Last updated: June 22, 2018

# Columbuscatholic.org and Education.Columbuscatholic.org

### PRIVACY POLICY

Thank you for visiting Columbuscatholic.org and/or education.columbuscatholic.org sites presented to you by the Diocese of Columbus (the "Site"). Your privacy is important to us. As such, we provide this Privacy Policy ("the Policy") to explain our online information practices and the choices you can make about the way your information is collected and used at this general audience Site.

If you have any questions about this Policy, please free to email George Jones, Director of the Office of Communications, at commailbox@columbuscatholic.org or write to us at:

Privacy Matters
Diocese of Columbus
c/o George Jones
197 E. Gay Street
Columbus, OH 43215

This Policy is incorporated by reference into the <u>Terms and Conditions of Use Agreement</u> to which you agreed upon entering the Site. Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using this Site, you agree to this Policy. If you do not agree with this Policy, your choice is not to use our Site. This Policy may change from time to time. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

#### Information We Collect and How We Use It:

We collect several types of information from and about users to personalize and improve your experience at the Site, including information:

- by which you may be personally identified, such as first name, last name, postal address, and/or e-mail address, telephone numbers (cell, home, work) ("personal information");
- that is about you but individually does not identify you, such as your internet connection, the equipment you use to access the Site and usage details.

We collect this information directly from you, automatically, or from third parties.

#### Information You Provide:

We receive personal information from you when you contact us with inquiries, enter a contest, respond to one of our surveys, sign up for a newsletter, make an on-line donation, or engage in any interactive portion of the Site.

Any personal information you provide is voluntary. The Site may combine information that you voluntarily give us with information from third parties and affiliates.

#### Automatic Information:

We automatically receive and record certain types of information whenever you interact with us. This information, which is recordable any time you use the Internet, includes the Internet Protocol (IP) address used to connect your computer to the Internet; your domain name, if any; and computer and connection information, such as browser type and version. We use this information to learn how you use the Site, to remember your preferences, and to diagnose problems. No personal information is available or used in this process.

The technologies we use for this automatic data collection may include:

Cookies (or browser cookies): a cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.

Flash Cookies: certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Web Beacons: pages of our the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).

#### Aggregated Usage Information:

We may post aggregated usage information to third parties, such as content licensors and advertisers, for diagnostic, billing and sales purposes, where applicable. However, such information will not include any personal information. This information is purely statistical in nature and cannot be tied to you.

#### Links & Advertisements:

To better serve you, we may provide you with external links to other sites which we believe can offer you useful information and services. Any external (non-ColumbusCatholic.org or non-education.columbuscatholic.org) web sites to which we provide links will be subject to their own privacy policies, and you will need to review those policies. This includes use of any social media sites (ex. Facebook.com) if you intend to share items on the Site. Use of cookies by third parties is subject to their own privacy policies and not this Policy.

#### Information Sharing:

In addition to the third party sharing discussed above, the Diocese of Columbus (the "Diocese") only shares personal information with other companies or individuals outside of the Diocese in the following limited circumstances:

- We provide such information to our affiliated companies or other trusted businesses or
  persons for the purpose of processing personal information on our behalf. We require that
  these parties agree to process such information based on instructions and in compliance
  with this Policy and any other appropriate confidentiality and security measures.
- We provide personal information about you to third parties in order to provide services or products that you have requested; when we have your permission; otherwise described in this Policy.
- We share your information with our affiliates or agents in order to provide services or communicate with you on our behalf.
- We disclose information if required by law, such as in response to a subpoena or similar legal process, or as necessary to enforce the <u>Terms and Conditions of Use</u> for the Site. If we are combined with another diocese and substantially all of our assets are transferred, user information may be one of the transferred assets. We will not be liable for your information no longer in our possession. We cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Policy. By way of example but not limitation, we may be forced to disclose personal information to the government or third parties under certain circumstances, or third parties may unlawfully intercept or access transmissions or private communications.

#### Information Security:

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site like message boards (if it has that functionality). The information you share in public areas may be viewed by any user of the Site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

#### Accessing and Updating Personal Information:

When you use the Site, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical, or for which access is not otherwise required.

#### Children Under The Age of 13:

Our Site is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Site. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Site or on or through any of its features or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at <a href="mailto:commailbox@columbuscatholic.org">commailbox@columbuscatholic.org</a>.

#### Privacy Rights of California Residents:

If you are a California resident, you are entitled to additional privacy rights under California Civil Code § 1798.83. If you submit a written request to the address above, we will provide you with a California Customer Choice Notice that you may use to opt-out of third party personal information sharing. Please specify on your request that you are seeking your "California Customer Choice Notice" and allow at least 30 days for a response.

General Data Protection Regulation (GDPR)

## The following section only applies to people using our Site who are located within the boundaries of the European Union.

In accordance with the General Data Protection Regulation (GDPR), we are updating this Policy to reflect protections for any usage by any person located in the European Union (EU). While we did not incorporate the entire GDPR regulation here, we still will follow the entire regulation protocol. Below are just 2 provisions of the regulation that we wish to highlight.

In accordance with Chapter 3, Section 3, Article 17 - Right of Erasure ("right to be forgotten") of the GDPR, if any person requests removal of their personal data, we will comply with the request, provided that the request does not conflict with any provision of Article 17. To request the removal of your personal data, please contact us in writing at the address listed on page 1 of this Policy. We will accept only written requests for removal of personal data. We will acknowledge your request within 15 business days of receipt of the written request. We will also acknowledge when the request has been completed. If the request cannot be completed, we will write you back and inform you as to the reason.

In accordance with Chapter 4, Section 1 Article 25 - Data Protection by design and by default, of the GDPR, we have incorporated steps to reasonably protect your personal information from any unauthorized access (see Information Security section above).

#### Changes to this Privacy Policy:

We reserve the right to change this Policy at any time. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Site's home page. The date the Policy was last revised is identified at the top of this page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Policy to check for any changes.

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