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Policy Owner: Compliance and CQI Director	Old Number: N/A	Effective Date: 10/9/2017	Date Revised: 10/9/2017	Rev # 2	Page 1 of 8

1.0 BACKGROUND AND PURPOSE

The Jewish Social Service Agency and Premier Homecare (collectively “JSSA” or “the agency” for purposes of this policy) are committed to maintaining the privacy of your Personal Information (defined below). Personal Information is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. We make every effort to have reasonable security measures in place to protect the loss, misuse, or alteration of Personal Information under our control.

The key purpose of this Privacy Policy is to disclose to website users how their Personal Information is being collected, stored, and used.

If you have any questions about your rights as a user of JSSA’s website, you may contact us using the contact information provided at the bottom of this Privacy Policy.

2.0-3.0 APPLICABILITY AND SCOPE

This Privacy Policy only applies to JSSA’s websites, located at www.jssa.org and www.premierhomecare.org (collectively the “Site” for purposes of this policy), and not to JSSA’s offline practices or to personal health information collected, used, or disclosed in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations (collectively, HIPAA) and privacy notices required by HIPAA. If there is a conflict between the terms of this policy and the terms of the HIPAA Notice of Privacy Practices, the terms of the HIPAA Notice of Privacy Practices will supersede the terms of this policy.

PLEASE READ THIS PRIVACY POLICY CAREFULLY BECAUSE BY USING THE WEBSITES AND SERVICES, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND TO OUR PROCESSING OF YOUR PERSONAL INFORMATION FOR THE PURPOSES STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITE.

Your use of the Site is also expressly subject to our Terms of Service. This Privacy Policy is incorporated by this reference into the Terms of Service, available at <https://www.jssa.org/about-us/ethics/>.

Please note the arbitration provision set forth below, requiring you to arbitrate any claims you may have against JSSA on an individual basis. Arbitration on an individual basis means that you will not have, and you waive, the right for a judge or jury to decide your claims, if any, and that you may not proceed in a class, consolidated, or representative capacity.

4.0 POLICY

4.1 Policy Statement

JSSA is committed to protecting your privacy. The Personal Information we collect and process can be categorized as data you have given to us, observed data of service use, and data derived or calculated with the use of analytics. We use this Personal Information to deliver and personalize services, manage customer relationships, develop services, provide targeted digital advertising, etc. We believe in the benefits of data and give you control and choice over processing your Personal Information.

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This Privacy Policy contains information about JSSA’s commitment to your privacy, including:

- The information we collect and how we use it;
- Your right to access or update your Personal Information;
- Your right to opt out of receiving communications from us; and
- Our pledge to have reasonable security measures in place to protect against loss, misuse, or alteration of information under our control.

4.1.1 Information We Collect

The types of Personal Information we collect from you depends on the services and the features you use on the Site. JSSA collects different types of information about you when you visit the Site: Personal Information (including, by way of example only, your name, address, telephone number, and email address) and Non-Personal Information (defined below), which includes Anonymized Information (defined below).

4.1.2 Personal Information

Personal Information refers to information that directly identifies, or can be used to determine the identity of, a person. This information may include, for example:

- Correspondence Information: if you request to be put on our e-mail list, we may collect your name and email address. Additionally, if you send us an email requesting information about JSSA or otherwise ask us a question, we may collect your name, address, email address, and other Personal Information so that we can respond to your request or question. We also may, from time to time, send you email and postal correspondence regarding products and services that we believe may be of interest to you.
- Payment, Donations, and Event Registration Information: JSSA uses a third-party vendor to process payments, including donations, and to manage the registration process for some of the events listed on the website. We note that these websites may have different policies relating to your privacy and information they collect about you. You should consult other sites’ privacy policies, as JSSA has no control over information that is submitted to, or controlled by, third parties. If you enroll in an event through JSSA, we will collect the information necessary to complete your request.
- Demographic Information: We may collect your demographic information such as your age, gender, city, state, and country.
- Usage Information: We may collect data about how you and your devices interact with the Site. This could include features you use, the web pages you visit, and the search terms you enter. This could also include data about your devices and the network you use to connect to our services, including IP

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address, device identifiers, and data about the performance of the services you use on the Site and any problems you experience with them.

- Location Information: We may collect your location information. This information may help us provide recommendations to you based on your location, serve you with advertisements, or direct you to a product or service that we believe may be of interest to you.
- Content and Other Information You Provide to Us: We collect additional content and information that you voluntarily provide us, such as content you submit when you contact us via the Site or by e-mail.

The above are only examples of the Personal Information that may be collected. If you do not want JSSA to collect your Personal Information, you should not provide it to us when it is requested.

4.1.3 Non-Personal and Anonymized Information

Non-Personal Information can be technical information, such as cookies, that does NOT identify you personally. Anonymized Information is information sufficiently stripped of personal identifiers. We note, however, that throughout time, Non-Personal Information could become Personal Information through regulatory developments, technological advancements, or co-mingling with Personal Information. We collect and use the following Non-Personal Information about you:

Cookies and Web Beacons: We may use certain kinds of technology such as cookies and web beacons or work with third-party web analytic service providers to collect information about how you use the Site. Some parts of the JSSA website may use a "cookie" – a file placed on your computer hard drive allowing the JSSA server to log the pages accessed in the Site to determine if you have visited before. Most browsers automatically accept cookies as the default setting. You may set your browser to warn you when placement of a cookie is requested so that you may decide whether to accept it. If you reject a cookie, some of the features available on the Site may not function properly.

A web beacon is an electronic image, also called a "gif," that may be in the form of a "png" image, as well as iframe, script, input link, embed, object, and other tags to track usage. These web beacons may be used on our web pages to deliver cookies, count visits and compile statistics on usage and effectiveness of our Site.

We may, at times, collect Non-Personal Information in manners that are not described above.

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4.2 How We Use Your Personal Information

We use your Personal Information in one or more of the following ways:

- Customize User Experiences. We may use your Personal Information to create customized experiences, or to provide you information or services tailored to your interests and preferences. We may use your IP address and other similar information to make our websites easier to use and navigate as well as to personalize the content provided on the Site.
- Communications. We also use your information to communicate with you about your membership, account, and inquiries, our company, and related news, as well as to send you promotional emails, surveys, newsletters, or notifications.
- Service Improvement. If you choose to subscribe to our newsletter and other services, register for an event, or donate to us, we will collect the information that you disclose and analyze the data to discover new facts that could help us better understand our services. We may use this information for our internal purposes, such as research to improve our services.
- Advertising, Marketing, and Promotions. We may use your information for generating web analytics to compile user information for marketing purposes, advertising, conducting marketing analysis, providing you with recommendations for products or services based on your profile, and promotional material planning and distribution.
- Service and Website Improvement. We may use the information about your use of our services, and your other activities on the Site to monitor user traffic patterns and to try to analyze what our users prefer, so that we can design better services and improve the Site. We may analyze the information that is collected with cookies and other tracking technologies to help us improve our function and to modify the services and information that we provide.

4.3 Sharing Your Personal Information with Third Parties

We may share or disclose your Personal Information to the following categories of entities and for the reasons described below.

4.3.1. Disclosure of Information by JSSA

JSSA may share your Personal Information in the following instances:

- With any affiliates, partners, agents, or other parties who are offering products and services that we believe may be of interest to you or who require your Personal Information for research, administrative, and/or internal business purposes. These parties may use your Personal Information to contact you with an offer or advertisement related to a product or service, or they may use such information for their own research, administrative, or business purposes. If you do not want us to share your information in this manner, you may elect to limit the information you provide to JSSA as more fully described in section 4.4 below.

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- JSSA also reserves the right to disclose your Personal and Non-Personal Information if JSSA reasonably believes it is required to do so to comply with the law or in the good faith belief that such action is necessary in order to conform to the requirements of law; to protect our rights or property or act in urgent circumstances to protect the rights or personal safety of another client or user; to reduce the risk of credit or other kind of fraud; or to comply with legal process served on us.
- To vendors, affiliates, and other third parties to process your request for a subscription to our newsletter. If you choose to subscribe to the Site or our newsletter, we may collect information from you, and we may use such collected information in order to process your request or donation. We may also provide such information, or other Personal Information provided by you, to unaffiliated third parties as necessary to complete your subscription or donation (for example, to process your credit card).
- To vendors, affiliates, strategic partners, agents, third party marketers, or other unaffiliated parties for advertising and marketing purposes, including generating web analytics and compiling user information for marketing purposes, advertising, conducting marketing analysis, providing you with recommendations for products or services based on your profile, and promotional material planning and distribution. If you do not want us to share your Personal Information in this manner, please do not provide us with this information, or please inform us that you would like to opt out of this type of sharing by contacting us following the instructions under section 4.4 below.
- To unaffiliated third-party service providers, agents or independent contractors who help us maintain our Site and provide other administrative services to us including, but not limited to, credit card processing services, providing customer service, maintaining and analyzing data, and sending donor communications on our behalf. Because such unaffiliated third-party service providers that help us administer our Site will have access to users' Personal Information, if you do not wish for our unaffiliated third-party service providers to have access to your information, please do not register or submit any Personal Information to us.
- To fulfill a request made by you. For example, if you email us a question or otherwise inquire about one of our events or volunteer opportunities, we may use your email address to process your request and respond to your question.

JSSA may share your information with third parties in order to fulfill your request or otherwise complete a service provided to you. JSSA also may share your Personal and Non-Personal Information with third parties that help manage our website, databases, and credit card processing companies.

In the unlikely event that all or substantially all of our assets are sold or transferred to another party, your Personal Information may be transferred to this acquiring entity.

We may choose to share Anonymized and Non-Personal Information with third parties for any reason.

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4.3.2. Third-Party Links

The Site may contain links to other websites. Additionally, third-party sites may link to the Site from time to time. PLEASE BE AWARE THAT WE ARE NOT RESPONSIBLE FOR THE CONTENT OR PRACTICES OF ANY OTHER WEBSITES. We encourage you to read the privacy statements of each and every website that you visit. Our Privacy Policy applies solely to the Site, located at www.jssa.org and www.premierhomecare.org.

4.4 Choices

JSSA provides you with the following choices regarding the use of your information:

- You may choose not to provide us with any Personal Information.
- You may set your browser not to accept cookies, or to warn you when a cookie is being placed on your computer. JSSA will not place tracking cookies on any computer where the browser provides a “do-not-track” signal. If you choose not to accept cookies, however, your ability to navigate this website may be hindered.
- If you would like to unsubscribe from our email list, you may do so by clicking the unsubscribe link in the email.
- If you would like to unsubscribe to any of our services or would like us to remove you from any of our online mailing lists, you may make this request by sending an email to contactus@jssa.org.
- If you would like to access the Personal Information we have collected about you and correct any inaccuracies, you may make this request by sending us an email at contactus@jssa.org.
- If you do not want us to share your information, you may notify us by sending an email to contactus@jssa.org.

We will process your requests as soon as possible, but please be aware that it may take us some time to respond to your request and, in some circumstances regarding opt-out requests, you may receive a few more messages until your request is processed.

4.5 Security

We implement security measures that we believe are reasonable to protect the loss, misuse, or alteration of information under our control. Your Personal Information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all credit information you supply is encrypted. We may use third-party products and services to secure or store your information. Please understand that no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any

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information you transmit to us. Understand that any information that you transfer to us is done at your own risk.

If we learn of a data security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. We may post a notice via the Services if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive written notice of a data privacy or security breach. If you have reason to believe that your Personal Information that we have collected or our system security has been breached, please notify us by e-mailing contactus@jssa.org.

To process your credit card and electronic check transactions, we use third parties that warrant that they are PCI-compliant service providers. Please consult such third-party service providers' privacy and security policies, as JSSA has no control over information that is submitted to, or controlled by, these third parties.

We will retain your Personal Information only for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is permitted or required by law.

If you have any questions about the security of our website, please contact JSSA's Privacy Officer using the contact information provided at the bottom of this Privacy Policy.

4.6 Notification of Changes

If we decide to change our Privacy Policy, we will post those changes on to our Privacy Policy on our website so you will always be aware of what information we collect, how we use it, and under what circumstances we disclose it. If at any point we decide to use Personal Information in a manner materially different from that stated at the time it was collected, we will notify you by way of email. You will then have a choice as to whether or not we may use your information in this manner. We will use information in accordance with the terms of the Privacy Policy in place at the time the information was collected.

4.7 Children's Online Privacy Protection

The Site is not targeted to children under the age of 13, and we do not knowingly collect Personal Information from any child under the age of 13 without parental consent. When we receive such information, we delete it as quickly as possible and do not use it or share it with third parties.

4.8 Your California Privacy Rights & How We Respond to Do-Not-Track Signals

California law permits visitors who are California residents to request certain information regarding JSSA's disclosure of Personal Information to third parties for direct marketing purposes. To make such a request, please send an email to contactus@jssa.org. We do not share Personal Information with third parties for their direct marketing purposes unless you consent to such disclosure, typically

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by “opting in” to receive information from a third party that is participating in a sweepstakes or other promotion on one of our Site.

The Site recognizes automated browser signals regarding tracking mechanisms, and we honor ‘do not track’ instructions.

4.9 Assignment

In the event that all or part of our assets are transferred to another party, you grant us the right to transfer and assign your Personal Information that we have collected via the Site.

4.10 Disputes; Agreement to Arbitrate; Choice of Law

Please see the JSSA Terms of Service, available at <https://www.jssa.org/about-us/ethics/>, for information on disputes, mandatory arbitration, and choice of law.

4.11 Contact Information

If you have any questions, comments, or concerns regarding our Privacy Policy or practices, please send an email, write to, or call at the following contact information:

Jewish Social Service Agency
 Attn: JSSA’s Privacy Officer
 200 Wood Hill Road
 Rockville, MD 20850
 Email: compliance@jssa.org
 Telephone: 301-838-4200

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Version Control

Version Number	Date	Applicable Section	Comments	Approver/Todd Schenk, CEO
V.2	10/09/17	Entire Policy	N/A	