

YMCA OF THE USA PRIVACY NOTICE

Overview & Purpose

The National Council of Young Men’s Christian Associations of the United States of America (“YMCA of the USA”) is committed to respecting your privacy. This Privacy Notice describes how YMCA of the USA collects, uses, discloses, stores and otherwise processes information. In addition, this Privacy Notice states how you can control the collection, use, correction, and deletion of your information.

We urge you to read this Privacy Notice so that you understand our commitment to you and your privacy.

Scope

This Privacy Notice applies to personal information and other information collected by YMCA of the USA or its service providers from or about:

- visitors to, or users of, its websites;
- YMCA associations using YMCA of the USA hosting and information technology services;
- users of any mobile-device applications that YMCA of the USA offers (such as its iOS and Android applications);
- service providers, affiliates, and partners;
- job applicants; and
- other third parties that it interacts with.

This Privacy Notice does not apply to Personal Health Information (“PHI”) collected through the YMCA Diabetes Prevention Program or any other program covered under the Health Insurance Portability and Accountability Act.

Data We Collect

YMCA of the USA collects data from you through your interactions with us. You provide some of this data directly, and we obtain some of it by collecting data when you use our services. The data we collect depends on the context of your interactions with YMCA of the USA and the choices you make, including your privacy settings and the activities you participate in. We also obtain data about you from third parties.

Personal Information

YMCA of the USA collects Personal Information about you in connection with many of our services. You may provide Personal Information to YMCA of the USA in person or on a website

or mobile application operated, provided or otherwise controlled by YMCA of the USA. You may provide Personal Information to YMCA of the USA such as your name, home address, e-mail address, telephone number, date of birth, demographic information, credit card information, sex-offender status, YMCA membership status, or emergency contact information, in connection with certain activities, including but not limited to:

- registering for, or participating in, events, classes, and other activities or programs offered by YMCA of the USA;
- registering for surveys, forums, content submissions, chats, bulletin boards, discussion groups, requests for suggestions, or other services or activities offered on our website;
- participating in YMCA Nationwide Membership;
- providing payments and donations;
- communicating with YMCA of the USA via phone, online chats, e-mails, web forms, social media and other methods of communication;
- subscribing to YMCA of the USA marketing material;
- applying for a job; or
- providing services to YMCA of the USA.

By providing your Personal Information to YMCA of the USA in the ways described in this Privacy Notice, you agree that you are authorized to provide that information and are accepting this Privacy Notice and any supplementary privacy statement that may be relevant to you. If you do not agree to our practices, please do not register, subscribe, create an account or otherwise interact with our services, YMCA of the USA's websites or mobile-device applications.

Non-Personal Information

We may also collect information that is related to you but that does not personally identify you ("Non-personal Information"). Non-personal Information also includes information that could personally identify you in its original form, but that we have modified (for instance, by aggregating, anonymizing or de-identifying such information) in order to remove or hide any Personal Information.

Automatically Collected Technical Information

YMCA of the USA may also collect information about you when you visit our websites, which your web browser automatically sends whenever you visit a website on the Internet ("Technical Information"). Technical Information is information that does not, by itself, identify a specific individual but which could be used to indirectly identify you. Our servers automatically record this information, which may include your Internet Protocol ("IP") address, browser type, browser language and other information about your web browser, type of device (including mobile device) used to access our website, and the date and time of your request. Gathering Technical Information helps us ensure our websites and other services work correctly and support our operational analytic efforts. We may collect information automatically through the following:

- A "Cookie," a small dataset that we transfer to your computer so that we can keep track of your interests and/or preferences and recognize you as a return visitor to the websites;

- “Clear GIFs,” sometimes called “web beacons,” which are small images placed on a web page or in an e-mail message. We use clear GIFs to monitor user behavior, deliver cookies, collect information, count visits, understand usage and campaign effectiveness, and to tell if a recipient has opened and acted upon an e-mail;
- “Log Files,” which record website activity on our services and enable us to gather statistics about our users' browsing habits. These entries help YMCA of the USA determine (among other things) how many and how often users have accessed or used our services, which pages they have visited and other similar data;
- Marketing E-mail Communications where we use pixel tags and cookies so that we can track your interaction with those messages, such as when you open the e-mail or click a URL link that is embedded within them. When recipients click on one of those URLs, they pass through a separate web server before arriving at the destination page on a company website; or
- Mobile Communications when you download or use our mobile-device applications, or access one of our mobile-optimized websites, we may receive information about your mobile device, including a unique identifier for your device.

Social Media Applications/Networking Websites

Our websites include social media features, such as the Facebook Like button and other widgets that run on our site. These features may collect your IP address and which page you are visiting on our site and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the organization providing it. For example, if you create or log into your account through a third-party social networking site, we may have access to certain information from that site, such as your name, account information and friends, in accordance with the authorization procedures determined by such third-party social networking site.

Third Party Service Providers, Affiliates, and Partners

In order to provide our services and improve YMCA of the USA’s websites, we may obtain information from third parties. For instance, YMCA associations program and participant data, and other information from our third-party service providers, affiliates, and partners, as such data can improve the accuracy and relevance of marketing.

Publicly Available Information

YMCA of the USA may collect data that is publicly available. For instance, information you have submitted in a public channel (e.g., blog, forum, social network) may be read, collected and may be used to enhance our services.

How We Use Your Data

YMCA of the USA uses your Personal Information to provide you with activities and services or to help us enhance our services to you. We also use your Personal Information to support our operational functions, such as data protection, marketing and legal functions. To do this, we combine Personal and Non-personal Information, collected online and offline, including information from third-party sources.

- **Communications:** We may use your Personal Information to respond to reviews, comments or other feedback that you provide to us.
- **Employment Applications:** In connection with a job application or inquiry, you may provide us with data about yourself, including your educational background or resume and other information, where required or permitted by law. YMCA of the USA may use this information for the purpose of employment consideration.
- **Enhance Offerings:** YMCA of the USA uses your Personal Information to help us enhance our service offerings, websites, mobile services, and advertising.
- **Fraud Prevention and Data Protection:** YMCA of the USA may use your Personal Information to verify your identity and to prevent fraudulent activities, unauthorized access, or unauthorized disclosures from occurring. YMCA of the USA may also use your Personal information to protect the security and integrity of our websites, mobile services and organization.
- **Industry Benchmarking:** YMCA of the USA uses your Personal Information for industry benchmarking and data analysis consistent with our legitimate charitable purpose.
- **Operations:** YMCA of the USA uses your Personal Information to help us operate, maintain, and improve our business functions and requirements.
- **Promotional Messaging:** YMCA of the USA uses your contact information to recommend activities and services that might be of interest to you, to send you marketing and advertising messages such as newsletters, announcements or special offers or to notify you about our upcoming events.
- **Research and Data Analytics:** YMCA of the USA uses your Personal Information to better understand YMCA program participant behavior so that we may improve our services and programming initiatives and increase the impact of our services and programs.

How We Share Your Data

Disclosure of Personal Information to Third Parties

YMCA of the USA will not license or sell your Personal Information to others but may disclose your Personal Information to YMCA associations, service providers, affiliates, partners, and third-party vendors that work with YMCA of the USA. We will only share Personal Information with YMCA associations, service providers, affiliates, partners, and third-party vendors to help us provide a product or service to you.

Disclosure of Personal Information for Legal and Safety Reasons

YMCA of the USA may be required to disclose Personal Information to the authorities, law enforcement agencies, government agencies or legal entities. We may disclose Personal Information by law, litigation or as a matter of national security to:

- comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law;
- in the event of an emergency that threatens an individual's life, health or security; or
- to the extent permitted by applicable law in special cases in which we believe it is reasonably necessary to investigate, identify or take preventive measures or bring legal action against someone who may commit or cause harm, fraud, abuse or illegal conduct, such as a threat of harm to you or

anyone else, interference with our rights or property or interference with U.S. homeland or national security or public safety anywhere in the world.

How We Protect Your Data

Our Security Commitment

Securing the information entrusted to us is of the utmost importance for YMCA of the USA. YMCA of the USA uses administrative, technical and physical safeguards to protect the security of your Personal Information from unauthorized disclosure. We use applicable industry standard encryption protocols to keep information secure. YMCA of the USA reviews its security procedures periodically to consider appropriate new technology and updated methods. We also make all attempts to ensure that only necessary people and third parties have access to Personal Information. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of Personal Information and we cannot guarantee the security of our websites or any other site on the Internet. Where required under law, we will notify you of any loss, misuse or alteration of Personal Information that may affect you.

Our Security Standards for Third Parties

We require that our third-party service providers, affiliates, and partners agree to use all confidential information that we share with them only to perform their obligations in the agreements we have in place with them. These third-party service providers, affiliates, and partners are expected to maintain privacy and security protections that are consistent with YMCA of the USA's privacy and information security policies.

How We Store Your Data

YMCA of the USA will retain your Personal Information for as long as required to perform the purposes for which the data was collected, depending on the legal basis for which that data was obtained and/or whether additional legal or regulatory obligations mandate that we retain your Personal Information. We may also retain Personal Information for the period during which a claim may be made in relation to our dealings with you.

Children

YMCA of the USA recognizes the importance of protecting the privacy and safety of children. To provide the services we offer, we may need to collect Personal Information about children under the age of 13 in both online and offline contexts. However, we do not knowingly collect information about children under the age of 13 or minors otherwise defined in local law or regulation without verifiable parental consent. YMCA of the USA may collect Personal Information about a child under the age of 13 if the child's parent or legal guardian registers their child for a YMCA of the USA event, conference or activity. If we learn that someone under 13 has provided Personal Information through one of our websites, we will use reasonable efforts to remove that information from our databases. If you are a parent and have questions regarding YMCA of the USA's data collection practices, please contact us at YUSA.PrivacyOfficer@ymca.net **Opens a new window.**

Links To Other Websites

Using our website or services may link to third party websites, services and applications. YMCA of the USA is not responsible for any Personal Information collected through these means. Any interactions you have with these websites, services or applications are beyond the control of YMCA of the USA. When you post information to or through such services, those websites' privacy policies and cookie usage policies apply directly. We urge you to read the privacy and security policies of any external websites before providing any Personal Information while accessing those websites.

Your Choices And Rights

YMCA of the USA gives you choices about the ways we collect, use and share your Personal Information. You may choose not to provide all of the information that we request. However, if you choose not to provide certain information, some of the services we provide to you may be affected.

Cookies

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet or mobile device. Although you are not required to accept cookies, if you block or reject them, you may not have access to all features available through our services. Please note that if you disable your web browser's cookies and other technologies, certain features of our website and services will be disabled and you will limit the functionality we can provide when you visit our site.

E-mail Communications

We may send e-mails to communicate with you regarding the services that we provide to you. Please note that even if you unsubscribe from e-mail messages, we may still e-mail you about your account and your transactions on our websites.

Mobile Communications

Some of our mobile services use your device's location information. You can adjust the settings of your mobile device at any time to control whether your device communicates this location information.

Access to and Correction of Your Personal Information

YMCA of the USA provides you with many opportunities to access and update your Personal Information. You can ensure that your information is accurate and can also correct, update or delete inaccuracies related to your information by logging into your online account and following the instructions or **[emailing us](#)** **Opens a new window**. We will respond to your request to access your information within 30 days. YMCA of the USA will attempt to answer all requests to correct your data if it is inaccurate or delete it as long as YMCA of the USA is not required to retain it by law or for legitimate business purposes.

In some jurisdictions, in addition to you agreeing to this Privacy Notice, data privacy laws may require us to obtain a separate consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g. where communications are required in order to fulfill your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be Sensitive Personal

Information under local regulations). In addition, to protect your privacy, we will require you to prove your identity before granting access to, or agreeing to update, correct or delete your Personal Information and we will only implement requests with respect to Personal Information about you or if applicable, your minor child.

Notice to Residents of Countries Outside of the United States

Any Personal Information collected about EU data subjects via our websites is processed in the United States by YMCA of the USA or by a third party acting on our behalf. When you provide Personal Information to YMCA of the USA, you consent to the processing of your information in the United States. Our websites are hosted in the United States. YMCA of the USA websites are subject to United States laws, which may not afford the same level of protection of those in your country.

California Privacy Rights

The California “Shine the Light” law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year. YMCA of the USA does not disclose your Personal Information to third parties for direct marketing without your consent.

Changes To This Privacy Notice

YMCA of the USA may review and update this Privacy Notice from time to time to reflect changes in our privacy practices. YMCA of the USA will post a notice to its website to inform you of any changes to our Privacy Notice and indicate when it was most recently updated. We will notify you of any material changes to this Privacy Notice as required by law.

How To Contact Us

If you have any questions about this Privacy Notice or the way in which your Personal Information has been used, please contact us by e-mail at [**YUSA.PrivacyOfficer@ymca.net**](mailto:YUSA.PrivacyOfficer@ymca.net) **Opens a new window** or by postal mail at:

- YMCA of the USA
101 N Wacker Drive
Attention: Office of the General Counsel
Chicago, IL 60606