

That Can Be Me, Inc. Privacy Policy

Please read this Privacy Policy carefully before using our websites located at www.booksatwork.org or www.thatcanbeme.org (together referred to as “Websites”) or participating in the Books@Work program (“B@W”).

Your privacy is important to That Can Be Me, Inc. (“TCBM”), a nonprofit organization that provides B@W. This privacy statement provides information about the personal information that TCBM collects and how TCBM uses that personal information.

Information that we collect and how we use it

- **We collect personal information such as your name, email address(es), and location information.** We may also collect your workplace address, phone number(s), credit card information, and other information to facilitate B@W programs. The party engaging TCBM to provide B@W may provide us with your name, email address, and workplace location so that we may contact you with details about an upcoming B@W program. We will never sell your personal information.
- **We use third-party vendors to deliver our newsletter, provide program surveys, process credit card donations and payments for B@W programs, and help us administer B@W.** We never see, hold, or store your credit card payment details. Credit card payments are handled by First Data Global Gateway and donations are processed by Stripe. Other third-party vendors include Google G-Suite, MailChimp, SurveyMonkey, Google Analytics, Salesforce, Evernote, PayPal, and PNC Bank.
- **We may obtain some personal information regarding you from your voluntary interaction with TCBM or B@W on social media websites.** In order to keep your personal information accurate and up-to-date, or to delete any personal information, you will need to manage that through your social media account. We do not have the ability to modify or delete personal information you voluntarily disclose through your interaction with TCBM or B@W on social media websites.
- **You can voluntarily submit personal information.** If you respond to optional program surveys, you may provide additional personal information as you flesh out your survey responses.
- **We may share your personal information with business partners, service vendors, authorized third-party agents or contractors in order to provide B@W.** We only provide these third parties with the minimum amount of personal information necessary to fulfill a legitimate purpose related to the facilitation of the B@W program and/or other lawful purpose. The third parties are not permitted to use your personal information except for these purposes.



- **We may provide aggregated, but anonymized information and analytics to third-parties.** Before we make any disclosure of aggregated, anonymized information and/or analytics, we will use reasonable efforts to make sure it does not identify you.
- **The internet comes with a footprint.** Web servers may automatically capture the following information from visitors to our Websites, including the name of the domain and host from which you access the internet, the internet address of the website from which you enter the Websites, the pages you visit on the Websites and the amount of time you spend on the Websites. This visitor information may be used to improve the Websites.
- **We use the information we gather to ...** deliver, support and improve our services; gather feedback to gauge satisfaction with B@W and to shape and refine further programmatic offerings; perform administrative tasks; provide reports based on information collected; to meet contractual obligations; send you a newsletter and other updates about TCBM and B@W; send you statements and invoices; collect and process payments; send you marketing and other emails, and contact you for legitimate purposes related to the facilitation of the B@W program and/or other lawful purposes.

Legal Basis for Collection of Information

TCBM asserts the following legal grounds for the collection of data:

- **Explicit Consent** — When you sign up for the newsletter, take an optional SurveyMonkey survey, or participate in a B@W program, you provide explicit consent for TCBM to collect the above listed personal information.
- **Contract** — If you enter an agreement with TCBM for the provision of services in exchange for payment, TCBM will be required to collect the above listed personal information.
- **Legitimate Interests** — Finally, TCBM may have additional legitimate interests, including account maintenance and administrative purposes, for the collection of the above listed personal information.

Disclosure of information

We will not voluntarily share your personal information provided via the Websites to any third party, except:

- With third parties that we hire to perform services for us (these third parties are not authorized to keep or use your personal information for any other purpose);
- To comply with legal requirements, such as law, regulation, warrant, subpoena, court order, or with a regulator or law enforcement agency or personnel;
- In connection with a corporate sale, merger, reorganization, acquisition, dissolution or similar event; and/or
- To fulfill a legitimate purpose related to the facilitation of the B@W program and/or other lawful purpose.

Personal information described above under “Information that we collect and how we use it” may be provided to third parties as described in this Privacy Policy.

Data Transfer

That Can Be Me, Inc. is based in the United States. Personal information that we collect may be transferred to, and stored at, any of our affiliates, partners, third parties or service providers which may be inside or outside the European Economic Area (“EEA”) and Switzerland, including the United States, in accordance with this Privacy Policy. By submitting your personal data, you agree to such transfers. Your personal information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information. If we transfer or disclose your personal information to affiliates, partners or service providers in other countries, we will protect that information as described in this Privacy Policy.

Data Retention

We retain personal information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data.
- Whether the data is necessary to provide or improve our services.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible, then we will securely store your personal information and isolate it from any further processing until deletion is possible.

All personal information collected via or by TCBM may be stored anywhere in the world, including but not limited to, the United States, the European Union, in the cloud, on our servers or computers, on the servers of our affiliates or the servers of our third-party vendors or service providers.

Your choices and access

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request.

Those who have opted in to TCBM marketing emails can opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link at the bottom of our marketing messages.

Also, all opt-out requests can be made by emailing us at info@thatcanbeme.org. Please note that some communications, such as emails related to your participation in a B@W program or collection of payments, are considered transactional and necessary for providing B@W to you. Individuals cannot opt out of these messages unless you completely withdraw your participation in B@W. Please email info@thatcanbeme.org for more information.

Links to other websites

We do not endorse and are not responsible for the information practices or privacy policies of any other web sites that may be linked to or from the Websites. If you decide to access any other web site that may be linked to or from the Websites, you should consult that web site's privacy policy.

Securing Your Data

TCBM takes appropriate and reasonable technical and organizational measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Please be aware that no security measures are perfect or impenetrable. We cannot guarantee that information about you will not be accessed, viewed, disclosed, altered, or destroyed by breach of any of our reasonable technical and organization measures.

Cookies

A cookie is a small text file that the Websites can place on your computer's hard drive. When you visit the Websites, a cookie may be placed on your computer for customizing and enhancing your experience on the Websites. Your name and email address are not shared in this cookie. We use a cookie that collects anonymous traffic data. You can set your web browser to block cookies, but doing so may affect your ability to access certain features of the Websites.

Do-Not-Track Technology

Currently, various browsers — including Internet Explorer, Firefox, Chrome and Safari — offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to websites visited by the user about the user's browser DNT preference setting. We do not currently respond to browsers' DNT signals with respect to the Websites.

Security

We take reasonable steps to protect personal information from loss and misuse. Please keep in mind that no Internet transmission is 100% secure. Some emails sent to or from the Websites may not be secure. Please consider this when sending information to us by email.



Children's Privacy

The Websites are not intended for use by children under the age of 13. We will not knowingly collect personal information from them. If we discover that a child has provided us with personal information, we will use reasonable efforts to delete this information. If you have reason to believe we may have accidentally received personal information from a child under the age of 13, please immediately email us at info@thatcanbeme.org.

Changes to this Privacy Policy

We may modify, alter or update this Privacy Policy at any time. We will not provide individual notice to you of changes to this Privacy Policy, but when we make updates to this Privacy Policy, we will update the date in this section.

Contact Us

If you have any inquiries about this Privacy Policy or its implementation, you may contact us at info@thatcanbeme.org.

Or by mail at:

That Can Be Me, Inc.

19513 Shaker Boulevard

Cleveland, Ohio 44122 USA

This Privacy Policy was last updated on June 8, 2018.