## **Atlas Corps Privacy Policy**

**Effective Date:** Effective 5/24/2018

Atlas Service Corps, Inc. ("Atlas Corps," "we," "our," or "us") provides this privacy notice to describe how we process personal data of individuals that visit our site at atlascorps.org ("website") or otherwise interact with us.

### **Questions about the Atlas Corps Private Policy**

This Website is owned and operated by Atlas Corps. We recognize that visitors to our site may be concerned about the information they provided to us, and how we treat that information. This Privacy Policy addresses those concerns. If you have questions about our Privacy Policy, please contact:

Atlas Corps ATTN: Communications 99 M St SE 4th Floor Washington, DC 20003

privacy@atlascorps.org 202-391-0694

# **Website Information Accuracy**

It is the policy of Atlas Corps to present correct and accurate information. If inaccuracies come to our attention, Atlas Corps will attempt to correct them in a timely manner. To report any website inaccuracies, please e-mail privacy@atlascorps.org.

#### INFORMATION COLLECTION

Atlas Corps collects personal data, defined as any information relating to an identified or identifiable person, through its website.

We collect any information provided by you when you visit our website, including: (a) your name; (b) your mailing address; (c) your email address; (d) your telephone number; (e) your sex; (f) your date of birth; (g) your country of citizenship; (h) your country of residency; (i) your country of birth; (j) the names, sex and dates of birth of any dependents; (k) your occupation; (l) your educational history; (m) the anticipated amount of personal funds available to you during the course of an Fellowship; (n) proof of insurance, and any other information you choose to provide us. Additionally, if you are given the option to have information password protected, that password will be part of your personal data.

We also use cookies and similar technology to collect personal and non-personal data, such as: (i) information from server logs found on your browser; (ii) click-through statistics; (iii) your IP address and country; (iv) the type of web browser you are using to access this website; (v) the type of operating system you are using; (vi) the name of the domain and host from which you access the Internet; (vii) the date and time you access this website and the duration of your visit; and (viii) the Internet address of the site from which you linked directly to this website. We may combine information that you provide to us with other information that is publicly available or that we receive from other sources.

The provision of personal data is sometimes required by law and at other times is a result of a contractual requirement. You may be required to provide personal data, for example in a case where we sign a contract with you or where you sign an employee agreement, and the non-provision of personal data could, in certain circumstances, prevent a transaction from concluding. In other scenarios, we are required to collect data for legal compliance purposes, such as for compliance with immigration laws.

#### **INFORMATION USE**

We use your personal data for the following purposes:

- To assess applicants and administer Atlas Corps programs;
- To enhance the performance and functionality of the website:
- To deliver products and services you request
- To respond to your inquiries, or contact you as you request;
- To advertise and market our products and services, including through email;
- To process your donations and applications;
- For Atlas Corps internal business purposes, including for analytics purposes;
- To protect the security of our interests, including our premises, assets, and systems;
- To comply with the law including compliance with immigration laws;
- To solicit donations; or
- As otherwise disclosed at the time personal data is collected.

We do not use automatic decision-making or engage in automated profiling. Where we intend to use or otherwise process your personal data for a purpose other than the purpose for which it was collected, we will provide you with information regarding the purpose for the processing, as well as other relevant information, prior to processing your personal data for the new purpose.

#### **INFORMATION SHARING**

We may share your personal data with the following third parties:

- Our Host and program partners, and education institutions who serve as Host Organizations;
- Other professional service providers who assist applicants with legal compliance;
- Third party vendors who process data on behalf of Atlas Corps, such as email service providers, web hosting providers, survey hosts, interview platform hosts, mass communication service providers, payment processors and program application hosts;
- Our affiliates (such as travel, housing, transportation, and hotel vendors, health insurance companies and providers, program funders, selection committees, U.S. and foreign governments, programming organizations, and alumni organizations) to offer our services to you consistent with the purposes identified in this privacy notice, including the marketing of Atlas Corps products and services;
- In connection with a merger, sale, or acquisition or other transfer involving all or part of Atlas
  Corps or as part of a corporate reorganization, stock sale or other change of control of all or part
  of our assets, including as part of a bankruptcy proceeding;
- Pursuant to a subpoena, court order or other legal process, or as otherwise required by law, or to protect our rights or the rights of third parties; and/or
- With your consent or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been anonymized or aggregated without limitation.

#### THIRD-PARTY LINKS AND TOOLS

The website may provide links to third-party websites and tools, including our social media pages as well as our payment processing vendor. We do not control the privacy practices of those websites, and they are not covered by this privacy notice. You should review the privacy notices of other websites that you use to learn about their data practices.

The website may also include integrated social media tools or "plug-ins," such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the website, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party companies and your use of their features are governed by the privacy notices of the companies that provide those features. We encourage you to carefully read the privacy notices of any accounts you create and use.

# **INTERNATIONAL VISITORS**

This section applies to those that visit our website from the European Union.

# **Lawful Basis for Processing**

On certain occasions, we process your personal data when it is necessary for the performance of a contract to which you are a party, such as to provide services to you. We may also process your personal data to respond to your inquiries concerning our products and services.

On other occasions, we process your personal data where required by law. These include immigration purposes, including visa processing. We may also process your personal data if necessary to protect your interests or the interests of a third party.

Additionally, we process your personal data when necessary to do so, to effectuate the following legitimate interests:

- Carrying out direct marketing;
- Making applicant determinations;
- Performing program administration;
- Utilizing service providers;
- Conducting hiring and human resources functions;
- Advocacy and corporate engagement; and
- Hosting events.

These legitimate interests are not overridden by your data protection rights. Where we process your personal data for these purposes, our legitimate interest is to carry out our activities in furtherance of the well-being of all our employees and program participants.

If the processing of personal data is necessary and there is no statutory basis for such processing, we will ask for your consent to process your personal data. You have the right to withdraw your consent to processing of personal data at any time.

If you wish to exercise the right to withdraw consent, contact Atlas Corps Communications Department at <a href="mailto:privacy@atlascorps.org">privacy@atlascorps.org</a>. Visit the "Contact Us" section below for contact information.

#### **Transfers of Personal Data**

Please be aware that the personal data we collect may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location. If you are located outside of the United States, please be advised that we process and store personal data in the United States and your consent to this privacy notice represents your agreement to this processing.

# **Your Rights**

You have a right to the following:

- To request access to the personal data we hold about you;
- To request that we rectify or erase your personal data;
- To request that we restrict or block the processing of your personal data;
- Under certain circumstances, to receive personal data about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal data directly to another, i.e., a right to data portability; and
- Where we previously obtained your consent, to withdraw consent to processing your personal data.

To exercise these rights, contact Atlas Corps Communications Department at <a href="mailto:privacy@atlascorps.org">privacy@atlascorps.org</a>. Visit the "Contact Us" section below for contact information. Please be aware that Atlas Corps may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so. Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence.

#### YOUR CHOICES

At any time, you are entitled to request access to, and make corrections to, your personal data we have collected via this website. If you apply to a Atlas Corps program, you will be able to update, change, or delete personal data. If you no longer wish for us to process your personal data in accordance with your application, you may contact Atlas Corps using the point of contact information that you received during the application process or in the "Contact Us" section below and request that Atlas Corps remove your personal data from our database. Please note that modification of your application status will not stop marketing or advertising content that is ready to be mailed or is queued for transmission to you prior to the time when we can remove your personal data or modify your "opt-in" status.

You can opt-out from receiving information from us that you previously requested or agreed to receive by contacting us as provided in the "Contact Us" section below and communicating your desire to opt-out. However, during the pendency of your application to a Atlas Corps program and also during the course of any program in which you may participate, you may not opt-out of communication with Atlas Corps. Once you have completed a Atlas Corps program, you will be considered part of our 'Alumni' and you will regularly receive 'Alumni' emails from Atlas Corps. You may opt-out from receiving further emails by clicking a link at the bottom of any 'Alumni' email that you receive. Once you have opted-out from Atlas Corps 'Alumni' emails, new emails cannot be sent to your email address.

### **UPDATES AND CHANGES**

We may change this privacy notice from time to time by posting updated versions of the privacy notice on this website and providing notice of changes via email to those that have provided their email address. We encourage you to visit this page periodically to learn of updates.

## **SECURITY**

Atlas Corps, its affiliates and authorized third parties employ reasonable measures, including administrative, technical, and physical measures, to protect your personal data from unauthorized access, loss, alteration, use, or disclosure.

#### **RETENTION**

We will process and store your personal data only for the period necessary to achieve the purpose of the storage, or as permitted by law. The criteria used to determine the period of storage of personal data is the respective statutory retention period or as long as necessary to fulfill the original basis for collecting and processing the personal data unless it is being used for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract or the initiation of a contract.

## **CONTACT US**

If you have questions, comments, or concerns regarding this privacy notice, please contact us: Atlas Corps
ATTN: Communications
99 M St SE
Washington, DC 20003

privacy@atlascorps.org 202-391-0694

To contact us to opt-in or opt-out of receiving information from us as described in "Your Choices" please email us at privacy@atlascorps.org.

#### **CALIFORNIA PRIVACY RIGHTS**

Under California law, we are required to disclose to our California customers, upon request, the identity of any third parties to whom we have disclosed their Personal Information within the previous calendar year, along with the type of information disclosed, for the third parties' direct marketing purposes. To make such a request, please write us at privacy@atlascorps.org.

# Copyright

The site and all content, except where noted, are the copyright of Atlas Corps, the service mark of Atlas Service Corps, Inc. a 501(c)(3) nonprofit organization and may not be used or reproduced without expressed written consent of the organization.