

SAFECode Privacy Policy

SAFECode is committed to protecting your privacy. This Privacy Policy explains our data practices regarding Personal Data (as defined below) and other information that we collect in connection with:

(i) your use of the website www.safecode.org, where you can learn more about SAFECode's services, and request information and content

(ii) events you may attend (for example, webinars).

By using our Website, you consent to policies and practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our Website.

Our Collection of Your Personal Data

SAFECode collects and uses information that, alone or in combination with other information, could be used to identify you ("**Personal Data**") in order to deliver our services, process applications to join our organization, inform you of various opportunities, and provide support, as described below (please also see the "How We Use Information" section below).

Personal Data That You Voluntarily Provide To Us. SAFECode primarily collects Personal Data provided to us by individuals when they interact with our services. For example, you may voluntarily provide us with Personal Data when you sign up to participate in our blogs, sign up for a webinar, ask to download content (such as a white paper or a brochure), submit a web form, call or email us directly, request an overview of our services, or submit your business card.

The types of Personal Data that we collect vary based on the services offered on the websites, but generally include your name, address, telephone number, company name, job title, e-mail address, and other information that you voluntarily submit to us.

You should carefully consider whether you wish to submit Personal Data. You should also review any additional terms and conditions that may govern your use of our services.

Automatically Collected Data. As you interact on our Website, we may collect information about your computer or device and visits to our Website ("**Automatically Collected Data**") through cookies, web beacons and other

technologies, Internet Protocol (IP) address tracking/URL tracking, and other tools (collectively, “**Tracking Technologies**”). The types of Automatically Collected Data collected on our Website through the use of these and other tools that we may add from time to time may include: the search terms you used, new or returning user information, browser information, computer or device type, operating system, internet service provider, website usage, referring/exit pages, platform type, date/time stamp, and number of clicks. Please see the “Tracking Technologies” section below to learn more about how we use Tracking Technologies.

How We Use Information

Provide our services and respond to requests. We use the Personal Data we collect from you (unless otherwise restricted by law) to:

- Provide you support or other services you have ordered from us and other similar operational communications. For EU Data Subjects, such use is necessary for the performance of the contract between you and us.
- Respond directly to your information requests (including registrations or other specific requests) or other inquiries. For EU Data Subjects, such use is necessary to respond to or implement your request prior to entering into a contract with us.

Marketing. We also use your contact information to contact you by email regarding information that we think may be of interest to you. If you do not wish to receive marketing materials, brochures, or emails from SAFECode, you may inform us of your preference by sending a letter or calling SAFECode at the contact information below. You may also submit a contact form electronically through the Websites and unsubscribe from our marketing communications by clicking on the “unsubscribe” link located on the bottom of our e-mails.

Where required by the applicable law (for example, if you are an EU Data Subject), we will send you marketing information or notifications only with your consent, which was given at the time you provided us with the Personal Data. In such case, if you do not provide us with your consent to the processing of your Personal Data for this purpose, we will not send you this information, (please refer to the “EU Data Subjects” section below for information on your rights). For California residents, please consult the “Your Privacy Rights” section below for additional considerations.

Correspondence. If you correspond with SAFECode via e-mail, the postal service, our web forms, or other form of communication, we may retain the correspondence and the information it contains. We may use the information for business purposes,

including responding to your inquiry, notifying you of SAFECode-related opportunities, and other marketing purposes (please read the Marketing section above for more information on our marketing practices and how to opt out or unsubscribe).

URL and IP Address. SAFECode collects information about users' IP addresses, including users' utilization of our Website, to help us design our Website to better suit our Website users' needs. We may use information about your IP address to help diagnose problems with our server, administer our Website, analyze trends, track visitor movements, and gather information that assists us in identifying visitor preferences. We also may use your IP address to enhance our security and investigate an actual or potential security incident. For EU Data Subjects, this use of your information is necessary for our legitimate interests in understanding how the Website and our Services are being used by you, to improve your experience on it and ensuring network and information security. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "EU Data Subjects" section below.

Aggregated Data. We may also compile, anonymize and/or aggregate Personal Data and other information collected about Websites' visitors, as described in this Privacy Policy, and use such anonymized and/or aggregated data for our business purposes, including disclosing such data to our partners, service providers, and/or other third parties for marketing or promotional purposes. This aggregate information does not identify you. For EU Data Subjects, this use of your Personal Data is necessary for our legitimate interests in understanding how the Websites and our products and services are being used by you and to improve your experience on it. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "EU Data Subjects" section below.

Disclosure of Information

SAFECode discloses Personal Data that we collect (described above) in accordance with the terms set forth in this section.

We share your Personal Data with third parties who provide certain services to us to assist us in meeting business operation needs. These parties are authorized to process your Personal Data, on our behalf and pursuant to our instructions, only as necessary to provide these services to us. We share your Personal Data with the following service providers:

- Providers of payment processing and accounting, as necessary to process payment from our Clients
- Providers helping us fulfill subscription services (such as Salesforce, Emma)
- Providers of research and analytics services, including Google Analytics
- Providers of cloud computing infrastructure services

We may also disclose Personal Data to third parties in the following circumstances: (1) if you request or authorize (when required by the law, we will inform you in advance of the third parties to which we may provide your data and the purpose for doing so, and we will obtain your prior consent for such use); (2) the information is provided (a) to comply with the law (for example, to comply with a search warrant, subpoena or other legal process), (b) to enforce an agreement we have with you, (c) to protect our rights, property or safety, or the rights, property or safety of our employees or others, (d) to investigate fraud, or (e) to respond to a government request or to lawful requests by public authorities, including to meet national security or law enforcement requirements; (3) to address emergencies or acts of God; (4) to address disputes, claims, or to persons holding a legal or beneficial interest; (5) if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, in which case your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

We collect, store and process the information from our Websites and Apps in the U.S. If you are outside the U.S., then your Personal Data and other information will be transferred to the U.S. The data privacy and data protection laws outside your country may offer less protection than the laws in your country. By using our services, the Website and/or Apps or otherwise providing us with your Personal Data, you agree to the transfer of your Personal Data as described in this Privacy Policy. If you do not agree to such cross-border transfers of your Personal Data, please do not submit it through the Website and/or Apps.

The Website uses interfaces with social media websites or platforms that are owned and/or controlled by third parties, such as Facebook, LinkedIn, Twitter and others (“**Social Media Sites**”). If you choose to “like” or share information from a Website through any Social Media Sites, if you are a member of a Social Media Site the interfaces on our Websites may allow the Social Media Site to connect your website visit to your Personal Data. The information that you share with the Social Media Sites will be governed by the specific privacy policies and terms of service of the Social Media Sites and not by this Privacy Policy. You should review the privacy policy

of that Social Media Site before choosing to access and use any Social Media Sites, including interacting with our pages on those sites.

How You Can Access and Change Information

SAFECode acknowledges that you have the right to access your Personal Data. In case you request us to remove data, we will respond within a reasonable timeframe.

Upon request, SAFECode will provide you with information about whether we hold any of your Personal Data. You can update or correct your Personal Data or remove it from our system by making a request to us at the contact information provided below. Requests typically receive a response within thirty (30) days. If access cannot be provided within that time frame, we will provide the requesting party with an estimated date by which the information will be provided. If for some reason access is denied, we will provide an explanation of why access has been denied.

If you are an EU Data Subject, please see the “EU Data Subject” section below for information on your rights in relation to the Personal Data we hold about you.

EU Data Subjects

Scope. This section applies if you are an individual located in the European Union or European Economic Area (collectively, “EU”) (“EU Data Subject”). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland.

Data Controller. SAFECode is the data controller for the processing of your Personal Data.

Your Rights. Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we

may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so:
 - If we are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or
 - If we are processing your Personal Data for direct marketing.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, that affect you, unless such processing is necessary for entering into, or the performance of, a contract between you and us or you provide your explicit consent to such processing.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under “Contact Us” section below.

Legitimate Interest. “Legitimate interests” means the interests of SAFECode in conducting and managing our organization. For example, we have a legitimate interest in processing your Personal Data to analyze how the Website, Apps and our services are being used by you, and to ensure network and information security, as described in this Privacy Policy. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent, or those activities are otherwise required or permitted to by law. You have the right to object to processing that is based on our legitimate interests. For more information on your rights, please see “Your Rights” section above.

Retention Of Personal Data

Personal data that we process will not be retained for longer than is necessary for the purpose(s) for which it has been obtained. In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on customary business practice.

Notwithstanding any contrary provisions in this Policy, however, we may retain your Personal Data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Our Security Measures to Protect Your Personal Data

We are committed to taking reasonable efforts to secure the information that you choose to provide us, and we use a variety of security procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of Personal Data. We restrict access to Personal Data to our employees, contractors and service providers (described in the “Disclosure of Information” section above) who need to know the information to operate, develop, or improve our services.

Unfortunately, no transmission of Personal Data over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, SAFECode cannot guarantee or warrant the security of any information you transmit to us, or to or from our online services. SAFECode has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this Privacy

Policy or the security of your Personal Data, please contact us as indicated under the “Contact Us” section below.

We retain your Personal Data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

Tracking Technologies

SAFECode uses cookies and other technologies to analyze trends, administer the Website, track users’ movements around the Website, to gather demographic information about our user base and to collect information about your browsing habits to make advertising relevant to you and your interests, as described below.

When you first visit the Website, you will be asked to consent to the use of cookies and similar technologies on the Website in accordance with this Policy, and if you accept we will store cookies and similar technologies on your computer.

I. What Are Cookies?

Cookies are pieces of data sent to your browser when you visit a website and stored on your computer’s hard drive. Cookies may store user preferences and other information. For example, cookies can store your session information for easy log-in to a website or platform, or your language or user interface customization preferences or may allow websites to record your browsing activities (for example, number of page views, number of visitors, and time spent on each page).

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for a set period or until you delete it.

II. How We Use Cookies

We classify cookies in the following categories:

Categories of Use	Purpose	
Strictly Necessary	These cookies allow us to link the actions of a user during a browser session to allow navigation around web pages, access to secure areas of the Websites or Platforms and help make the services available through our Websites and Platforms work. Without	You can block or delete these cookies by changing the browser settings as explained below

	these cookies, basic functions of the Website would not work.	
Analytics	<p>These cookies allow us to recognize and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example by making sure visitors are finding what they need easily. The information collected through these cookies include anonymous traffic statistics, like number of page views, number of visitors, and time spent on each page.</p> <p>We use cookies from Google Analytics, a web analytics service provided by Google Inc. (“Google”). The information collected by Google (including your internet protocol (IP) address) will be transmitted to and stored by Google on servers in the United States. Google will use this information on our behalf for evaluating your use of the Website, compiling reports on the Website’s activity and providing further services to us relating to the Websites usage. Learn more about Google Analytics’ privacy practices, and see a copy of Google’s privacy policy, at the following link: https://support.google.com/analytics/answer/6004245?hl=en&ref_topic=2919631.</p>	<p>You can block or delete these cookies by changing the browser settings as explained below.</p> <p>You can also prevent your data from being collected by Google Analytics on the Website by downloading and installing the Google Analytics Opt-out Browser Add-on for your current web browser at the following link: https://tools.google.com/dlpage/gaoptout?hl=en.</p>

III. Other Technologies

SAFECode may use a tracking technique that employs embedded URLs to allow use of the Website without cookies. Embedded URLs allow limited information to follow you as you navigate the Websites but are not associated with Personal Data and are not used beyond the session.

SAFECode and its service providers may use embedded pixel technologies (or pixel tags) for the purposes of identifying unique user visits (as opposed to aggregate hits). In addition, embedded pixels or other technologies may be used in e-mails to provide information on when the e-mail was opened to track marketing campaign responsiveness; information collected using these technologies may be associated with the recipient's e-mail address.

We may use widgets, which are interactive mini-programs that run on our site to provide specific services from another company (e.g., links to bookmarked sites),

along with buttons or other tools that link to other companies' services (e.g., a "Like" button or third-party map). The widget, button or tool may collect and automatically send Personal Data, such as your e-mail address, or other Information (such as your browser information, or IP address), to a third party. Cookies may also be set or used by the widgets, buttons or tools to enable them to function properly or for other purposes, which may include advertising. Information collected or used by a widget, button or tool, including cookie settings and preferences, is governed by the privacy policy of the company that created it.

IV. Your Choices

On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser's settings on the most popular browsers:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Please note that if you reject cookies or disable cookies, your use of certain features or functions on our Website may be limited.

To find out more about cookies and similar technologies, including how to see what cookies and similar technologies have been set and how to manage and delete them, visit www.allaboutcookies.org and/or or the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org>, and follow the opt-out instructions there. If you access the Website on your mobile device, you may not be able to control tracking technologies through the settings.

Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties

This Privacy Policy only addresses SAFECODE's use and disclosure of your Personal Data. The Websites and Apps may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, and we are not liable for their misuse of Personal Data. We encourage you to be aware that when you go to another website you should carefully read their privacy policy.

California Privacy Rights

In addition to the information provided in this Privacy Policy, under California's "Shine the Light" law, California residents who provide "personal information" (as defined in the statute) in obtaining products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the personal information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year. To obtain this information, please contact us by sending a letter or calling us at the contact information below. You may also submit a contact form electronically through the Websites.

Children

The Website and Apps are not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13. Children under 13 should not use the Website or Apps.

Conditions of Use

By using the Website and our services, you agree to the terms and conditions contained in this Privacy Policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use the Website and/or any SAFECode benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Policy and Conditions of Use and any other agreement we have with you will be governed by the laws of Massachusetts. You also agree to arbitrate any such dispute in Wakefield, Massachusetts and to abide by any limitation on damages contained in any agreement we may have with you.

Changes to the Privacy Policy

As SAFECode and its services change from time to time, we may update this Privacy Policy to reflect changes to our information practices. We reserve the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online. Your continued use of the Website and/or continued provision of Personal Data to us will be subject to the terms of the then-current Privacy Policy. If we make any material changes or if otherwise required by the applicable law, we will notify you by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please contact us at:

Address: 401 Edgewater Place, Suite 600, Wakefield, MA 01880

Phone: 781-876-8833

Email: info@safecode.org

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