., doing business as ECPAT-USA ("**ECPAT-USA**", "**we**", "**us**", "**our**"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regards to your personal information, please contact our data protection officer at info@ecpatusa.org.

When you visit our website <https://www.ecpatusa.org/> (the "**Website**"), and more generally, use any of our services (the "**Services**", which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as, any related services, sales, marketing or events.



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Overview

While our Website automatically collects certain information when you visit, we do not collect any personally identifiable information unless you provide it to us. We will only use and share your information to the extent necessary for our operation. If you do not wish your information to be shared outside our organization, wish to review or correct any information we collected about you, or if you would like to be removed from our mailing list, please contact us at info@ecpatusa.org.

You can find out more about what we do with the information we collect in this privacy notice below.

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16. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?



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1. WHAT INFORMATION DO WE COLLECT?

Information automatically collected

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website. Identifiable information will only be collected if you provide it to us.*

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Information collected through cookies and similar technologies

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Website, and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings, and information about your activity on the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event



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- information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other devices you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system, and system configuration information.
 - *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note, however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected when you provide it to us

We collect information such as your name, billing address, credit card number, debit card number, or other necessary information for completing the transaction when you shop on our website or make a donation through our website.

We collect your name and email address when you sign up for our mailing list or otherwise request information from us. We also maintain a list of donors in our database in order to be able to update you about our work and ensure that you know how your donations are being used. If you do not want to receive postal mail or emails from us in the future, please let us know by sending your request to info@ecpatusa.org.



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We will only collect sensitive data with your explicit consent. Sensitive data includes any information about racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation or data concerning criminal records. We will never collect any sensitive information unless we have your explicit and specific consent.

2. HOW DO WE COLLECT YOUR INFORMATION?

We collect most of this personal information directly from you—from your interaction with us via phone, email, or our website. However, we may also collect information:

- From cookies on our website: we use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.
- Google Analytics: we use Google Analytics to collect information when you visit our Website, you can see how Google uses information [here](#).

3. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:



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- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Website
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Website, products, marketing, and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end-users and does not include personal information. We will not use identifiable personal information without your consent.
- **To fulfill our legal obligations.** Federal tax law requires us to collect and report some information such as your name, address, and the amount of your contribution.

4. PROMOTIONAL COMMUNICATIONS

We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time by:



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- Contacting us at info@ecpatusa.org
- Using the unsubscribe link in emails

5. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations. We do not sell information to advertisers or spammers.

Who we share your information with:

- Service providers we use to help process donations and manage orders on our website, such as our payment service provider, Donorbox, whose privacy policy can be accessed [here](#); and Stripe, whose privacy policy can be accessed [here](#);
- Other third parties we use to help us run our business, such as our website host, Squarespace, whose privacy policy is available [here](#); and marketing and sales analyzing tool, Salesforce, whose privacy policy is available [here](#).

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court



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order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our organization is located in the United States. If you are accessing our Website from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in other countries.

If you are a resident in the European Economic Area, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.



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7. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.



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However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also enter into data processing agreements with our service providers to ensure they can only use your personal information to provide services to us and to you.

9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** You may review, change, or terminate your account at any time.*

If you are a resident in the European Economic Area or UK, you have the following rights under the GDPR:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Right not to be subject to automated decision making and profiling



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You can access a detailed explanation for these rights [here](#). If you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of



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charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website, you have the right to request removal of unwanted data that you publicly post on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

12. PROTECTION OF CHILDREN

We do not knowingly collect information from children. We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to provide us with their personal information without parent or guardian consent. If you are under 18, do not send any information to us about yourself, including your name, address, telephone numbers or email address, unless you have your parent's or guardian's permission. In the event we learn that we collected personal information from anyone under the age of 18, and do not have a parent or guardian's consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about anyone under the age of 18, please contact us at info@ecpatusa.org.



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13. LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

14. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@ecpatusa.org or by post to:

US Committee to Support the Campaign to End Child Prostitution in Asian Tourism, Inc.
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United States

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form [here](#). We will respond to your request within 30 days. Please note that we may require you to send us proof of your identity before providing you with access to your personal information.
