



## PRIVACY POLICY

This privacy policy will advise you about our guidelines concerning the use of your personal information, including the reasonable efforts we make to protect your personal information in accordance with these guidelines, and about what choices you have concerning our use of such information. Please read this notice carefully.

### 1.0 PRIVACY

We keep your private information private by

- **Not selling your information.** You have entrusted the National Council of Young Men's Christian Associations of the United States of America and its independent and autonomous member associations (collectively "The Y") with your personal information, and we're committed to using it wisely. The Y will not sell, share or otherwise transfer your personal information to anyone without your consent.
- **Restricting who has access to your information.** The Y takes reasonable precautions to restrict access to your Internet account and personal information only by employees who are authorized to have such access for business purposes. If you have any questions or concerns about our privacy policy, please contact Lindsay Austin-Hawley, Interim Director of Business Systems and Analytics, at [LAustin-Hawley@gbymca.org](mailto:LAustin-Hawley@gbymca.org) or 802-652-8165.

The Y may need to change this policy from time to time to address new issues and reflect changes on our websites or within YMCA branches. We will post material changes on our websites or otherwise notify you and update the "Last Date Updated" field in the "Revision History" at the bottom of this page so that you will always know our policies regarding what information we gather, how we might use that information, and whether we will disclose that information to anyone.

#### Scope of Privacy Policy

This policy applies to the personal information that you provide to The Y, either through our websites and mobile applications or in person at a YMCA branch or program site. This policy does not apply to your use of unaffiliated sites to which our websites link. This policy does not apply to Personal Health Information ("PHI") collected through the YMCA Diabetes Prevention Program or any other program offered by The Y that requires the collection of PHI or other HIPPA protected information.

#### Collection of Personally Identifiable Information

The Y collects personally identifiable information (PII) from you when you voluntarily submit such information to us. The collection of PII may occur in person or on a website or mobile application operated, provided or otherwise controlled by The Y. This information may include your name, home address, email address, telephone number, date of birth, demographic information, sex-offender status, membership status, emergency contact information, and other information that we may need to collect in connection with certain events, including but not limited to:

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Category: PRIVACY

**Contact(s):**

Lindsay Austin-Hawley  
Interim Director of  
Business Systems and  
Analytics  
Greater Burlington YMCA  
LAustin-Hawley  
@gbymca.org

- registration for, or participation in, events, classes, camps, and other activities or programs offered by The Y;
- participation in YMCA Nationwide Membership
- registration for surveys, forums, content submissions, chats, bulletin boards, discussion groups, requests for suggestions, or other services or activities offered on our website;
- answering your inquiries about our websites, organization, membership, or other services or activities;
- registration as a member of The Y;

### **Collection of Photographs**

The Y may also collect your photograph, by capturing your image at a YMCA or scanning your personal identification card, for the purpose of identifying you as a member, volunteer or program participant. When collected for this purpose, your photograph shall not be retained longer than three years from your last interaction with The Y. Your photograph will not be used for any marketing purpose without your authorization, with said authorization being acquired through a photo release.

### **Use and Disclosure of PII**

If you do provide us with PII, The Y may contact you based on the information you provide to communicate with you about YMCA activities that may be of interest to you and your family.

The Y will use its best efforts to never disclose any PII about you to any third-party for purposes unrelated to the YMCA without having received your permission except as provided for herein or otherwise as permitted or required under applicable law.

We do not rent or sell PII, including information provided about children, to third-parties. The Y may share PII with trusted service providers, such as payment processors, technology partners or other providers that need access to your information to provide operational or other support services while you are a YMCA member or program participant.

We may also provide PII to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the provision of such information is required or permitted by law, such as in connection with the investigation or assertion of legal defenses or for compliance matters.

### **Collection of Payment Transaction Information**

When you make a payment or donation, we collect information to process the financial transaction and may use that information to contact you in the future about The Y and its programs. Your payment information is transmitted to us, using a secure Internet method that helps maintain the privacy of this information. During the time your payment information resides on our computers, it is in an encrypted format and can only be accessed by authorized personnel with a decryption key.

### **Collection of Non-Personally Identifiable Information**

We collect non-personally identifiable information without limitation, through the use of the following types of methodology:

- **“Cookie” technology:** A cookie is an element of data that a website can send to your browser, which may then store it on your system to help enhance your experience in using our sites and to provide us with technical information about your usage.
- **IP address tracking:** An IP address is a number that is assigned to your computer when you are on the Internet. When you request pages from our Sites, our servers log your IP address.

- **Web beacons:** A web beacon, or “clear gif,” is a small graphic image on a webpage or web-based document that a website can use to determine information about a user.

Non-personally identifiable information might include the browser you use, the type of computer you use, technical information about your means of connection to our websites (such as the operating systems and the Internet service providers utilized), and other similar information. Our systems may also automatically gather information about the areas you visit and search terms you utilize on our websites and about the links you may select from within the sites to other areas of the World Wide Web or elsewhere online.

Although an industry-standard do-not-track (DNT) protocol has not yet been established, The Y’s information collection and disclosure practices and the choices it offers to consumers will continue to operate as described in this Policy.

### **Use of Non-Personally Identifiable Information**

We use non-personally identifiable information for our purposes related to running YMCAs and their programs, and, in particular, to administering websites, and, in the aggregate, to determine what technologies are being used. We may also share aggregate, non-personally identifiable information with third-parties.

### **Collection of Sensitive Information**

Where necessary, The Y may collect certain sensitive information from you, including

- payment card or bank account information to process fees or donations;
- health information in connection with various fitness programs, programs in which we are responsible for supervising children, health screenings, or other health service events that we may provide from time to time;

Access to sensitive information is restricted to those individuals who have a legitimate need for access. We will not use or disclose your information to third-parties unless such disclosure is necessary to accomplish the purpose for which the information is collected.

### **Privacy of Children**

We are mindful that young people need special safeguards and privacy protection. We realize that they may not understand or be able to meaningfully consent to the provisions of our policy or be able to make thoughtful decisions about the choices that are made available to our adult users. We strongly urge all parents or legal guardians to participate in their children’s exploration of the Internet and any online services and to teach their children about protecting their personal information while online.

To provide the services we offer, we sometimes need to collect certain information about children in both online and offline contexts. If we ask for PII from children under 13 in connection with our online services, where required we will comply with the Children’s Online Privacy Protection Act (COPPA), including taking additional steps to protect the privacy of such information, including

- obtaining verifiable consent from the parent or legal guardian of the child before collecting or using the child’s PII;
- notifying parents about what PII is being requested and how that PII will be used and/or shared, such as through this policy;
- limiting the online collection of PII from children to no more than is reasonably necessary to accomplish the purpose of the collection;

- giving parents a description of and access to the PII we have collected from their children;
- offering them the opportunity to request that such PII be changed or deleted;
- offering them an opportunity to prevent any further use or collection of information about their children; and
- maintaining reasonable procedures to ensure the confidentiality, security and integrity of the personal information collected.

We may also need to collect certain information about children and minors in an offline context, such as when

- a parent or legal guardian of a minor signs up for a membership including the child at a local YMCA, or for a program or camp we offer at one of our locations; and
- minors visit our facilities without a membership, where we may collect information about them to be able to contact their parent or legal guardian to notify them of an injury or other issues involving the minor.

### **Links to Other Sites**

Users may find other content on our websites that link to the sites and services of other third-parties. We do not control the content or links appearing on these sites. Third-party sites or services, including their content and links, may be constantly changing and may have their own privacy policies and customer service policies. We encourage you to review the privacy policies of any third-party sites or services before providing any of them with your personal information.

### **Choice/Opt-Out**

If you opt-in to receive information from us, you can change your mind later. If at any time you would like to stop receiving such information or opt out of a feature, you may change your options by contacting Lindsay Austin-Hawley, Interim Director of Business Systems and Analytics, at LAustin-Hawley@gbymca.org or 802-652-8165. You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will make reasonable efforts to do so upon your request, and we are unable to have your information removed from the records of any third-party who has been provided with your information in accordance with this policy.

### **Personal Data Access and Accuracy**

You may contact The Y with inquiries or complaints regarding the use of information about you. We will use reasonable efforts to grant reasonable requests to access data about the requester. We will also make reasonable requests to correct any incorrect or misleading data about the requester.

## **2.0 SECURITY**

YMCAs take appropriate administrative, technical, and physical measures to safeguard against unauthorized processing of personal information, and against the accidental loss of, or damage to, personal data. However, The Y cannot provide an absolute guarantee of the security of any of our websites or any other site on the Internet.

### **Consent to Transfer**

YMCA websites are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to The Y will be transferred to the United States. By using YMCA websites, participating in any YMCA services, and/or providing us with your information, you consent to this transfer.

**California Privacy Rights**

The California "Shine the Light" law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third-parties for direct-marketing purposes in the preceding calendar year. The Y does not distribute your personal information to outside parties for their direct marketing without your consent.

**Updating your Personal Information**

You can update your personal information by emailing us at [LAustin-Hawley@gbymca.org](mailto:LAustin-Hawley@gbymca.org) or via a written request mailed to: Lindsay Austin-Hawley, Interim Director of Business Systems and Analytics, 298 College Street, Burlington, VT 05401. Please do not send Social Security numbers or other sensitive information to us via unencrypted email.