

# Privacy Policy

Effective: June 22, 2026

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## 1. Introduction

The Herren Project ("we," "us," or "our") is a 501(c)(3) nonprofit organization based in Portsmouth, Rhode Island. This Privacy Policy explains how we collect, use, share, and protect personal information through our website (herrenproject.org), our donation platforms, our email and text communications, and our interactions with donors, supporters, program participants, volunteers, and visitors. By using our website or otherwise providing us with personal information, you agree to the terms of this Policy.

If you are a participant in a Herren Project program that involves protected health information ("PHI") subject to the Health Insurance Portability and Accountability Act (HIPAA), a separate Notice of Privacy Practices applies to your PHI in that program. Our HIPAA Notice is available on request from the contact information below.

## 2. Information We Collect

*Information you give us directly.*

When you make a donation, sign up for our newsletter, register for an event, contact us, apply to a program, or otherwise interact with us, you may give us your name, mailing address, email address, phone number, employer or workplace, payment information (processed by our third-party payment providers), and any other information you choose to share.

*Information collected automatically.*

When you visit our website, our systems and our service providers may automatically collect information such as your IP address, browser type and version, device type, operating system, referring website, pages viewed, links clicked, and the date and time of your visit. We use cookies, web beacons, and similar technologies to support site functionality, remember preferences, measure traffic, and improve our communications. You can control cookies through your browser settings; some features of the site may not work if you disable them.

*Information from third parties.*

We may receive information about you from employer matching-gift programs, donor-advised funds, social media platforms when you interact with us there, and other third parties who share information with us in accordance with their own privacy policies.

## 3. How We Use Your Information

We use personal information to:

- process and acknowledge donations and issue tax receipts;
- communicate with you about programs, events, fundraising campaigns, and updates;
- respond to your inquiries, applications, and requests;
- administer scholarships, services, and program participation;

- operate, maintain, and improve our website and communications;
- comply with legal obligations, including tax reporting and state charitable registration requirements; and
- detect and prevent fraud and protect the security of our systems and the people we serve.

#### **4. How We Share Your Information**

The Herren Project does not sell, rent, or trade your personal information. We share information only as follows:

##### *Service providers.*

We work with trusted third-party vendors who help us run our operations — including payment processors, email and text-message service providers, donor management and CRM systems, website hosting, cloud storage, and analytics. These vendors are permitted to use your information only to perform services on our behalf and are required to safeguard it.

##### *Legal requirements.*

We may disclose information when required by law, subpoena, court order, or other legal process; to enforce our policies; or to protect the rights, property, or safety of The Herren Project, the people we serve, or others.

##### *With your consent.*

We may share information in other ways if you direct us to do so.

##### *Organizational changes.*

If The Herren Project is involved in a merger, acquisition, restructuring, or transfer of assets, your information may be transferred as part of that transaction, subject to the protections of this Policy.

#### **5. Cookies, Analytics, and Online Tracking**

Our website uses cookies and similar technologies to operate the site, remember your preferences, understand how visitors use the site, and measure the effectiveness of our communications. We use analytics services (such as Google Analytics) and may use marketing pixels from social media platforms to measure campaign performance. These tools collect information such as pages visited, time on site, and approximate location. You can manage cookies through your browser, opt out of Google Analytics through Google's opt-out tools, and limit interest-based advertising through the Digital Advertising Alliance (optout.aboutads.info) or the Network Advertising Initiative (optout.networkadvertising.org).

#### **6. Email and Text Communications**

We send fundraising appeals, newsletters, event invitations, and program updates by email and, with your consent, by text message. Every fundraising email includes an unsubscribe link, and you can opt out of text messages at any time by replying STOP. You may also email [development@herrenproject.org](mailto:development@herrenproject.org) or write to us at the address below to be removed from any of our mailing lists. We will honor opt-out requests promptly. Standard message and data rates may apply to text messages.

## **7. Donor and Supporter Rights**

We honor the Donor Bill of Rights developed by the Association of Fundraising Professionals. You have the right to know how your gift is used, to receive acknowledgement, and to be removed from our communications. You may also:

- ask what personal information we hold about you;
- request corrections to inaccurate information;
- request deletion of your personal information, subject to legal recordkeeping requirements; and
- opt out of fundraising or marketing communications at any time.

To exercise any of these rights, contact us at the information below.

## **8. State Privacy Rights**

Although nonprofit organizations are generally exempt from comprehensive state consumer privacy laws — including the California Consumer Privacy Act (CCPA/CPRA), the Virginia Consumer Data Protection Act, the Colorado Privacy Act, the Connecticut Data Privacy Act, the Utah Consumer Privacy Act, and similar laws in other states — The Herren Project respects the principles behind these laws. On request, we extend to residents of any state the right to know what personal information we hold about them, the right to request correction or deletion of that information, and the right to opt out of marketing communications. To submit a request, contact us at the information below.

## **9. Children's Privacy**

Our website is not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If you believe a child under 13 has provided personal information through our website, please contact us and we will delete it. Programs we deliver in schools or other youth settings operate under separate consent procedures managed in partnership with the relevant school or organization.

## **10. Data Security**

We use reasonable administrative, technical, and physical safeguards to protect personal information against loss, theft, and unauthorized access, use, or disclosure. Donations are processed by PCI-compliant payment providers; we do not store full credit-card numbers on our own systems. No method of transmission or storage is 100% secure, however, and we cannot guarantee absolute security.

## **11. Data Retention**

We retain personal information for as long as needed to fulfill the purposes described in this Policy and to meet legal requirements, including tax, audit, and donor-recordkeeping obligations (typically seven years for donor records). When information is no longer needed, we delete or de-identify it.

## **12. Third-Party Links**

Our website may contain links to websites operated by third parties. We are not responsible for the privacy practices or content of those sites. We encourage you to review the privacy policy of any

third-party site you visit.

### **13. Visitors Outside the United States**

The Herren Project operates from the United States, and the personal information you provide is processed and stored in the United States. If you visit our website or provide information from outside the United States, you understand that your information will be transferred to and processed in the United States, where data protection laws may differ from those in your country.

### **14. Changes to This Policy**

We may update this Policy from time to time. When we do, we will revise the "Effective" date at the top. Material changes will be highlighted on our website or communicated to you by email where appropriate. Your continued use of the website after a change takes effect indicates your acceptance of the revised Policy.

### **15. How to Contact Us**

Questions, requests, or complaints regarding this Policy or our privacy practices may be directed to:

**The Herren Project**

Attn: Privacy Officer

P.O. Box 131

Portsmouth, RI 02871

(844) 543-8555

privacy@herrenproject.org

### **16. HIPAA Notice of Privacy Practices**

If you are a participant in a Herren Project program that involves protected health information subject to HIPAA, a separate Notice of Privacy Practices applies to that information. A copy of our HIPAA Notice is available on request from the contact above.

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*This Policy is reviewed periodically. It was last updated on June 22, 2026.*