

Easter Seals VT Inc.

PRIVACY POLICY

1. SCOPE OF THIS PRIVACY POLICY

Easter Seals VT, Inc. ("us", "we" or "our") is committed to protecting the privacy of the individuals about whom we collect personal information ("user", "you" or "your"). This privacy policy ("Privacy Policy") is designed to assist you in understanding how we collect, use, share, safeguard, retain and destroy personal information you may provide to us or that we collect from or about you from other sources. "Personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, or in some cases a household (e.g., under the CCPA, where applicable).

2. DETAILS ABOUT THE PERSONAL INFORMATION WE COLLECT

In the chart below, we discuss the categories of personal information we collect (including identifying types of information we may collect within each of the categories), the categories of sources we obtain that personal information from, our business or commercial purpose(s) for collecting and using the personal information, the categories of service providers and/or third parties to whom we disclose personal information for a business or commercial purpose, and the business or commercial purpose(s) for disclosing personal information. We have endeavored to identify the various specific types of personal information we collect within each of the categories of personal information in the chart. Please note that the columns addressing the categories of sources we obtain that personal information from, our business and commercial purpose(s) for collecting and using the personal information, the categories of service providers and/or third parties to whom we disclose personal information for a business or commercial purpose, and the business or commercial purpose(s), and the business or commercial purpose(s) for disclosing personal information apply to a given category as a whole, and not necessarily to any specific type of personal information within that category. Therefore, in a given category, there might be more reasons why we collect some types of specific personal information as opposed to other types.

Please note that we do not sell your personal information. We endeavor to only retain your personal information for as long as necessary for the purposes for which we collect it or as otherwise required under applicable law or by specific agreements with or that relate to you. When we no longer need the personal information, we will destroy it (including erasure where applicable) securely and safely.

In Section 3 below, we provide more detail about information collected through online technologies, including a discussion about cookies and any other similar technologies that we and/or our service providers may use with regard to collecting personal information.

Categories of personal information collected about individuals	Categories of sources from which the personal information is collected (including directly from the individuals)	Business or commercial purpose(s) for collecting and using the personal information	Categories of service providers and/or third parties to whom we disclose personal information for a business or commercial purpose	Business or commercial purpose(s) for disclosing personal information
<p>(A) Identifiers, such as:</p> <p>Legal Name Alias Physical Address Mailing Address Telephone Numbers Email Addresses Social Security Number Driver’s License/State ID #/Permit Information Date of Birth</p> <p>Internet Protocol address (IP Address) – <i>see category F</i></p>	<p>Individual directly and/or individual family members or authorized representatives</p> <p>Government authorities, institutions, agencies and third-party school districts</p> <p>On-line employment services providers</p> <p>On-line and social networking advertising providers</p> <p>Employment screening services</p> <p>Third party healthcare providers and insurers</p> <p><i>see category F</i></p>	<p>To enable correspondence with you, a family member or an authorized representative</p> <p>To provide services to you or a family member</p> <p>To receive or solicit donations</p> <p>For payment purposes</p> <p>To send newsletters and other publications</p> <p>For marketing, business development, and advertising</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p> <p><i>see category F</i></p>	<p>Government authorities, institutions, agencies and third-party school districts</p> <p>Web hosting and other applications service providers</p> <p>On-line employment service providers</p> <p>Employment screening services</p> <p>Third party healthcare providers and insurers</p> <p>Third party billing and payment processors</p> <p><i>see category F</i></p>	<p>To enable correspondence with you, a family member or an authorized representative</p> <p>To provide services to you or a family member</p> <p>For payment services</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p> <p><i>see category F</i></p>

<p>(B) Any categories of personal information concerning customer records, such as:</p> <p>Legal Name Alias Signature Physical Address Mailing Address Telephone Numbers Email Address Social Security Number Driver’s License/State ID # Date of Birth Payment Information (Bank Account/Credit and or Debit Card) Personal Account/Expense Information Billing Information Health Insurance Information Medicaid/Medicare (UID) Information Medical and Mental Health Information Criminal Records Education History Employment History Family Services Vehicle Information Military History</p>	<p>Individual directly and/or individual family members or authorized representatives</p> <p>Government authorities, institutions, agencies and third-party school districts</p> <p>On-line employment services providers</p> <p>Employment screening services</p> <p>On-line and social networking advertising providers</p> <p>Third party healthcare providers and insurers</p>	<p>To enable correspondence with you, a family member or an authorized representative</p> <p>To provide services to you or a family member</p> <p>To receive or solicit donations</p> <p>To send newsletters and other publications</p> <p>For marketing, business development, and advertising</p> <p>For payment purposes</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p>	<p>Government authorities, institutions, agencies and third-party school districts</p> <p>Web hosting and other applications service providers</p> <p>On-line employment service providers</p> <p>Employment screening services</p> <p>Third party healthcare providers and insurers</p> <p>Third party billing and payment processors</p>	<p>To enable correspondence with you, a family member or an authorized representative</p> <p>To provide services to you or a family member</p> <p>For payment services</p>
<p>(C) Characteristics of protected classifications under applicable law (that is, particular characteristics shared by groups of people that result in special protection under the applicable law, such as:</p> <p>Age Race/Color</p>	<p>Individual directly and/or individual family members or authorized representatives</p> <p>Government authorities, institutions, agencies and third-party school districts</p>	<p>To provide services to you or a family member</p> <p>For marketing, business development, and advertising</p> <p>For payment purposes</p>	<p>Government authorities, institutions, agencies and third-party school districts</p> <p>Web hosting and other applications service providers</p> <p>Employment screening services</p>	<p>To provide services to you or a family member</p> <p>To provide leave and benefit assistance</p> <p>For payment services</p>

<p>Religion National Origin Guardianship Dates of Custody (DCF) Adoption Records Sex/Gender (including pregnancy) Criminal Records Sexual Orientation Housing status Marital Status Family Status (including parenting) Medical and Mental Health Accommodations Medical and Mental Health Diagnoses Citizenship Mental Health Military/Veteran Status Federally Recognized Tribe</p>	<p>On-line employment services providers On-line and social networking advertising providers Employment screening services Third party healthcare providers and insurers</p>	<p>For reporting to government and third-party agencies</p>	<p>Third party healthcare providers and insurers Third party billing processors</p>	
<p>(D) Commercial information, such as: Records of Services Obtained</p>	<p>Individual directly and/or individual family members or authorized representatives Government authorities, institutions, agencies and third-party school districts Third party healthcare providers and insurers</p>	<p>To provide services to you or a family member For marketing, business development, and advertising For payment purposes For reporting to government and third-party agencies</p>	<p>Government authorities, institutions, agencies and third-party school districts Third party healthcare providers and insurers Third party billing processors</p>	<p>To provide services to you or a family member, or marketing For payment services</p>
<p>(E) Biometric information, such as: Signature Sleep, Health or Other</p>	<p>Individual directly or authorized representatives</p>	<p>To enable correspondence with you, a family member or</p>	<p>Government authorities, institutions, agencies and third-party school districts</p>	<p>To enable correspondence with you or a family member</p>

<p>Exercise Data Body Temperature</p>	<p>Third party healthcare providers and insurers</p>	<p>authorized representative</p> <p>For coordination of care</p> <p>For payment purposes</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p> <p>For marketing, business development, and advertising</p> <p>For health and wellness benefits</p> <p>For the overall health and safety of our staff, clients and visitors</p> <p>For reporting to government and third-party agencies</p>	<p>Third party healthcare providers and insurers</p> <p>Third party payment processors</p> <p>Employment service providers</p> <p>Employment screening services</p>	<p>For coordination of care</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p> <p>For payment services</p> <p>Evaluation and/or relocation of services</p>
<p>(F) Internet or other electronic network activity information, such as:</p> <p>IP Addresses Log Data Social Media Activity</p> <p>E-mail addresses – <i>see categories A and B</i></p>	<p>Direct contact from individuals accessing our web platform through internet activity</p> <p>E-mail addresses – <i>see categories A and B</i></p>	<p>For security reasons</p> <p>For legal purposes and/or performance information</p> <p>E-mail addresses – <i>see categories A and B</i></p>	<p>Web hosting provider</p> <p>E-mail addresses – <i>see categories A and B</i></p>	<p>For web hosting</p> <p>For assistance with web site and computer systems security</p> <p>E-mail addresses – <i>see categories A and B</i></p>
<p>(G) Geolocation data, such as:</p>	<p>On-line and social networking</p>	<p>For marketing, business</p>	<p>Third party auto insurers</p>	<p>For insurance purposes</p>

Country Town/City State	<p>advertising providers</p> <p>Web hosting and other applications service providers</p> <p>Through tracking devices installed on our organization's vehicles</p> <p>Data analytics providers</p>	<p>development, and advertising</p> <p>For the overall health and safety of our staff and clients</p>		
<p>(H) Audio, electronic, visual, thermal, olfactory, or similar information, such as:</p> <p>Voice Recordings Photographs Video Recordings</p>	<p>Individual directly and/or individual family members or authorized representatives</p> <p>Through security devices such as cameras</p>	<p>For marketing, business development, and advertising</p> <p>For carrying out security</p> <p>development and implementation of programs</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p>	Third party healthcare providers	For coordination of care/ development and implementation of programs
<p>(I) Professional or employment-related information, such as:</p> <p>Applications Resumes Social Sec. Number Driver's License Physical/Mailing Address Background Checks IRS Information (such as w-4 and w-2) Bank Account Information Health Screenings</p>	<p>Individual directly and/or individual family members or authorized representatives</p> <p>Government authorities, institutions, agencies and third-party school districts</p>	<p>To enable correspondence with you, a family member or authorized representative</p> <p>For payment purposes</p> <p>For entering into and carrying out employment, volunteerism, and</p>	<p>Government authorities, institutions, agencies and third-party school districts</p> <p>Third party healthcare providers and insurers</p> <p>Third party billing and payment processors</p>	<p>To enable correspondence with you or a family member</p> <p>For entering into and carrying out employment, volunteerism, and internship relationships</p>

AGE RESTRICTIONS; CHILDREN UNDER THE AGE OF 13; NOTICE TO PARENTS AND LEGAL GUARDIANS

While we offer services to children of all ages, we do not market or intend to solicit individuals under the age of 13. We do knowingly collect personal information from children under age 13 in order to provide program services. We take children's privacy seriously, and encourage parents to play an active role in their children's online experience at all times.

3. PERSONAL INFORMATION WE COLLECT THROUGH INTERNET ACTIVITIES

In order for you to register as a user and access certain portions of our Site, and our online services (including any mobile applications and social media networks/pages), and if you communicate with us by e-mail or otherwise complete online forms or the like, we may obtain your IP address and require you to provide us or our authorized service providers with information that personally identifies you as described in the chart in Section 2 above, including any account number that we assign to you which may be retained and used by us as described in this Privacy Policy.

You may choose not to provide us with any personal information. In such an event, you will not be able to access or use those portions of the Site or services or participate in certain online activities that require your personal information. You may still use the Site to browse information about the Site and services.

Cookies and Similar Technologies

Cookies are small text or data files that are placed on your computer or other device that you use to access our Site. Cookies provide a sort of memory for web pages. Below is a general description of cookies and why and how we and/or our analytics service providers use them.

- a. Necessary Cookies:** These cookies are necessary to provide use of a website.
- b. User Experience Cookies:** These cookies improve/enhance your user experience of a website by enabling the site to remember information that changes the way the site behaves or looks, such as by setting your language preference, remembering your name or location, keeping you logged in, or providing enhanced or more personalized features. Please note that where you specifically request the relevant function that requires such cookies, that processing typically is treated as necessary.
- c. Analytical Cookies:** These cookies collect information about your use of a website to analyze certain of your activities to help with understanding how visitors interact with the site, including estimating the number of unique visitors to the site and to specific pages within the site, to detect the most preeminent search engine keywords that lead to the site and to specific pages within the site, to identify site navigation issues, and to see how visitors move around the site.

- d. Marketing Cookies:** These cookies are used to track site visitors/users across third-party websites, including tracking browsing habits such as what pages a visitor/user visits, what items are viewed and how many times, and to display ads and provide focused advertising for goods or services that might be relevant or of interest to the particular visitor/user.

Cookies may be distinguished by who is setting the cookie on your device when you visit a website. A "first party cookie" refers to cookies set by us as the controller or operator of the site or a processor acting on its behalf. On the other hand, a "third party cookie" refers to cookies that are set by other controllers that do not operate the particular site. Also, cookies are sometimes characterized by their duration. A "session cookie" is a cookie that is automatically deleted from your computer or device when you close your browser, whereas a "persistent cookie" is a cookie that remains stored in your computer or device until a defined expiration date and/or until you take steps to remove. You may be able to adjust your cookies preferences and even remove and disallow cookies through your browser settings.

We obtain aggregated, deidentified information from our analytics providers, through the use by them of technologies such as cookies, regarding the use of our Site which may include any of the following: (i) the number of unique and/or active users on our Site, (ii) the country where our Site visitors browse our website from, (iii) access times, times spent, and Site pages visited, (iv) operating systems and/or device type (*e.g.*, desktop or mobile) of visitors to our Site (v) browser types, (vi) how Site visitors are acquired in terms of organic web searches, directly using our website URL, or third party referrals or hyperlinks; (vii) and certain aggregated demographic information such as age range and gender. Such information may be collected from your computer, tablet, mobile phone or other device used to access the Site and/or certain services, as well as related software, when you visit the Site. Presently, we utilize third party vendors, such as Google Analytics. You can read about Good Analytics' use of cookies and other technologies in connection with its analytic activities here:

<https://support.google.com/analytics/answer/6004245?hl=en>. You can also reach about Google Analytics privacy practice here: <https://policies.google.com/privacy?hl=en-US>.

We participate in various social media services, such as Facebook, LinkedIn, Instagram, Twitter and YouTube. We do not control, nor are we responsible, for their personal information collection and use practices, including sharing of personal information they collect. You should review the privacy policies of any social media sites you access to understand their practices with regard to your personal information.

You may be able to adjust your cookies preferences and even remove and disallow cookies through your browser settings. While you may be able to adjust your browser settings to remove Necessary Cookies, these cookies are not optional if you wish to use the features of the Site or

services to which they relate. While the other cookies identified above are optional, we recommend their use in order to provide certain benefits to you.

4. ADDITIONAL DETAILS ABOUT OUR SHARING OF PERSONAL INFORMATION

Except as otherwise provided in this Privacy Policy, or any agreements you enter into with us, we will keep your personal information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with applicable laws, regulations, rules and the like, or legal process served on us; (b) provide you the products, services and/or information that you have requested; (c) protect our rights and/or property; (d) enforce our rights; (e) protect the interests of other users of the Site, our mobile applications, our social medial sites, and/or our services, or any other person; (f) operate or conduct maintenance and repair of our equipment; and/or (g) detect, prevent and/or otherwise address fraud, security or technical issues, as authorized by law.

In general, we will use personal information only for the purpose for which such information was provided to us, including providing support, services or products as applicable. We may also use personal information to (a) to verify the information you provided to us; (b) to provide you with the information that you have requested; (c) to respond to your inquiries; (d) to contact you when necessary; (e) to send you information about us, including information related to our products, services, programs or promotional activities, or about third party products, services, programs or promotional activities that may be of interest to you. If you sign up or subscribe to our newsletter(s) or publications, we will use your name and e-mail address to send the newsletter(s) or publications to you.

We may share your personal information with our affiliates (where applicable), and with service providers that provide services to us and/or our affiliates (including, handling and delivering of e-mail communications and publications, payment processing, user submitted information processing and/or storage, and website hosting) as reasonably necessary for them to provide those services.

Notwithstanding any of the foregoing, we may transfer, sell or assign information concerning the Site and/or services (including, but not limited to, the Service) and your use of the Site and services, including without limitation, personal information, to third parties, as a result of the sale, merger, consolidation, change in control, transfer of substantial assets, or reorganization or liquidation of us.

a. Submissions

Any and all information or material, including any personal information, you transmit, post or upload to or through the Site by or to message boards, chat rooms or similar discussion forums, blogs, wiki pages or otherwise ("Submissions") can be read, collected, or used by other users of

these forums, and could be used to send you unsolicited messages or for other purposes. We are not responsible for the personal information or other information you choose to submit in Submissions.

We participate in various social media services, such as Facebook, LinkedIn, Instagram, Twitter and YouTube. We do not control, nor are we responsible, for their personal information collection and use practices, including sharing of personal information they collect. You should review the privacy policies of any social media sites you access to understand their practices with regard to Submissions.

5. HOW WE PROTECT PERSONAL INFORMATION WE COLLECT

We have put in place security measures intended to protect the personal information we process. We take reasonable administrative, technical, and physical measures to safeguard against unauthorized access to, use, alteration, disclosure and transfer of, and accidental loss or alteration of, the personal information we collect.

Unfortunately, no data transmission over the Internet or method of storage can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or from our Site and services, and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure security on our systems.

6. THIRD PARTY LINKS

Our Site and/or services may contain links to third-party websites. If you access any third-party website links, you will leave the Site and services. We do not control those sites or their privacy practices, which may differ from our practices. We are not responsible for the privacy practices or content of linked third party sites. We do not make any warranty or representation regarding, nor do we endorse, any such websites or the information or content appearing thereon or any of the products or services described therein, or the accuracy of the same. The personal information you choose to provide to or that is collected by these other parties is not covered by our Privacy Policy. We encourage you to review the privacy policy of any third party before submitting your personal information. If you decide to access linked such websites, you do so at your own risk.

7. DO NOT TRACK

Some browsers allow you to automatically notify websites you visit not to track you, by using a "Do Not Track" signal. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. We do not honor requests for or respond to Do Not Track signals/requests. Additionally, we may collect user information about your online activities over time and across different websites, or authorize

third parties to do so. To find out more about "Do Not Track," you may wish to visit www.allaboutdnt.com.

8. OPT-OUT/UNSUBSCRIBE

If you sign up/subscribe to our newsletter(s) or other publications (if any) and you no longer wish to receive the same, you may unsubscribe by following the opt-out/unsubscribe link located within each newsletter or other publication, or by contacting us at: 1 (802) 622-3230 or via e-mail at infoVT@eastersealsVT.org.

If you do not wish to receive information or other material from us other than newsletter(s) or publications, you may "opt-out" of receiving these communications by contacting us at: 1 (802) 622-3230 or via e-mail at infoVT@eastersealsVT.org.

9. CORRECTIONS; UPDATES

If you wish to change or modify information that you previously provided to us, you may do so by sending us an e-mail at: infoVT@eastersealsVT.org.

We will use reasonable efforts to ensure that your information is corrected or updated in our records.

10. TRANSFER OF PERSONAL DATA ABROAD

If you utilize our services from a country other than the country where our servers are located, your communications with us may result in transferring your personal data across international borders. Additionally, your personal information may be shared with our service providers, which could involve the transfer of your personal information across international borders.

11. CHANGES TO PRIVACY POLICY

We may change our Privacy Policy at any time by updating this posting. Changes to our Privacy Policy will be effective when posted and the new effective date will be identified. If we have referenced this Privacy Policy in connection with a contract with you that requires other specific means of providing you notice of changes to the Privacy Policy, we will provide notice to you as required by the contract.

12. CONTACT US

For more information about our privacy practices, or if you have questions or concerns regarding our Privacy Policy, our privacy practices, or about the security at our Site and services, you may contact us in one or more of the following ways:

Mail:

Easter Seals VT, Inc.
Attn: Compliance Officer
555 Auburn Street, Manchester, NH 03103
Email address: ComplianceVT@eastersealsvt.org
Toll free telephone number: 1 (888) 840-4243

13. EFFECTIVE DATE OF PRIVACY POLICY

This Privacy Policy is effective as of **XXXX XXXX XXXX** and supersedes and replaces any prior Privacy Policy.