

Communications & Privacy Policy

Communications & Privacy Policy for Old Boys Alumni Association of SJNA (OBAA)

This Communications & Privacy Policy applies to all users of our web sites, mobile applications (including tablet applications), and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals through written or oral means, such as email or phone.

We respect your privacy and work hard to safeguard the privacy of Customer Data that we have received.

This Privacy Policy does not apply to information collected or received through other means, use and sharing of anonymous or de-identified data, or information collected by third party websites, such as Facebook, Twitter (X), Pinterest, Instagram, Snapchat, and Google+, that we do not own or control, even if you access them through our services. You should carefully review the privacy policies of any third party services you access so that you know how they will collect, use, and share your information.

Definitions:

- “Customer” means a customer of ours that uses our Services.
- “Customer Data” means Customer Data/information, reports, addresses, and other files, folders or documents (any information relating to an identified or identifiable

natural person) in electronic form that we receive and store for purposes of providing the Services.

- “Services” means the services we use, including **obaasjn.org**, **givingfuel.com**.
- “User” means an employee, agent, or representative of ours, who primarily uses the restricted areas of the Site for the purpose of accessing the Service in such capacity.
- “Visitor” means an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

1. We Collect Personally Identifiable Information

We utilize the Services to collect payment details and visitor information from our customers and participants. In order to process online payments and provide service to customers, we ask for personally identifiable information (such as your name, address, city, state/province, zip/postal code) in order to complete the transaction, registration, payment or newsletters. We retain personally-identifiable information in accordance with our requirements. We do not

share any information with unaffiliated companies or organizations. Because data submitted to us is a critical part of our business, it would be treated like our other assets in the context of a merger, sale or other corporate reorganization or legal proceeding.

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2. We Are A Data Controller

We own, control or direct the use of any of the Customer Data stored or processed via the Services. We and our Customers are entitled to access, retrieve and direct the use of such Customer Data. We access such Customer Data only as necessary to provide Services to our Customers. We are acting in the capacity of data controller in terms of the European Union's General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter "GDPR") and do have the associated responsibilities under the GDPR. We do not cause Customer Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on our behalf in connection with our provision of Services to Customers. We are the data controller under the Regulation for any Customer Data, meaning that we control how Customer Data is collected and used as well as determine the purposes and means of the processing of such Customer Data.

If you are a Customer or Visitor and, after reading this policy, have questions about how we manage data to comply with applicable privacy requirements, contact us at **info@obaasjn.org**.

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3. How We Collect Information

We collect different types of information from or through the Services. The legal bases for our processing of Customer Data are primarily that the processing is necessary for providing the Services and that the processing is carried out in our legitimate interests, which are further explained in the section "How We Use the Information We Collect" of this Policy. We may also process data upon your consent, asking for it as appropriate.

We collect information principally online upon signup of Customers, the filling out of any registration forms, or submission of payment information. For example, when you order a product, take a survey, make a donation, participate in a contest, or other promotion, we capture this information. A Customer's name, address (postal and email) and telephone number are usually asked for in these cases. But we might request other information, based on the services. We do not share, make data or personally identifiable information of participants of Customers available to any third party for any reason, except for those reasons stated in this policy.

“Automatically Collected” Information

When a Customer or Visitor engages the Service, we may automatically record certain information from the Customer’s or Visitor’s device by using various types of technology, including cookies, “clear gifs” or “web beacons.” This “automatically collected” information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content the Customer or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these technologies to collect information regarding a Customer’s or Visitor’s interaction with email messages, such as whether the Customer or Visitor opens, clicks on, or forwards a message, or when a Customer receives and interacts with a text message sent by us to a Customer. This information is gathered from all Customers and Visitors and is never sold or shared.

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4. How We Use (and Don’t Use) Personal Information

A. On the Customer’s behalf

We use the personally-identifiable information we collect online and through text messages principally to provide Customers and Visitors with the service(s) of registering for an event online, making an online donation, subscribing to a newsletter or otherwise registering for an online form. Postal and email address information, for example, enables communication about services/items offered and ordered, as well as the proper provisioning and billing of those services (email sales receipts, for example).

More specifically, we may utilize text messages for updates, changes or important announcements about an event or organization; for reminders about event details (e.g., start times); delivery of confirmation numbers, confirmation pages, QR codes, tickets, etc.; replies to customer inquiries regarding directions, ticketing page links, contact information, or other event information; 2 way communication between an event organizer and its attendee/our subscriber about event information; or special announcements, news, promotions, deals, or other marketing messages.

We may involve other companies or vendors to carry out certain functions in marketing and delivering services to you (such as processing data files and sending the Customer or Visitor new order fulfillment information), and so may share data with those vendors to the extent necessary for them to perform their work. Of course, such partners and vendors must use that personally-identifiable information only for the purpose(s) for which it was shared and protect it from any further use.

We will not collect, process, sell, share, or use any Customer Data made available to us for any purposes other than for the performance of the Services. We may, at times, collect or process any Customer Data with the purpose of inferring characteristics about a consumer. We may, at times combine personal information received from Customer with any personal information received from other sources, or engage in any targeted advertising based on a Customer's, Visitor's or consumer's activity across different online services.

B. Legal

We also reserve the right to access, read, preserve, and disclose/provide personally identifiable online information in response to subpoenas and other legal demands, and where we believe that disclosing this information is necessary to identify, contact or bring legal action against individuals who may be endangering public safety or interfering with our property or services, or with others' use of them.

C. Communications

We may use email addresses and telephone numbers of Customers and Visitors who signed up online to send an email or text message related to our products and if affirmatively indicated a desire to receive additional information. If at any time, a Customer, Visitor or other consumer would prefer not to receive further email communications, or text messages, at their email address or phone number, please contact Customer Support through the number or email address listed below. We will timely respond to all opt-out requests.

D. Operations

We use Customer Data, Visitor data, and other consumer information to operate, maintain, enhance and provide all features of the Services; to provide the services and information that Customers request, to respond to comments and questions and to provide support to users of the Services. We process Customer Data solely in accordance with the directions provided by the applicable Customer. We also use the information provided for internal research, to verify information if necessary, prevent fraud, and enhance security, and to audit and provide reporting relating to transactions and interactions, including online transactions/interactions you may have had with us, or others on our behalf. We may share information as part of a merger, acquisition, or other sale or transfer of all or part of our assets or with other entities as you have authorized or requested. Where applicable, we have contractual agreements in place, such as with our partners, to ensure that they provide the same or equal protection of your information as stated in this Privacy Policy.

E. Improvements

We use the information to understand and analyze the usage trends and preferences of our Customers, Visitors and Users, to improve the Services.

F. How Long We Keep Information

We keep information only as long as reasonably necessary to achieve the goals and purposes stated in this Privacy Policy, or as long as we are legally required to retain it.

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5. Your Choices

Access, Correction, Deletion, Copies

We respect your privacy rights and provide you with reasonable access to the Customer Data that you may have provided through your use of the Services. If you wish to access or amend any other Customer Data we hold about you, or to request that we delete or transfer any information about you that we have obtained, you may contact us as set forth in the “How to Contact Us” section. At your request, we will have any reference to you deleted or blocked in our database.

You may update, correct, or delete your Account information and preferences at any time by contacting us with your requests at this email address **info@obaasjn.org**. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, defense of our company in litigation, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Customer Data with us, in which case we may not be able to provide you with some of the features and functionality of the Service.

At any time, you may object to the processing of your Customer Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact us. You also have a right to lodge a complaint with data protection authorities.

If you want us to not to collect cookies, you may be able to set your web browser to reject cookies entirely or require that it request permission from you before accepting each new cookie. You can also delete cookies from your web browser once you leave a website.

If you do not want Google Analytics to collect and use information about your use of our Services, then you can **install an opt-out** in your web browser. You also may opt out from Google Analytics for Display Advertising or the Google Display Network by using Google’s Ads Settings located at **<https://www.google.com/settings/ads>**.

If you choose to limit collection of your information in these ways, certain features of our Services may not function properly, or at all, and certain Services may not be available to you.

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6. Navigation Information

You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the [Google Analytics Opt-out feature](#).

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7. Our Text Messaging & Opting out of Text Messaging

Old Boys Alumni Association of SJNA maintains the webpages on obaasjn.org and givingfuel.com.

By checking the optin box during your registration on a page you are confirming a subscription and expressly consented to receive SMS alerts and notifications on your mobile telecommunications device from us for purposes of providing you updates. You acknowledge, understand and agree that we shall not be held liable for any delays in the receipt of our text message to you, as its delivery is subject to effective transmission from your mobile service provider.

There may be some costs associated with the use of this service. Message and data rates may apply. For example, your mobile telecommunications service provider may charge you to receive SMS messages. We will not be held responsible for any charges related to the use of this service.

To stop receiving text messages, text STOP. You will receive one (1) final message from us confirming that you have been inactivated in our system. Following such confirmation message, no additional text messages will be sent unless you re-activate your subscription.

For help or to receive additional information reply HELP or contact info@obaasjn.org [\(top\)](#)

8. Our Additional Communications & Opting out of Communications.

We will not use the information we receive from our customers to make, or allow any third parties to make, telemarketing calls to our customers, or the use of automatic telephone dialing systems and artificial or prerecorded voice messages to contact our customers.

However, customers who complete a registration on our page agree by their electronic signature to the terms of this Policy, and further agree by affirmatively checking a box to be contacted by us at their phone number, dialed manually and by email. In other words, our customers have to affirmatively opt-in.

Further, to comply with the law, we commit to always do the following: get customer consent for any marketing or non-marketing communications; maintain records of customer consents (and separately maintain backups of those consents); offer opt-outs as noted in this policy; we do not have auto-dialing or re-dialing of our Customers; we always honor customer requests to stop any calls or texts; we only communicate during business hours, or during the hours immediately before an event, and during an event; and we include our company's name in all messages so you know messages are from us.

Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten (10) business days for us to process your request. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

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9. Third-Party Services

The Services may contain features or links to web sites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Services. We are not responsible for the

content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Services. We encourage you to learn about third parties' privacy and security policies before providing them with information.

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10. California Specific Terms

If you are a California resident, please review these additional privacy terms, which provide a summary of how we collect, use, disclose, and sell personal information about you and explain your rights under the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA").

Personal Information We May Collect, Use, and Disclose for Business Purposes. We may collect from our Customers the following categories of personal information, as described in greater detail above:

- Identifiers, such as name, email address, mailing address, phone number, or IP address
- Commercial information, such as records of purchases and payment information
- Internet or other electronic network activity information, such as log data, and information about the devices and computers you use to access Our Services
- Geolocation data, such as GPS signals, device sensors, and Wi-Fi access points, where you have allowed access to that information
- Electronic, visual, or similar information, such as photos
- Professional or employment-related information, if you apply to work for us
- Education information, if you apply to work for us
- Other information you provide, such as demographic information, responses to surveys or messages to customer service
- Reasonable inferences or conclusions drawn from any of the above, including about the content or ads that may be of interest to you

Categories of Sources Used to Collect Personal Information. As a result of your use of our Services, we may collect this information from you (such as when you register for an event or purchase products), from third parties, or automatically (such as from your devices, if applicable).

For more information on the information we collect and uses, please see above.

We Don't Sell or Share Personal Information.

In the last 12 months, we have not knowingly sold any Personal Information of California Consumers, and we have no actual knowledge that we have sold the Personal Information of California Consumers under the age of 16 years old.

The categories of personal information shared (as defined by the CCPA) include:

- Identifiers, such as name, email address, mailing address, phone number, or IP address
- Internet or other electronic network activity information, such as log data, and information about the devices and computers you use to access Our Services
- Geolocation data, such as GPS signals, device sensors, and Wi-Fi access points, where you have allowed access to that information

Disclosure of Personal Information for a Business Purpose

The categories of Personal Information that we may disclose, as well as who information is disclosed to, and how it is used, are listed above.

Sensitive Personal Information

The CCPA provides you additional rights with respect to sensitive personal information (which includes, social security, driver's license, state identification card, or passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership, genetic data, biometric data, personal information collected and analyzed concerning a consumer's health, and personal information collected and analyzed concerning a consumer's sex life or sexual orientation).

We do not use sensitive personal information for purposes of inferring characteristics about a consumer.

Your Rights. Under the CCPA and the CPRA, California residents have certain rights related to their personal information.

The Right to Know. You may request that we disclose to you the categories of personal information we have collected, used, disclosed, or "sold" within the meaning of the CCPA, including:

- Specific pieces of information that we have collected about you
- Categories of personal information we have collected about you
- Categories of sources from which the personal information is collected
- Categories of personal information about you that we have sold, shared, or disclosed for a business purpose
- Categories of third parties to whom the personal information was sold, shared or disclosed for a business purpose
- The business or commercial purpose for collecting, selling, or sharing personal information (collectively, the "Right to Know")

The Right to Delete. You have the right to request that we delete personal information about you that we have collected from our Clients concerning you.

The Right to Correct. You have the right to request that we correct any incorrect personal information that we collect from our Clients, or retain about you, subject to certain exceptions.

Verification. In order to exercise these rights, you will need to verify your identity to protect your security and personal information, which may include providing certain information. Note that even if we honor your request to delete your information, we may retain certain information as required or permitted by law.

Authorized Agent. You may elect to have an agent exercise your rights for you. Even if you choose to use an agent, we may, as permitted by law, require:

- The authorized agent to provide proof that the consumer gave the authorized agent signed permission to submit the request;
- The consumer to verify their identity directly with the business;
- The consumer to directly confirm with us that they provided the authorized agent permission to submit the request.

Non-Discrimination. We do not discriminate against you because of your exercise of any of your privacy rights, or any other rights under the CCPA, including by:

- Denying you goods or services
 - Denying you access to our website, events etc
 - Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties
 - Providing you a different level or quality of goods or services
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

Request for Notice. If you're a resident of California, you can request a notice identifying the categories of personal information, as defined by California Civil Code Section 1798.83, we share with our affiliates and/or third parties and the contact information for such affiliates and/or third parties. Please submit a written request to info@obaasjn.org.

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11. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

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12. How to Contact Us

Please contact us with any questions or comments about this Policy, your Customer Data, our use and disclosure practices, or your consent choices by email at info@obaasjn.org.

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Updated: September 10, 2021