

GIRLTREK

PRIVACY POLICY

Effective Date: August 9, 2019

GirlTrek Incorporated (“**GirlTrek**,” “**we**,” or “**us**”) recognizes that your privacy is important, and that your choice to share your information with our community should be fun, easy and understandable. This Privacy Policy explains how and why we collect, use, and share your information and how you can change, correct, or remove your personal information. This Privacy Policy applies to our collection of personal information through our www.GirlTrek.org website (“**Website**”), and from any other interactions you have with us.

Please note that this privacy policy does not cover or apply to our processing of information about employees, contractors or job candidates.

BY PROVIDING US WITH YOUR PERSONAL INFORMATION OR OTHERWISE USING OUR SERVICES, YOU AGREE TO THE TERMS OF THIS PRIVACY NOTICE AND OUR TERMS OF SERVICE ([link](#)).

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1. INFORMATION WE COLLECT AND USE

When we use the term “**personal information**,” we mean any information that can be used to identify you, directly or indirectly, as an individual person.

We collect your information from a variety of sources:

A. Information You Provide to Us.

We collect and use personal information you provide in the following ways:

- **Registration.** If you register for an account we may collect your contact information, username and password, date of birth, ethnicity and affiliations with religious or other institutions. We use this information to administer your account, provide you with the relevant services and information, communicate with you regarding your account, the Website and for customer support purposes.
- **Communications.** If you communicate with us through any paper or electronic form, we may collect your name, email address, mailing address, phone number, date of birth, ethnicity, affiliations with religious institutions, or any other personal information you choose to provide to us. We use this information to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization. You may also choose to communicate with other users of the Website by posting content. If you do, we will collect the content of your submission, which may be publicly displayed in our online community. If you register for our newsletters or updates, we may communicate with you by email or text message. To unsubscribe from promotional messages, please follow the instructions within our messages and review the Online Privacy Choices section below.

- **Ordering.** If you order products from our Website, we will collect your contact, shipping and billing information, including payment information, physical address and email address. We process all orders through our third party ordering and fulfillment service providers, who assist us in completing your transaction, shipping your product, communicating with you about your order, and for customer support purposes.
- **Events.** If you fill out any forms at or relating to GirlTrek events, we collect your contact and demographic information and any other information requested on the form such as your attendance at particular events. We use this information to fulfill the manage and facilitate the event and to communicate without about future events or services that may be of interest to you.

B. Information from Third Party Sources.

We may receive personal information about you from our business partners and service providers and combine this information with other data we collect from you. The third-parties may include website and service operators, payment processors, marketing partners, and shipping providers. The information may include contact information, demographic information, information about your walks and other activities, and information about your orders. We use this information to administer and facilitate our services, your orders and our marketing activities.

- **Single Sign-On.** We use single sign-on to allow a user to enter one set of login information to access multiple applications. If you create or log into your account through a third-party social media site, such as Facebook or Twitter, we may receive access to certain data and information from that site, such as your name, email address, profile picture and other information the social media site may provide to us. To learn more about the use of data collection technologies by social media sites, please visit each site's privacy policy.
- **Social Media Integration.** We may use social media platforms such as Facebook, Instagram, or Flickr to incorporate content on our Website, including information you may upload or tag us in through those platforms. To learn more about the use of data collection technologies by social media sites, please visit each site's policy page.
- **Fitness Tracker Integration.** You may ask third party fitness tracker services to integrate with your GirlTrek account and upload the results of your walks and other activities directly to us. We may receive access to this information from your fitness tracker services, but the information is maintained and controlled by the third-party service provider. You should review the third party's terms and privacy policy to learn how to manage this information.

C. Information We Collect Automatically.

We use various technologies to collect information about the device or browser you use to navigate our sites, or from your use of our services, including:

- **Web Logs.** Like many websites and email communications, we automatically collect certain information automatically and store it in log files. This information may include IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data. We then analyze patterns on our Website, manage and administer the content, improve the performance of the services, and for fraud protection and to protect our rights and the rights and safety of individuals.
- **Cookies and Other Data Collection Technologies.** We and our service providers use cookies, scripts and similar technologies to manage the sites and to collect information about you and your use of our

Website. These technologies help us to recognize you, customize or personalize your experience, advertise products or services to you and analyze the use of our Website to make it more useful to you. These technologies may also allow us to collect demographic and statistical data and provide this information to our service providers to help deliver their services. Most Internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on your Internet browser, or access <http://www.aboutcookies.org/how-to-control-cookies>. Please note, however, that disabling our cookies may mean that you will not be able to take full advantage of all of our services. For more information about our use of cookies, please visit our [Cookie Policy](#).

- **Google Analytics.** We use “Google Analytics” to collect information about your use of the Website. Google Analytics collects information such as how often users access the services, what pages they access when they do so and what other sites they used prior to using the services. Google uses the data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. To learn more about the use of data collection technologies by Google for analytics and to exercise choice regarding those technologies, please visit the [Google Analytics Opt-Out](#) browser add-on page.

D. Other Uses of Personal Information.

In addition to the uses described above, we may collect and use personal information for the following purposes:

- To create, maintain, improve, and operate the Website and services.
- To personalize your user experience.
- To communicate with you to provide technical or administrative support.
- To conduct, manage, and grow our organization.
- To analyze, research, and investigate the use of our services.
- To prevent, investigate, and provide fraud notifications, unlawful or criminal activity, unauthorized access to or use of personal information, our data system services, and to meet governmental and institutional policy obligations.
- To investigate and resolve disputes and security issues and to enforce our Terms of Service.
- For any other lawful, legitimate business purpose.

2. HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

We may share your personal information in the following ways:

- **Service Providers.** We share personal information with third-party service providers who perform services on our behalf, such as technology providers (including web platforms and hosting providers, email communications providers, analytics providers and data storage providers) and our payment and fulfillment providers for any orders you may make.
- **Partners.** At your request or for purposes consistent with this Privacy Policy, we may disclose personal information to our third-party business partners to promote their products or services, such as partner philanthropies or community partners.

- **Regulatory or Legal Requirements, Safety and Terms Enforcement.** We may disclose personal information to governmental regulatory authorities as required by law, including for tax or accounting purposes, in response to their requests for such information or to assist in investigations. We may also disclose personal information to third-parties in connection with claims, disputes or litigation, when otherwise required by law, or if we determine its disclosure is necessary to protect the health and safety of you or any other person, to protect against fraud or credit risk, or to enforce our legal rights or contractual commitments that you have made.
- **Business Transfers.** We may disclose personal information as part of an organizational business transaction, such as a merger, acquisition, joint venture, financing, or sale of organizational assets and may transfer personal information to a third-party as one of the business assets in such a transaction. We may also disclose personal information in the event of insolvency, bankruptcy, or receivership.
- **Publicly.** Please note that by creating a registering for an account, your profile information will be shared publicly with our other members. In addition, at your direction we may make other information you provide publicly available, such as if you post public comments on our sites or provide testimonials about our services. For example, with your agreement, GirlTrek may use your information as content to inspire members of the broader organization—through social media or traditional media campaigns.

3. ONLINE PRIVACY CHOICES

A. Online Advertising.

We support the self-regulatory principles of the Digital Advertising Alliance (“DAA”). We work with advertisers, advertising networks, advertising servers, and analytics companies (“Ad Partners”) that use data collection technologies to understand how our Website and services are being used and to analyze your browsing history in order to deliver advertising relevant to your interests, as well as to provide advertising-related insights. These advertisements may appear on other websites or services, including through social media networks. These Ad Partners may be able to associate devices across third party websites or services over time and link various devices used by the same individual.

For more information about how Ad Partners use the information collected by these technologies and your options for restricting cookies placed by some of these Ad Partners, please visit the [DAA’s opt-out page](#). The DAA’s opt-outs are device- and browser-specific and may not work on all devices. If you choose to opt-out through the DAA’s tools it does not mean you will cease to see advertising. Rather, the ads you see will be based on the website you are visiting and not your interests.

B. Privacy Preferences.

You have some choices regarding how we use your personal information, including the following:

- **Modifying or Deleting Your Information.** If you have questions about reviewing, changing, or deleting your information, you can contact us directly at privacy@GirlTrek.org. We may not be able to change or delete your information in all circumstances.
- **How to Control Your Email Communications Preferences.** You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. You may not opt-out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Website, technical and security notices).

- **How to Control Third Party Integrations.** You may control which third party services you have integrated with GirlTrek by accessing your account with the third party service provider and modifying the permissions you've given for sharing with GirlTrek. Please review the privacy policy of the third party service for more information.

4. CHILDREN'S PRIVACY

We do not knowingly collect or solicit personal information from children under the age of thirteen (13), nor is this website targeted towards children under the age of thirteen. In the event that we learn that we have inadvertently collected personal information from a child under age thirteen, we will delete that information as quickly as possible. If you believe that we might have received information from a child under 13, please contact us at privacy@GirlTrek.org.

5. REGION-SPECIFIC NOTICE

A. European Union, UK and Switzerland.

If you are in the European Union, the United Kingdom or Switzerland, please know that GirlTrek Incorporated is the controller of the personal information collected through the Website. Additionally, the following terms apply to the processing of your information:

i. Legal Bases.

When we process your personal information, we will rely on the following legal bases to process your personal information:

- **Legitimate Interests.** We might process your information because we have a legitimate business interest in doing so. For example, we need to use your information to provide and improve the Website, including protecting your account, facilitating community interactions, providing customer support, and helping you find members and content we think you'll like. We will hold on to this information for as long as our legitimate interests aren't outweighed by the potential risk to your right to privacy, unless we have a legal obligation to keep the information for a longer time.
- **Consent.** We may ask for your consent to use your information for specific purposes. If we do, you will have the opportunity to withdraw your consent either within the Website, through your device permissions, or by contacting us using the contact information below. We will hold on to this information for as long as we need to fulfil the purposes of your consent, unless we have a legal obligation to keep the information for a longer time.
- **Legal Obligations.** We may need to collect and use your information to comply with our legal obligations or otherwise protect our rights or the rights of third parties. For example, we may need to respond to valid legal process or take action to protect our users. We will hold on to this information as long as needed to fulfil the legal obligation or to protect our rights and those of third parties.

ii. International Transfers.

Using the Website may result in your data being transferred to and stored at facilities in the United States or other countries outside of where you live, where our services are operated, or where our third party service providers and partners are located. The data protection laws in these locations may not meet the same level of protection as in the EU, UK or Switzerland. Whenever we share information of users outside these we want our users to be aware of the risks and to understand that we strive to put in place safeguards for such transfers.

iii. Data Rights.

When we process your information, you can request access to the data we process, that we fix inaccurate information about you or that we delete your information. In some cases, you may also object to or restrict our use of your information. You may be able to exercise these rights by contacting us using the information below to request our help with exercising these rights. Please note that these rights are not absolute and certain exceptions may apply.

If you have any questions or complaints about how we handle your personal information, please contact us directly. Note that you may also file a complaint with your local supervisory authority.

6. LINKS TO OTHER WEBSITES AND SERVICES

The Website may contain integrations or links to third party websites or services, including those of our business partners. By interacting with these third parties, you may be providing information directly to the third party. You acknowledge that GirlTrek is not responsible for the privacy practices of these third parties or any entity that it does not own or control. We encourage you to review the privacy policies and online terms of those third parties to learn more about their privacy practices.

7. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the services, please contact us by:

Mail:

Privacy @ GirlTrek
1800 Wyoming Ave NW
Floor 2
Washington, D.C. 20009

Email: privacy@GirlTrek.org

8. CHANGES TO OUR PRIVACY POLICY

This Privacy Policy is subject to occasional revisions. GirlTrek will update this Privacy Policy on the Website, including the effective date at the top, in a timely manner if anything is updated or changed. We encourage you to check this page periodically to stay informed about how we are processing personal information.

