# Leadership for Educational Equity Privacy Policy

Effective Date May 30th, 2024

# **Scope of this Policy**

This privacy policy applies to:

- Leadership for Educational Equity ("LEE," "we," "us," "our").
- LEE's online properties, including our websites and websites or mobile applications that link to it and our social media pages or handles (collectively, the "Services").
- LEE's products and services.

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

# **Information We Collect**

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services with other information we obtain from our records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or deidentify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

# Information you give us

You may provide the following information to us directly:

- Contact and professional information, including name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information, including recordings of online events.
- Payment information for processing donations, including credit card information.
- Content you may include in survey responses.
- Information contained in your communications to us.
- Information you make available to us via a social media platform.
- Information you submit to inquire about or apply for a job with us.
- Information you include in your listing in the LEE member directory. Please be aware that any information you post may be viewable by other LEE members, and LEE is not responsible for and cannot control its members' use of such information.
- Any other information you submit to us.

# Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- Device information, including IP address, device identifiers, and details about your web browser.
- Analytical information, including details about your interaction with our website and electronic newsletters.
- Diagnostic information, including web traffic logs.
- Advertising information, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- Business record information, including records of your donations.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner's privacy practices.

Partner	Information Type Collected
<u>AddThis</u>	Device information, Analytical information,
	Advertising Information
<u>Facebook</u>	Device information, Analytical information,
	Advertising Information
Google Analytics	Device information, Analytical information,
	Advertising Information, Diagnostic Information
<u>Hotjar</u>	Device information, Analytical information,
	Advertising Information
Pardot (Salesforce)	Device information, Analytical information
<u>Twitter</u>	Device information, Analytical information,
	Advertising Information
TypeKit (Adobe)	Device information, Analytical information

### **Information We Collect From Other Sources**

We may collect the following information about you from third-party sources.

- Contact information, demographic information, and information about your interests and purchases, from consumer data providers and organizational partners.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.
- If you decide to invite others to the Services, we will collect your and the other person's names, email addresses, and/or phone numbers to send an email or text message and follow up with the other person. You agree that you will obtain the other person's consent before giving us the other person's contact information. You also agree that you will not send us the contact information of a minor. We will inform any other person you invite that you gave us that other person's information in the invitation email.

### **How We Use Your Information**

We may use any of the information we collect for the following purposes.

- Service functionality: To provide you with our services, including to facilitate account registration, offer
  our membership services, process donations, send service and policy-related communications, administer
  surveys, and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement**: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our membership base and purchasing trends, and the effectiveness of our marketing.
- **Personalization**: To offer you recommendations and tailor the Services to your preferences.
- Advertising and marketing: To send you marketing communications and measure the effectiveness of our advertising. We may share your information with online advertising partners and social media platforms for this purpose.
- **Security**: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance**: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

# **How We Share Your Information**

We may share any of the information we collect with the following recipients.

- **Service providers**: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
  - Supporting Service functionality, such as vendors that support event registration, customer surveys, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email).
  - o Auditing and accounting firms, such as firms that assist us in the creation of our financial records.
  - o *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
  - Analytics and marketing services, including entities that analyze traffic on our online properties and assist with marketing efforts.
  - Security vendors, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
  - o *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
  - Marketing vendors, such as entities that support distribution of marketing emails.
- Organizational partners: We may share your contact information with other organizations. For
  example, LEE may share information with the Leadership for Educational Equity Foundation, other
  organizations whose participants or members may participate in LEE, organizations and government
  agencies who host LEE members as fellows, and organizations who receive your donations via the
  Services. When we disclose information to non-LEE entities, we execute data sharing agreements
  with those organizations and agencies.
- **Social media platforms**: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook "like" button), both the platform and your connections on

- the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement**: We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- Other businesses in the context of a commercial transaction: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

# **Security**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information and require vendors we contract with to use similar precautions, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

# **Your Options and Rights Regarding Your Information**

**Your Account**: Please visit your member profile to update your account information.

**Marketing Message Unsubscribe**: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications. You may also unsubscribe from text messages by replying "STOP" to Leadership for Educational Equity text messages (standard text messaging rates apply) or by updating your communications preferences in your member profile.

**Ad Choices**: You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device
  may give you the option to disable advertising functionality. Because we use cookies to support Services
  functionality, disabling cookies may also disable some elements of our online properties.
- The following industry organizations offer opt-out choices for companies that participate in the industry organizations: the <a href="Network Advertising Initiative">Network Advertising Initiative</a>, the <a href="Digital Advertising Alliance">Digital Advertising Initiative</a>.

  Interactive <a href="Digital Advertising Initiative">Digital Advertising Initiative</a>.
- You may use our cookie settings menu.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track**: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy, whether a Do Not Track signal is received.

**Jurisdiction-specific rights**: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

# **Special Information for Job Applicants**

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

# **Other Important Information**

#### **Data** retention

We may store information about you for as long as we have a legitimate business need for it.

### Cross-border data transfer

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

# Information about children

The Services are intended for users age thirteen and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

# Sharing of Medical or Health Information

To the extent that we receive protected health information about you, that information is subject to electronic disclosure to the extent permitted by applicable law.

# **Privacy Disclosures for Specific Jurisdictions**

# California

# Your California Privacy Rights; "Shine the Light" Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. We do not share your personal information with third parties for those third parties' direct marketing purposes.

# Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

# **Contact information**

# **Contact**

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: Privacy LEE@educationalequity.org

Telephone: (202) 734-3716

Mail: 25 Broadway, 13th Floor, New York, NY 10004