

IPC Pathways Website Privacy Policy  
<https://harraseeketfoundation.org/immanuel-pathways/>

Last Updated: June 6, 2018

This Privacy Policy (the “**Policy**”) describes how the IPC Pathways website <https://harraseeketfoundation.org/immanuel-pathways/> and related Airtable mentor directory, each operated by [The Harraseeket Foundation](#) (the “**Site**”), collects, uses, stores, and discloses information you may provide us via the Site. Please read this entire Policy before using or submitting information to the Site. By using the Site, you are deemed to agree to the terms of this Policy, so please do not use the Site if you do not agree with these terms.

The Harraseeket Foundation, including its staff, board members, and advisors (collectively, “Harraseeket” -- referred to herein as “we” or “us”) may update this Policy at any time. Any changes to the Policy will become effective upon the date of our posting of the revised Policy on the Site. If you visit the Site following the effective date of the revised Policy, you will be deemed to have accepted the Policy’s updated terms.

## **I. What Types of Information Does Harraseeket Collect Through the Site?**

The information we collect through the Site includes certain “Personally Identifiable Information” (or “**PII**”), which is information that identifies you as an individual. We collect PII through the Site when you voluntarily provide it, such as by registering as a mentor or as a “seeker” (a person seeking guidance from a mentor) or by sending us a message through our “Contact Us” page. If you register as a mentor, you will need to provide your first and last name, your email address, the categories of work in which you have been involved, and your approximate age. You may also provide any other information relevant to your career experiences, and you will have the option of posting a photo of yourself and uploading a video describing your career experiences. If you register as a seeker, you will need to provide your name and your email address, and, if you wish, your school or work status, a description of your work experience (if any), and your career interests.

The Site also invites you to complete on-line surveys about your experience in communicating with mentors and/or seekers, and collects PII from you if you respond to such surveys.

In addition to PII, the Site also automatically collects information about you that is generally not PII (“**Non-PII**”) but relates to your use of the Site. Non-PII is aggregated information, demographic information and any other information that does not reveal your specific identity. Non-PII is “passively” collected from you through browser navigational tools, such as cookies, pixel tags, “log files,” “server logs,” and “clickstream data.” These types of technologies enable the Site to compile statistics about our daily

number of Site visitors or specific page requests, and to identify a webpage you may have visited before visiting a Site. The Site currently does not respond to a “Do Not Track” browser signal from a user.

Cookies are small data files that a website stores on the hard drive of the device through which a website user connects to the website. You can set your browser to accept all cookies, to reject all cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. However, refusing a cookie may in some cases preclude you from using, or negatively affect the display or function of, a Site or certain areas or features of a Site. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

*By using the Site, you are deemed to unambiguously agree to its use of any cookies that you do not disable.*

## **II. How Does Harraseeket Use the Information It Collects?**

- A. PII.** We may use the PII that we collect about you for any or all of the following purposes:
- 1. Responding to Requests.** To respond to your requests, such as to answer your questions sent through the “Contact Us” page on the Site.
  - 2. Communications with You.** If you register as a mentor or seeker, we may use your contact information to communicate with you about your background and experiences and also to suggest connections that you might make with mentors or seekers.
  - 3. Improving the Site.** We use PII about you, such as your responses to our online surveys, to help us improve the Site, including by requesting further feedback, and for related internal purposes such as data analysis, audits, identifying usage trends, and enhancing the Pathways program.
  - 4. Furthering our Mission.** We use PII about you, such as your feedback from our surveys, the extent to which you make use of connections with mentors or seekers, and the specific experiences you have had and describe on the Site, to inform our decision-making as we proceed to fulfill our mission to help communities enrich the career lives of their members.
- B. Other Information.** We may use non-PII for a variety of purposes, primarily Site-usage analyses. If any such use involved combining the non-PII with any data so that it became identifiable to you or another person, we would then treat the information as PII in accordance with this Policy.

### III. With Whom Does Harraseeket Share PII Collected Through the Site?

- A. **Seekers Using the Site.** If you register as a mentor on the Site, we will make the PII you have provided about yourself and your interests available to seekers, who may wish to contact you to learn more about your experiences.
- B. **Third Party Service Providers.** We may share PII with unaffiliated third parties who provide us with services, such as the designer of the Site and others who assist us with technology, data storage, data analysis, or similar services. We do not share PII with unaffiliated third parties for their own marketing purposes.
- C. **Acquirers or Assignees.** In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Harraseeket or its assets, we may transfer any and all information that we collect from Site users to the acquiring party or assignee.
- D. **Entities Entitled Under Law.** We may disclose PII as we believe to be appropriate in the following circumstances: (i) when required by applicable law, including laws outside your country of residence; (ii) to comply with legal process (iii) to respond to requests from public and government authorities; (iv) to enforce the terms and conditions for use of the Site, including this Policy; (v) to protect and defend our rights and property; (vi) to protect the interests of Harraseeket or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain. We have no obligation to notify you of such disclosures, except as required by applicable law.

### IV. How Can You Manage PII We Maintain?

To keep your PII accurate, current, and complete, please contact us as specified in Section IX below. We will take reasonable steps to update or correct PII in our possession that you have previously submitted via this site. Please note that we are not responsible for correcting, updating or deleting any information in the databases of third parties.

### V. How Does Harraseeket Protect and Maintain PII Collected Through the Site?

- A. **Security.** We will take reasonable steps to protect your PII as you transmit it from your computer to our Site and to protect it from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. You should be aware that no Internet transmission is ever fully secure or

error-free. In particular, e-mail transmissions may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Moreover, where you use passwords, ID numbers, or other special access features on this site, it is your responsibility to safeguard them from disclosure or misuse.

**B. Data Retention.** We will retain PII about you for the period necessary to fulfill the purposes outlined in this Policy.

**VI. Collection of PII by Others.** The Site may contain links to websites operated by parties not affiliated with Harraseeket. These linked sites are not under Harraseeket's control and we are not responsible for the privacy practices or the contents of any such unaffiliated parties or their websites. If you provide PII through any such third-party website, the PII will be collected by, and controlled by the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties, which are not governed by this Policy.

**VII. Use of the Site by Children.** The Site is not directed to children under the age of thirteen (13), and we do not knowingly collect PII from any children under age 13. If you are under age 13, please do not submit any PII to us.

**VIII. International Transfers of Information.** By using the Site, you are deemed to understand and unambiguously consent to the collection and processing of your PII in the United States, with the awareness that the laws of the United States may not provide as much protection for PII as the laws of certain other countries or territories.

**IX. Contacting Us.** If you have any questions or concerns related to this Privacy Policy or the information practices of this Site, please contact us by email at [administrator@harraseeketfoundation.org](mailto:administrator@harraseeketfoundation.org), or by mail at:

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