



Online Privacy Policy

I. PURPOSE

La Clínica del Pueblo values the privacy of those who use its website. An online privacy policy informs users of what information they are sharing with La Clínica, what La Clínica will do with the information, and how the information will be protected.

II. POLICY

La Clínica will post an online privacy policy to its website so users may access the information if they seek to. Use of La Clínica del Pueblo's website signifies the user's understanding and agreement to comply with the entire online privacy policy.

III. PROCEDURE

1. The Executive Director or their designee will ensure that an online privacy policy is posted on La Clínica's website.
 - a. The current online privacy policy is available in this document in Attachment A.
2. The Executive Director or their designee will review the online privacy policy and make changes where needed.

IV. DEFINITIONS

User: any individual who accesses La Clínica's website.

V. REFERENCES

None.

VI. ATTACHMENTS

Attachment A: Current La Clínica Online Privacy Policy

VII. REVISION HISTORY

First Issued:December 14, 2022

Information Technology and Management – Online Privacy Policy

Revised:.....[INSERT]
Summary of Changes

Revised:.....[INSERT]
Summary of Changes

APPROVED BY:

DocuSigned by:

Edgar Jimenez

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President

**La Clínica del Pueblo
Board of Directors**

12/23/2022

Date

Attachment A**Use of La Clínica del Pueblo’s website signifies the user’s understanding and agreement to comply with the entire online privacy policy.**

This Privacy Policy applies to www.lcdp.org (the “Website”) and governs our online data collection and usage. For the purposes of this Privacy Policy, “we,” “us,” and “our,” refer to La Clínica del Pueblo (La Clínica) and all of its affiliates, and “you” or “your” refers to you, a user of this Website.

By using the Website, you consent to our collection, use, and disclosure of your Personal Information (defined below) as described in this Privacy Policy. Please review the entire policy to learn about what type of information is gathered, how such information is used, and what information may be disclosed to third parties. If you do not consent to our practices, you can choose not to use the Website or not to submit any Personal Information to La Clínica.

I. COLLECTION OF INFORMATION

Personal Information. We may collect, use, store and transfer different kinds of information about you, your device, and your online activities some of which may be personally identifiable, which we have grouped together as follows (collectively “Personal Information”):

Information You Provide. La Clínica collects Personal Information when you communicate with us through email or our online form including your name, email address, and any information you voluntarily provide in the communication.

Information We Receive From Third Parties. We may receive Personal Information about you from third parties when you sign up for our newsletter, submit a donation, purchase art, or apply for a career, including mailing address, residential address, email address, phone number, donation amount, honoree name, products purchased, payment information, past employment information and education information. We may associate this information with the other Personal Information we have collected about you. The collection, use and disclosure of information to third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you and may collect information and use it in a way inconsistent with this Privacy Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used and disclosed by these third parties.

Cookies. A cookie is a small data file stored on your hard drive that your browser provides to us when you visit certain web pages. If you do not want to store cookies on your computer, you can set your browser to refuse cookies or to alert you when cookies are being sent. However, some parts of the Website may not function properly if you choose not to accept cookies. If you are concerned that you have created a cookie in a previous visit, you can delete cookies that are already stored on your hard drive by accessing your computer’s cookie file.

Pixel Tags. Pixel tags (a.k.a. clear gifs) are tiny graphics with a unique identifier, similar in function to cookies, which allow us to monitor the use of our Website and to deliver banner advertisements to you about our products and services as you browse the Internet. Pixel tags generally work in conjunction with cookies, registering when a particular computer visits a particular page. You cannot decline pixel tags; however, if you turn off cookies the pixel tag will simply detect an anonymous visit. In addition, we use pixel tags in our HTML-based emails to let us know which emails have been opened by the recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

Third-Party Cookies. We may engage third-party service providers, including Google, to serve ads to you about our products and services as you browse the Internet. These third-party providers may use their own cookies tags to track your online activities and purchases in order to deliver targeted advertising based on your interests. You can learn more about Google’s advertising cookies and opt-out options by visiting <http://www.google.com/policies/technologies/types/>.

Analytics. We may use one or more third-party analytics programs including, but not limited to, Google Analytics to help analyze how users utilize the Website. Google Analytics does not store any Personal Information. Google Analytics uses a cookie containing an anonymous identifier to distinguish users and to collect standard internet log information and visitor behavior information. The information generated by the cookie about your use of the Website (including IP address) is transmitted to Google. This information is used to create statistical reports on user activity for La Clínica. For more information about Google Analytics, including opt-out options visit <https://support.google.com/analytics/answer/6004245>.

Usage Data. Like most website operators, we collect information about your activities online, including referring / exit pages and URLs, computer settings, number of clicks, domain names, landing pages, pages viewed, and other such information through the use of Internet Protocol (IP) addresses, click-through URLs, domain name tracking, and analytics (“Usage Data”). Usage data is typically non-personally identifying information or is information that, without the aid of additional information, cannot be directly associated with a specific person. If you have voluntarily disclosed personally identifiable information to us, some or all of the Usage Information may be linked to that information. When you access and use the Website from your mobile devices, we receive Usage Data from the mobile device you use to access the Website. This may include your location data, IP address and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

II. USE OF INFORMATION

Our primary purpose for collecting Personal Information is to provide you with the goods and services you request. We may also use your Personal Information for the following purposes:

- To provide letters of acknowledgment for tax purposes
- To thank you for your donation(s)
- To otherwise communicate with individuals in written, electronic, and verbal form
- To provide information on our services
- To improve and optimize our services and the Website
- To verify information
- To send announcements of new developments or opportunities related to the Website or our services
- To customize the advertising and content you see
- To determine your eligibility for employment
- For any other purpose disclosed at the point of collection

We may also use the information we collect on our Website as necessary to comply with legal requirements, to enforce our Terms of Use, to prevent fraud, to co-operate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities.

III. DISCLOSURE OF INFORMATION

Affiliated Companies. We may share Personal Information with our parent organization, subsidiaries, and other organizations owned by, controlled by, or under common control with La Clínica, who may use the Personal Information for the purposes described above.

Service Providers. We may disclose your Personal Information to third-party service providers hired to perform internal business functions on our behalf including, but not limited to, providing sending direct mail or email, website or database hosting companies, email service providers, analytics companies, and payment processing companies. Unless otherwise stated, these companies do not have any right to use the Personal Information we provide to them beyond what is necessary for them to assist us.

Legal Disclaimer Concerning Subpoenas and Other Matters. La Clínica reserves the right to disclose Personal Information about you, without notice, when we believe, in our sole discretion, that such disclosure is appropriate to: (a) comply with the law or comply with legal process served on La Clínica or other law enforcement requests; (b) protect and defend our rights, property, safety, or other interests, including those of our parent company, subsidiaries, affiliates, shareholders, customers, or others; (c) protect against misuse or unauthorized use of our Website and to enforce or apply our Terms of Use and other agreements; or (d) protect the personal safety of users of La Clínica, or the public.

Business Transitions. We reserve the right to transfer all Personal Information in our possession in the event La Clínica goes through a business transition, such as a merger, acquisition by another

organization, or sale of a portion of our assets. Similarly, your Personal Information may be passed on to a successor-in-interest in the event of a reorganization, reconstruction, liquidation, bankruptcy, or administration. Users will not be notified of any such change of ownership or control of their Personal Information.

IV. LOCATION, INTERNATIONAL TRANSFER, AND CHOICE OF LAW

By accessing and/or using the Website, you acknowledge and agree that La Clínica operates the Website from its offices located in the United States and is directed to residents of the United States. If you use the Website from the European Economic Area or other regions of the world with laws governing data collection and use that differ from laws of the United States, then you understand and consent to the transfer of your Personal Information to the United States for the uses identified above, in accordance with this Privacy Policy and the laws of the United States. You acknowledge and agree that the privacy and data security laws in place in the United States may be different from the privacy and data security laws in force in the country in which you reside. By voluntarily providing Personal Information, you hereby agree that you are consenting to our collection, use, transfer, processing, storage, and disclosure of such Personal Information in accordance with this Privacy Policy and that such collection, use, storage, and disclosure shall be governed by the laws of the United States.

V. SECURITY

No transmission of data over the internet is guaranteed to be completely secure and we cannot guarantee that your submissions to the Website, any content residing on our servers, or any transmissions from our server will be completely secure. It may be possible for third parties to intercept or access transmissions or private communications unlawfully. Any such transmission is done at your own risk.

VI. CHILDREN'S PRIVACY

The Website is intended for adult use only and is not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any personally identifying information. If the parent or guardian of a child under 13 believes that the child has provided us with any personal data, the parent or guardian of that child should contact us at the email address below and ask to have this personal information deleted from our files. We appreciate your cooperation with this federally mandated requirement.

VII. NOTICE TO CALIFORNIA RESIDENTS

Your California Privacy Rights. California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or our third-party advertisers and marketing partners, if any, to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. Requests should be submitted using the contact information below. Within thirty (30) days of receiving such a request, we will provide a list

of the categories of personal information disclosed to third parties for direct marketing purposes during the immediately preceding calendar year, if any, along with the names and addresses of these third parties, if any. Please be aware that not all information sharing is covered by the requirements of Section 1798.83 and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Our Website does not accept or process such Do Not Track signals or similar mechanisms. Other Third-Party Websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

VIII. COMMUNICATIONS AND OPT-OUT

By contacting us (including via email or by the “Contact Us” form on our Website), subscribing to our newsletter, or applying for a career at La Clínica, you may consent to receive periodic promotional email communications from us the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.

If you would like to stop receiving marketing or promotional communications via email from La Clínica, you may opt out of such communications by following the unsubscribe instructions in a promotional email. If you choose to opt-out of receiving such promotional communications, we may still send you administrative, operational, or information communications, including regarding donations or purchases you make, career applications you submit, inquiries or messages you submit via our Website, and other non-promotional information. You may continue to receive promotional email messages for a short period while we process your opt-out request.

IX. LINKS TO THIRD PARTY SITES

The Website may contain links to sites other than our own such as Facebook, Twitter, LinkedIn, and Instagram (“Third-Party Websites”). This Privacy Policy does not cover the collection, use, or disclosure of the information collected by these Third Party- Websites. Third-Party Websites may not follow the same privacy policies as La Clínica. We have no responsibility for Third-Party Websites and provide links to Third- Party Websites solely for your convenience. Third-Party Websites may send their own cookies and pixel tags to you and may collect information and use it in a way inconsistent with this Privacy Policy. We encourage you to review the privacy policies or statements of these Third-Party Websites to learn more about how they collect, use, and disclose information.

X. CHANGES TO THIS POLICY

La Clínica reserves the right to modify this Privacy Policy at any time without giving you prior notice. Your use of the Website after any such modification constitutes your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy. For this reason, we encourage you to review the Privacy Policy and other terms whenever you use the Website.

XI. CONTACT INFORMATION

Information Technology and Management – Online Privacy Policy

La Clínica welcomes your questions or comments regarding this Privacy Policy. If you believe that La Clínica has not adhered to this Privacy Policy, please contact La Clínica at 2831 15th St NW Washington, DC 20009 or (202) 462-4788.