# PRIVACY POLICY FOR ADRIAN BRINKERHOFF FOUNDATION

This is the Privacy Policy for the Adrian Brinkerhoff Foundation (“ABF” “or “we” or “us”). ABF has prepared this privacy statement to inform you with respect to how we collect, use, disclose and safeguard your personal data.

This Privacy Policy describes the privacy practices of ABF for the data we collect through various channels, such as:

* When you use websites operated by us (the “Websites”).
* When we e-mail you HTML formatted communications. Collectively, we refer to the Websites as “Services.”

By using the Services, you agree to the terms and conditions of this Privacy Policy.

This Privacy Policy may change from time to time. Your continued use of our Services is deemed acceptance of such changes, so you should check this page periodically for updates.

# TYPES OF PERSONAL INFORMATION WE COLLECT

“Personal Information” is any information that can either directly or indirectly identify you as an individual. During the course of our operations, we may collect Personal Information in accordance with the law, such as:

* + Email address.
	+ Organization (if indicated in an email you send).
	+ Contact preferences.

If you submit any Personal Information to us about another individual (e.g., requesting a newsletter on their behalf), you represent that you are authorized to do so and permit us to use the information in accordance with this Privacy Policy.

# HOW WE COLLECT YOUR INFORMATION

We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information through:

**Direct interactions** - You may give us your information when requesting or subscribing to our newsletter. We keep a record of your interactions with us in our database.

**Automated technologies or interactions** - As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Typically, the data we collect automatically does not reveal your specific identify or directly relate to an individual; however, to the extent that it does reveal your specific identify or relate to an individual, we will protect the information in accordance with this Privacy Policy.

We collect data through these automated technologies and interactions from:

* **Cookies** - Cookies are small pieces of information that are stored in a browser-related file on your computer’s hard drive when you visit our site. We use cookies to collect and maintain aggregated data (such as the number of visitors) to help us see which areas are most popular with our users and improve and update the content on our website. Cookies are widely used on most major sites.

If you do not want data collected with cookies, you can learn more about controlling cookies at: [http://www.allaboutcookies.org/manage-cookies/index.html.](http://www.allaboutcookies.org/manage-cookies/index.html)

You can choose whether to accept cookies by changing the settings on your browser or, if you are an EU resident, by managing your settings using our preferences tool. If, however, you do not accept cookies, you may experience some inconvenience in your use of the our website. You also will not receive advertising or other offers from us that are relevant to your interests and needs. At this time, we do not respond to browser “Do-Not-Track” signals.

* **Pixel Tags and other similar technologies** - We collect data from pixel tags (also known as web beacons and clear GIFs), which are used to, among other things, track the actions of users of the Website or email recipients of HTML email communications (did you open the

e-mail), measure the success of our marketing campaigns and compile statistics about usage of the Website.

* **Analytics** - Google Analytics is a web analysis service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Websites. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available

at [https://tools.google.com/dlpage/gaoptout.](https://tools.google.com/dlpage/gaoptout)

* **Your IP Address** - We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Websites. We also may derive your approximate location from your IP address (Geolocation).

**Aggregated Data.** We may aggregate data that we collected, and this aggregated data will not personally identify you or any other user.

**Social media**

Depending on your settings or the privacy policies for social media services like Instagram or Twitter, you may give us permission to access information from those accounts or services, such as your online behavior. The majority of this behavior is anonymized. For more information on how to control your privacy settings for these services, go to the following links:

Instagram - [Privacy Policy](https://help.instagram.com/155833707900388) Twitter - [Privacy Policy](https://twitter.com/en/privacy) YouTube - [Privacy Policy](https://www.youtube.com/static?template=privacy_guidelines&gl=GB)

# WHY WE USE PERSONAL INFORMATION

We primarily use your Personal Information to provide you with our newsletter or for announcements regarding new information on our website.

We may also use your information to contact you for feedback (survey), to ensure we are providing the best possible service and, based on your contact preferences, about ABF news. We will only contact you by email about non-contractual information where we have youre consent to do so.

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| **Purpose/Activity** | **Lawful Basis for Processing** |
| Manage our relationship with you:* Notifying about changes to our terms.
* Asking you to leave a review or take a survey.
* For internal administrative purposes.
 | * Necessary to comply with a legal obligation.
* Necessary for our legitimate interests (to keep our records updated, ensure we are responsive to your questions and requests, and assess feedback so we can continue to improve our services to you).
 |
| Send you relevant communications and newsletters. | * Consent.
 |
| To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). | * Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud).
* Necessary to comply with a legal obligation.
 |
| To deliver relevant Website content and advertisements to you, and measure or understand the effectiveness of the advertising we serve to you. | * Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
 |
| To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences. | * Necessary for our legitimate interests (to identify types of customers that will be interested in specific postings, poems and films, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
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| Monitoring and preventing unlawful acts (including with the use of closed circuit television, card keys, and other security systems). | * Necessary for the purposes of the prevention or detection of an unlawful acts and public safety.
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# SHARING OF PERSONAL INFORMATION

We reveal personal information about you to unaffiliated third parties if:

* You request or authorize it.
* The information is provided to comply with the law, applicable regulations, court orders or subpoenas; to enforce our Terms of Use or other agreements; or to protect our rights, property or safety – or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection).
* The disclosure is done as part of a purchase, transfer or sale of our services or assets (e.g., in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets).
* The information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, bankers, auditors, etc.)
* To others as described in this Privacy Policy.

# TRANSFER OF DATA

Your information, including Personal Data, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. As such, we have put in place procedures to deal with any suspected personal data breach, and we will notify you and any applicable regulator of a breach where we are legally required to do so.

# RETENTION OF DATA

We will retain your Personal Information only for as long as necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Website usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Website, or we are legally obligated to retain this data for longer time periods.

# CHILDREN’S PRIVACY AND PARENTAL CONSENT

**If you are under 18**, please ensure you obtain your parent/guardian's consent before you provide personal information to the website. If you don’t have that consent, you must not provide personal information to us.

# YOUR DATA PROTECTION RIGHTS

ABF aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Information we hold about you, object to our processing, and/or if you want it to be removed from our systems, please contact us at Privacy@brinkerhoffpoetry.org.

If you no longer want to receive marketing related e-mails, you may opt out anytime by contacting us directly at Privacy@brinkerhoffpoetry.org or by clicking the unsubscribe button located at the bottom of every marketing e-mail).

If you are a resident of the European Economic Area (EEA), you have certain data protection rights afforded to you by the Global Data Protection Regulation (“GDPR”), as follows:

* **Access to your personal data:** You may request access to a copy of your personal data.
* **Right to withdraw:** Where you have given your consent for us to use your personal data, you may withdraw your consent at any time. Please contact us using the details located below if you would like to withdraw your consent, and we will delete your data in line with your right to erasure.
* **Rectification:** You may ask us to rectify inaccurate information held about you. If you would like to update the data we hold about you, please contact us using the details below, and we will provide the updated information.
* **Erasure:** You may ask us to delete your personal data. If you would like us to delete the personal data we hold about you, please contact us at Privacy@brinkerhoffpoetry.org, specifying why you would like us to delete your personal data.

o Please note that we often need to retain certain data for recordkeeping purposes. There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

* **Portability:** You may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal data to another data controller.
* **Right to object:** You may object to our processing of your personal data pursuant to this Privacy Policy. Please contact us using the details below, providing details of your objection.
* **Make a complaint:** If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the General Data Protection Regulation, you have the right to lodge a complaint at the Information Commissioner's Office (ICO) (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Please note that we may ask you to verify your identity before responding to such requests.

# POLICY MODIFICATIONS AND CONTACTING US

We reserve the right to change this Privacy Policy at any time. Notice of changes will be published on this page. Changes will always be prospective, not retroactive. If you have questions about our policies, please contact: Privacy@brinkerhoffpoetry.org.