



## **PRIVACY POLICY**

**Effective as of: February 16, 2022**

Alum Rock Counseling Center, Inc. (“ARCC”) is committed to protecting your privacy. This “**Privacy Policy**” describes how and why we collect information from you or about you in connection with or as part of providing services to you, including through our website at [alumrockcc.org](http://alumrockcc.org) (the “**Site**”), or engaging in written or electronic communications with you (collectively, the “**Services**”). The words “**you**” and “**your**” herein refer to each visitor or user and “**we**,” “**us**,” and “**our**” refer to ARCC.

***Please read this Privacy Policy carefully before using the Services. By accessing or using the Services you agree to be bound by this Privacy Policy. If you are accepting this Privacy Policy for another person as the parent, guardian, conservator, or custodian (“Family Member”), you agree to the terms, conditions, and notices contained or referenced herein on behalf of such Family Member.***

We may revise this Privacy Policy from time to time. If we make significant changes to this Privacy Policy, we will post the revised Privacy Policy here. Each version of this Privacy Policy will be identified at the top of the page by its effective date.

Please note that this Privacy Policy does not describe how we collect or use your Protected Health Information (as defined by the Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”)), which is covered by our Notice of Privacy Practices, available [here](#).

### **COLLECTION AND USE OF PERSONAL INFORMATION**

When you visit our Site, we will not collect any personally identifiable information about you unless you provide it to us voluntarily. Even then, we will collect only that information that we think is necessary for our legitimate interests consistent with the Services offered by ARCC. Such information includes personally identifiable information such as your e-mail address, name, home or work address, telephone number, which you provide to us to participate in programs or Services we offer or which may be offered through our volunteer providers (collectively, “**Personal Data**”). Personal Data does not include “aggregate” or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, Services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes, including, without limitation, to improve and promote the Site or Services.

Some reasons you may choose to provide Personal Data are to complete forms or surveys, create an account, arrange for Services, register for an event, share your story, or take other actions on our Site. Our Site may contain forms through which users may request information or supply feedback. In some cases, Personal Data is required so that we can provide the requested information, check eligibility, or to process credit card payments. Though providing Personal Data in connection with customer feedback provided through our Site is completely optional, you may choose to provide your name and contact information to facilitate any requested follow-up. Should you provide such Personal Data, on behalf of yourself or a Family Member, it will be shared only with employees that need it to respond to questions. Personal Data may also be required to take advantage of certain Services offered by ARCC. Note that some of these online services may be operated by third-party vendors. We recommend reviewing the terms and conditions and privacy policies of any such vendors (as further discussed below).

We may also use Personal Data to provide you information that we believe may be of interest to you, such as information about the Services that we offer. You may opt out of receiving such information as described more fully below. Note that you are able to visit our Site without providing Personal Data, but it may be required to fully participate in certain beneficial services like the ones mentioned above.

We may also collect information about your computer hardware and software that does not reveal your Personal Data and cannot be traced back to a specific individual. This information can include your IP address, browser type, domain names, access times, and referring Site addresses. We collect this data automatically to help us administer and improve your experience with the Site, to understand how visitors are using the Site, and to perform statistical analysis (e.g., monitoring traffic flow to and from the Site). It may also be used to measure the popularity of services and programs that we offer.

**“Cookies”** are text files that a web server places on your computer or device to help the web server keep track of information related to your use. Cookies cannot be used to run programs or deliver viruses to your computer, and they are not linked to any Personal Data.

One of the primary purposes of cookies is to personalize your experience when interacting with the Site. For example, if you register with an ARCC service through the Site, a cookie helps the web server to recall your specific information on subsequent visits. When you return to the Site, the information you previously provided can be retrieved, so you can easily use the features that you customized. Cookies also help us to track traffic patterns as noted above to help us improve the Site. Some third-party services providers that we engage (including third-party advertisers) may also place their own cookies on your hard drive. Note that this Privacy Policy covers only our use of cookies and does not include use of cookies by such third parties.

Most web browsers automatically accept cookies, but you can usually modify your browser settings to prevent the acceptance of cookies, and cookies may be deleted at any time. Note that rejecting cookies may prevent you from using certain features of our Site. The “help” section located in the toolbar of most web browsers will provide instructions for disabling the acceptance of cookies.

**“Web Beacons”** (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Site for several purposes, including to deliver or communicate with cookies, to track and measure the performance of our Site, to monitor how many visitors view our Site, and to monitor the effectiveness of our advertising. Unlike cookies, which are stored on the user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

### **Third-Party Links:**

Our Services and Site may use or contain links to sites that are not operated by ARCC. You may be asked by those sites to provide Personal Data or to release information you may have provided on our Site. You are not required to provide or release any Personal Data. We may also allow certain “widgets” (i.e., social share buttons) on our Site to allow users to easily share information to social media or other platforms. The third parties that own these widgets may have access to information about your browsing history on Sites where the widgets are placed. We encourage you to review the privacy policies of any third-party websites you choose to link from our Site or social media platforms so that you can understand how those websites/platforms collect, use, and share your information. ARCC does not control, and is therefore not responsible for, the privacy policies or other content on third-party Sites or social media platforms.

## **INFORMATION SHARING AND DISCLOSURE**

### **Sharing with Service Providers:**

We may contract with third-party service providers to help us administer our Site and related Services. These service providers will only have access to your Personal Data for performing the contracted services and are expressly obligated not to use or disclose your Personal Data for any other purpose.

### **Sharing with Third Parties:**

We may share the computer hardware/software data we collect automatically in the aggregate with third parties for quality improvement purposes, research and analysis, and other similar purposes.

We use Google Analytics to understand the way that our Site’s visitors interact with it. We have enabled the following Google Analytics advertising features: Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and Integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers. You may opt out of Google Analytics tracking by installing the Google Analytics Opt-Out Browser Add-On. You can find additional information regarding the Google Analytics Opt-Out Browser Add-On at <https://tools.google.com/dlpage/gaoptout>.

We use Google AdWords remarketing technology to market our Site. We place a cookie on your browser, and then Google reads the cookie and may present an advertisement on a third-party site after you have visited our Site. As discussed above, you may opt to disable cookies in your web

browser settings. You may opt out of ad serving on Google's Opt-Out page at <http://www.google.com/settings/ads>.

We also use Facebook Advertising remarketing technology to market our Site. Facebook may use cookies to collect or receive information from our Site and other sites using that information to provide analytics and advertisement targeting. You can opt out of the collection of ad targeting related information by following Facebook's Opt-Out instructions available on Facebook's Help Center. You may also opt out of Facebook and other web tracking technologies through the Digital Advertising Alliance at <http://optout.aboutads.info>.

### **Disclosure for Legal Purposes:**

We may use any collected Personal Data to contact users in connection with their inappropriate use of our Site, or in connection with a complaint another user has filed about their use.

We may also disclose any information to another party (e.g., law enforcement or government officials) to comply with legal requirements, court orders, or government agency requests; to protect or defend ARCC; to protect the rights and safety of any third party, user, or the public; to stop any activity that we consider illegal or unethical; or, to the extent required or allowed by law, in connection with a corporate transaction, such as a merger, divestiture, consolidation, or asset sale; or in the event of bankruptcy.

### **DO NOT TRACK SIGNALS**

“Do Not Track” signals are requests by web browsers to disable a web application's tracking of Site or cross-site traffic. California law requires us to disclose how we respond to such Do Not Track signals. Our Site does not have the capability to respond to any Do Not Track configuration set in your web browser, so we do not disable tracking or take any other action in response.

### **CHILDREN'S PRIVACY**

Our Site is not directed to or intended for children under the age of 13 and we do not knowingly collect personal information from such children without parental consent. If we find out that we have inadvertently collected personal information from a child under the age of 13, we will take steps to remove such information from our systems. If you are under the age of 13, please consult a parent or guardian for help.

### **OPT-OUT**

As noted previously, we may send you free newsletters and/or promotional information about Services that we provide. When you receive such communications from us, you will have the opportunity to “opt out” by following the unsubscribe instructions provided in the email you receive.

## NOTICE TO CALIFORNIA USERS AND RESIDENTS

Under California Civil Code Section 1789.3, California users are entitled to the following specific consumer rights notice: If you have a question or complaint regarding our Site, please send an email to **info@alumrockcc.org**. You may also contact us by writing to ARCC, **777 N. First St. Suite 444, San Jose, CA 95112**. California residents may reach the Consumer Information Center of the California Department of Consumer Affairs in writing at 1625 North Market Blvd., Suite N-112, Sacramento, California 95834, or by telephone at (916) 445-1254 or (800) 952-5210.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask for a notice identifying the categories of Personal Data that we share with certain third parties for direct marketing purposes under certain circumstances and providing contact information for such third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: ARCC, **777 N. First St., Suite 444, San Jose, CA 95112**.

## CHANGING OR DELETING PERSONAL INFORMATION

If you wish to update, delete, or correct any Personal Data you have provided through our Site, you may:

- Send a written request to: ARCC, **777 N. First St., Suite 444, San Jose, CA 95112**.
- Send an electronic request to: **info@alumrockcc.org**.
- Call **(408) 240-0070** to submit a verbal request.

## OTHER QUESTIONS OR COMMENTS

If you have any questions about this Privacy Policy, or any questions or concerns about our collection, use, or disclosure of your Personal Data, please contact us using any of the methods listed immediately above.