

DRAFT Data Privacy Policy

This policy describes our current policy but it is draft status because it has not been approved by our board of directors. This approval is expected June 2019.

Privacy Notice

This privacy notice discloses the privacy practices for the Keystone Policy Center. It will notify you of the following:

- What personally identifiable information is collected from you through our website or any other means, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.

Information Collection, Use, and Sharing

We are the sole owners of the information collected on our website or any other means. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to ship an order.

Unless you ask us not to, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

Links

Our website may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Security

We take precautions to protect your information. When you submit sensitive information via our website or any other means, your information is protected both online and offline.

Wherever we collect sensitive information (we do not collect credit card data but we use PCI Compliant practices for credit card processing with select vendors), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of our website or any service we refer you to where you might submit sensitive information.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The

computers/servers in which we store personally identifiable information are kept in a secure environment.

If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at 970-513-5800 or via email at info@keystone.org.

E-Mail Lists Subscriptions and Memberships

You may use our website – via a sign-up form – to subscribe to our general e-mail newsletter list to which we mail about 3-6 times per year. From time-to-time our work demands we create and mail to e-mail lists for working groups, stakeholder groups and similar purposes. During registration a user may be required to give certain information (such as name and email address). This information is used to contact you about our work in which you have expressed interest. At your option, you may also provide demographic information (such as gender or age) about yourself, but it is not required. You may unsubscribe from any list at any time and we make every effort to make doing so as easy as possible. You may also inquire what information we have about you as a result of any mail list subscription.

Surveys

From time-to-time our work demands we make requests information via surveys. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as name and shipping address), and demographic information (such as zip code, age level). Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site.

Sharing Your Information

Keystone does not share your information with any parties except for data processing purposes using third parties as described below.

GDPR Compliance

Keystone Policy Center takes every possible effort to comply with the European [General Data Protection Regulation](#) (GDPR) because we acquire some customer data including Personally Identifiable Information (PII) from people in Europe; because this standard is more rigorous but not significantly more onerous than existing standards in the United States; because Keystone believes this is a good standard which respects privacy of PII; and because compliance with this standard is both a decent courtesy and can protect Keystone in case of any future litigation.

As a summary, the GDPR requires that an organization:

- Receives consent from an individual to handle his or her personal data
- Will notify individuals of any data breach that affects his or her personal data
- Allows an individual access to a copy of his or her personal data
- Allows an individual to request deletion of his or her personal data
- Adhere to specified standards to comply with all of the above conditions.

Keystone will retain PII only for the amount of time it is required in order to fulfill its contractual obligations with the exception of donor data which is stored in Salesforce Customer Relationship

Management System and will not be deleted unless deletion is requested by the individual to whom it pertains.

The scope of this policy includes data gathered and/or stored or processed in the following locations and services, which is an complete list of third-party data processors used by Keystone and all of which have acceptable privacy policies and/or comply with the GDPR:

- Keystone Policy Center website (<https://keystone.org>) – used only to direct interested user to a MailChimp form to sign up for Mail Lists.
- MailChimp – Mail lists for Keystone marketing and project work
- Salesforce – donor information
- GSuite by Google – Mail lists for project work
- Tito Event Management – event management for project work
- SurveyMonkey – polling and event management for project work
- Keystone File Server – Microsoft-hosted, SSAE 16 compliant, secure server holds some PII for project work
- Other (specify and keep updated)