



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

EFFECTIVE 09/01/2015

YMCA BUFFALO NIAGARA EXTERNAL 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 policy carefully.

1.0 PRIVACY

We keep your private information private by:

Not selling your information—You've entrusted us with your personal information, and we're committed to using it wisely. YMCA Buffalo Niagara will not sell your personal information to anyone, for any reason, at any time.

Restricting who has access to your information—We take precautions to ensure that your internet account and personal information are accessible only by employees who are authorized to have access to your personal information.

If you have any questions or concerns about our privacy policy, please contact us at:
ymcabn@ymcabn.org

Please refer back to this policy regularly. We may need to change this policy from time to time in order to address new issues and reflect changes on our Site. We will post those changes here and update the "last updated" date at the top 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 YMCA Buffalo Niagara either through this Site, in person, or otherwise. This policy does not apply to your use of unaffiliated sites to which this site links.

Collection of Personally Identifiable Information

YMCA Buffalo Niagara collects personally identifiable information ("PII") from you when you voluntarily submit such information to us. This information may include your name, home address, email address, date of birth, demographic information, health information, and other information that we may need to collect in connection with certain events, including but not limited to:

- Registration for, or participation in, events, classes, camps, and other activities;
- Registration for surveys, forums, content submissions, chats, bulletin boards, discussion groups, requests for suggestions, or other services or activities offered on this Site;
- Answering your inquiries about our Site, organization, membership, or other services or activities;
- Registration as a member of YMCA Buffalo Niagara
- Processing a donation to YMCA Buffalo Niagara

Use and Disclosure of Personally Identifiable Information

If you do provide us with PII for an activity, event, or service, we may use it to conduct such activity, event, or service and future YMCA activities that may be of interest to you. The YMCA Buffalo Niagara may contact you based on the information you provide online or offline.

We reasonably endeavor to ensure that we never intentionally disclose any PII about you as an individual 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 law.

YMCA Buffalo Niagara does not rent or sell PII, including information provided about children, to third parties. YMCA Buffalo Niagara may share PII with trusted service providers that need access to your information to provide operational or other support services. We also may share your information with the YMCA of the USA, which is a national resource office for YMCA Buffalo Niagara and other local YMCAs, in order to help improve the overall network of YMCAs.

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 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 this Site and to provide us with technical information about your Site 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, technical information about your means of connection to our Sites (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 Sites and about the links you may select from within our 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, YMCA Buffalo Niagara’s information collection and disclosure practices and the choices it offers to consumers will continue to operate as described in this Policy.

Use of Your Non-Personally Identifiable Information

We use non-personally identifiable information for our purposes related to running the YMCA and its programs, and, in particular, to administer this Site, and, in the aggregate, to determine what technologies are being used so that we may continually improve our Site. We may also share aggregate, non-personally identifiable information with other third parties.

Collection of Sensitive Information

Where necessary, we may collect certain sensitive information from you, including:

- Payment card or bank account information to process electronic payments. Your payment information is transmitted to us using a secure internet method that helps ensure the privacy of this information. During the time your payment information resides on our computers, it is in an encrypted format and cannot be accessed by YMCA staff.
- 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.

Any third party that processes sensitive information on behalf of YMCA Buffalo Niagara will be contractually obligated to safeguard your data in the same manner as YMCA Buffalo Niagara

Privacy of Children

We are mindful that young people need special safeguards and privacy protection. We realize that they may not understand all 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 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.

If we ask for PII from children under 13 on this Site, in person, or through any other mechanism, we will take additional steps to protect the privacy of such information, including:

- Obtaining 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 collection of PII from children to no more than is reasonably necessary to accomplish the purpose of the collection; and
- Giving parents access to the PII we have collected from their children and offering them the opportunity to request that such PII be changed or deleted.

Links to Other Sites

Users may find other content on our Site that link to the sites and services of other third parties. We do not control the content or links that appear on these sites. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies, or no policy (policies) at all. 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 ymcabn@ymcabn.org. 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 Subject Access and Accuracy

You may contact YMCA 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

The YMCA takes 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, although we cannot provide an absolute guarantee of the security of our Site or any other site on the Internet

Consent to Transfer

The Sites are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States, even though the United States has privacy laws that the European Union considers not to be adequate. By using our Site, participating in any of our 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. YMCA Buffalo Niagara 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 ymcabn@ymcabn.org or via a written request mailed to:

*YMCA Buffalo Niagara
IS Department
301 Cayuga Rd Suite 100
Buffalo, NY 14225*

Please do not send Social Security Numbers or other sensitive information to us via unencrypted email.

Policy Revision History

Version:	Effective Date:	Authorized by:	Affected Provisions:
Version 0.1	September 1, 2015	Matt Shriver/CFO	