



# Privacy Policy (for Donor Privacy Policy see #12)

**EFFECTIVE DATE: 07/01/2020**

*JobTrain has been designated by the City of East Palo Alto as the “operator” of the East Palo Alto Career Center for the City of East Palo Alto. This website is operated by JobTrain. Any reference to JobTrain in this document is also applicable to the East Palo Alto Career Center.*

JobTrain values your privacy. JobTrain is a 501(c)(3) nonprofit organization that is committed to helping those who are most in need to succeed. JobTrain’s purpose is to improve the lives of people in our community through assessment, attitude, job skills training, and high potential career placement. In this Privacy Policy (“Policy”), we describe how we collect, use, and disclose information that we obtain about visitors to our websites [www.jobtrainworks.org](http://www.jobtrainworks.org) or [www.epacareercenter.org](http://www.epacareercenter.org) (the “Site”) and the services available through our Site (the “Services”).

By visiting the Site, or using any of our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site or Services, and any dispute over privacy, is subject to this Policy and our [Terms and Conditions](#) including its applicable limitations on damages and the resolution of disputes. The JobTrain Terms of Use are incorporated by reference into this Policy.

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## **1. What Information Do We Collect About You and Why?**

We may collect information about you directly from you and from third parties, as well as automatically through your use of our Site or Services.

### ***Information We Collect Directly From You.***

- You may register for workshops and events at our Site. To register you must provide your name, address, phone, date of birth, email address, and other information; we may ask for additional optional information as well.
- If you use our programs and services or workshops, you may also be asked to provide your name, email address, phone number, home address and other information. We also may collect additional optional information from you, including ethnicity and other demographic information; however, you are not required to provide us with this information.
- *Funding Contribution.* When you make a funding contribution, we collect your email address, name, mailing and billing address, and phone number, as well as other optional information.
- *Other.* When you communicate with us via email, postal mail or otherwise, we collect information about our interactions with you. From time-to-time, we also administer survey and questionnaires to you about a variety of topics and issues and collect your responses to these.

***Information We Collect Automatically.*** We may automatically collect the information about your use of our Site or Services through cookies, web beacons, and other technologies, including: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; location information; the length of time you visit our Site and or use our Services; and the referring URL, or the webpage that led you to our Site. Please see the section Our Use of Cookies and Other Tracking Mechanisms below for more information about our use of cookies and other tracking mechanisms.

## **2. How We Use the Information We Collect**

We use the information that we gather about you for the following purposes:

- To process your funding contribution, pledges, or other payments.
- To send you information about JobTrain and the East Palo Alto Career Center by mail, Email, other electronic means including text messaging which you will be able to opt out of as you prefer.
- To provide our Services to you, to communicate with you about your use of our Services, to respond to your inquiries, and for other customer service purposes.
- To tailor the content and information that we may send or display to you, to provide personalized help and instructions, and otherwise to personalize your experiences while using the Site or our Services.
- For marketing and promotional purposes. For example, we may use your information, such as your email address, to send you news and newsletters, and promotions, or to

otherwise contact you with information we think may interest you. We also may use the information that we learn about you to assist us in advertising our Services on third-party websites.

- To better understand how users access and use our Site and Services, both on an aggregated and individualized basis, in order to improve our Site and Services and respond to user desires and preferences, and for other research and analytical purposes.
- JobTrain does not share, trade or sell any donor, client, student personal information with anyone.

### **3. How We Share the Information We Collect**

We may share the information that we collect about you, including personally identifiable information, as follows:

- ***Service Providers.*** We may disclose the information we collect from you to third-party vendors, service providers, contractors, or agents who perform functions on our behalf. These third parties are not permitted to use the information collected on our behalf, except to help us conduct and improve our business.
- ***Business Transfers.*** If we are acquired by or merged with another entity (such as a different nonprofit), if substantially all of our assets are transferred to another entity, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
- ***In Response to Legal Process.*** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- ***To Protect Us and Others.*** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy and the Terms of Use, or as evidence in litigation in which JobTrain is involved.
- ***Aggregate and De-Identified Information.*** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research, or similar purposes.

### **4. Our Use of Cookies and Other Tracking Mechanisms**

We and our third party service providers may use cookies and other tracking mechanisms to track information about your use of our Site or Services. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to enable a faster login process or to allow us to track your activities at our Site and Service.

***Third-Party Tracking.*** We may also engage third parties, such as Google Analytics, to track and analyze data from our Site or Services. We use the data collected by such third parties to help us administer and improve the quality of our Site and Services and to analyze Site usage. These third parties are not permitted to use the information collected on our behalf, except to help us conduct and improve our business.

***Disabling Cookies.*** Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will be able to browse certain areas of the Site, but some features may not function.

***Third Party Analytics.*** We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site and Services. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

***Clear GIFs, pixel tags and other technologies.*** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs, or pixel tags), in connection with our Site to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

## **5. Third-Party Links**

Our Site and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

## **6. User-Generated Content**

We may invite you to post content on our Site, including your comments, pictures, and any other information that you would like to be available on our Site. If you post content to our Site, all of the information that you post will be available to all visitors to our Site. If you post your own content on our Site or Services, your posting may become public and JobTrain cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.

## **7. Security of My Personal Information**

We have implemented commercially reasonable precautions—including, where appropriate, to protect the information we collect from loss, misuse, and unauthorized access, disclosure,

alteration, and destruction. Please be aware that despite our best efforts, no data security measures can guarantee 100% security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

## **8. Marketing Communications**

We may send periodic informational or promotional emails to you. You may opt out of such communications by emailing us at [info@epacareercenter.org](mailto:info@epacareercenter.org) or [info@jobtrainworks.org](mailto:info@jobtrainworks.org) with the subject line of “Unsubscribe” or following the opt-out instructions contained in the email. Please note that it may take up to ten business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Services you have requested or received from us.

## **9. Children’s Privacy**

Our Services are not designed for children under 17. If we discover that a child under 13 has provided us with personal information, we will delete such information from our systems.

## **10. Contact Us**

If you have questions about the privacy aspects of our Services or would like to make a complaint, please contact us at [info@epacareercenter.org](mailto:info@epacareercenter.org) or [info@jobtrainworks.org](mailto:info@jobtrainworks.org)

## **11. Changes to this Policy**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site, at [epacareercenter.org/privacy-policy](http://epacareercenter.org/privacy-policy) or [jobtrainworks.org/privacy-policy](http://jobtrainworks.org/privacy-policy).

## **12. Donor Privacy Policy**

**JobTrain** is committed to respecting the privacy of our donors. We have developed this privacy policy to ensure our donors, clients, and students’ personal information will not be shared with any third party.

**Awareness.** JobTrain provides this Donor Privacy Policy to make you aware of our privacy policy, and to inform you of the way your information is used. We also provide you with the opportunity to remove your name from our mailing list, if you desire to do so.

**Information Collected.** Here are the types of donor information that we collect and maintain:

- contact information: (*optional*) name, organization, position/title, complete address, phone number, email address
- payment information: credit card number and expiration date, and billing information; mailing address through personal check via postal mail

- information concerning how you heard about JobTrain (*optional*)
- information you wish to share: questions, comments, suggestions
- your request to receive periodic updates; e.g. to individuals who request it, we will send periodic mailings related to specific fund-raising appeals, newsletters, announcements of training programs, job fairs, and supportive services available.
- **How Information is used.** JobTrain uses your information to understand your needs and provides you with better services. Credit card numbers are entered through our “Donate” button which is a direct portal to MobileCause, a leading company in online donations, and used only for donation payment processing and are not retained for other purposes. Please see the MobileCause Privacy Policy by clicking [here](#). No credit card information is housed in the JobTrain website. MobileCause does forward basic identifying information so that we may properly acknowledge your donation. This information is uploaded into our donor database (see “Who do we share your information with?” below). We use the comments you offer to provide you with information requested, and we take seriously each recommendation as to how we might improve communication. We publicly list all donors (any donor can ask to remain anonymous) in our “Donor Honor Roll Thank you” list published in our newsletters which are sent by mail, email and posted through a link on our website. Again, anyone can ask to remain anonymous on these lists.

**No Sharing of Personal Information.** JobTrain will not sell, rent, or lease your personal information to other organizations. We assure you that the identity of all our donors will be kept confidential. Use of donor information will be limited to the internal purposes of JobTrain.

**Removing Your Name from Our Mailing List.** It is our desire to not send unwanted mail to our donors. Please contact us if you wish to be removed from our mailing list. To be removed from the electronic newsletter, please click the unsubscribe link in the newsletter.

**Email.** If you sign-up for our email newsletter, from time to time we may send you our newsletter and email messages informing you of special events or services. Our newsletters may contain code that enables our database to track your usage of the newsletters whether this email was opened and/or what links (if any) were clicked. Included in these emails will be an option to allow you to opt out and thus be removed from the email list.

**Who do we share your information with?** Our donor database is provided by Salesforce.com, a trusted name in nonprofit fundraising. Salesforce.com. has access to donor information only for the purposes of maintaining the integrity and security of that database. Donor information is only used by JobTrain. We do not share personally identifiable donor information with others.

## **What Else Should You Know about your privacy?**

### **Security**

If you choose to make a donation online, you can click the “Donate” button which will take you to a page operated by MobileCause, a leader in online donation. Please see MobileCause’s

Privacy Policy by clicking [here](#). JobTrain's web page is hosted through Media Temple, a premium web hosting and cloud services support company. Media Temple's Privacy Policy can be viewed by clicking [here](#). Media Temple is verified and secure through the TRUSTe Privacy Verified Seal. To see more information about the certificate please click on the seal.

**Links to other sites.** Our site may have links to other internet sites not maintained by JobTrain. We do not control, operate, or endorse information, products, or services on such third-party sites and we are not responsible for their content. Many third-party sites have their own privacy policies that may be different from ours. This privacy policy only covers our site and does not cover any other site. While we make every effort to keep your information secure, we do not control the policies of other sites.

**What About Kids' Personally Identifiable Information?** Our site is not aimed at anyone under the age of 18. We assume donations through credit card means are made by adults.

### **Changes to this Privacy Policy**

We may make changes to our privacy policy from time to time, so please be sure to check back periodically.

### **Contacting Us**

If you have comments or questions about our donor privacy policy or would like to be removed from JobTrain's mailing list, please contact Reshma Putnam at [rputnam@jobtrainworks.org](mailto:rputnam@jobtrainworks.org) or call (650) 330-6436.

### **Acceptance of Privacy Policy**

Your use of this site, including any dispute concerning privacy, is subject to this privacy policy. **BY USING THIS SITE YOU ARE ACCEPTING THE PRACTICES SET OUT IN THIS PRIVACY Policy.** We reserve the right to modify this privacy policy at any time by posting the changes on this page. Please check the revision date below to determine if the policy has been modified since you last reviewed it. Your continued use of any portion of our site following posting of the updated privacy policy will constitute your acceptance of the changes.

### **Effective Date**

This privacy policy was last revised on **July 1, 2020**.