

Privacy Notice

Surveillance Technology Oversight Project, Inc. (“STOP”) is committed to ensuring the privacy of all our users. This privacy notice (the “Privacy Notice”) represents our commitment as an organization to your right to privacy, giving you a clear explanation about how we use your information and your rights over that information.

This Privacy Notice applies to all online systems offered to the public by STOP, including our website www.stopspying.org and other websites and applications we operate.

References to “we”, “us” and “our” are to STOP, registered as a non-profit corporation in Delaware.

Our full contact information can be found at the end of this Privacy Notice. This Privacy Notice was last updated on June 7, 2019.

1. What data is covered by this Privacy Notice?

This Privacy Notice covers all personal data processed by STOP, which means information (either in isolation or in combination with other information) that enables STOP to identify you directly or indirectly. This includes the types of information set forth below.

2. What data do we collect from you?

a. Information we receive from you. We may collect personal data (such as your name, postal address, telephone number, nationality, email address, payment card information, social media handles, or other personal characteristics or preferences) that you provide when you interact with us such as when you:

- i. donate to STOP (e.g., bank or credit card details);
- ii. apply for any employment or internship opportunity with STOP;
- iii. register for or attend any STOP events or volunteer opportunities;
- iv. purchase products from any of our websites;
- v. request training from STOP;
- vi. sign a petition;
- vii. request legal services from STOP;
- viii. sign up for an email distribution list, marketing list or other marketing initiatives; and

- ix. contact us (e.g., via phone, email, SMS, fax) and subsequently correspond with us.

b. Information we collect about you. We may collect personal data and other information about you from the following sources:

- i. your customer transactions trail and donation and purchase history;
- ii. your social media interactions with us (e.g., if you “like” or “share” something that you see on our social media platforms);
- iii. your use of our website and other third-party websites on which you may see our advertisements. In particular, we may collect:
 - 1. technical information, including your IP address, browser type and version, device identifier, location and time zone setting, network and/or service provider, operating system and platform, page response times, and download errors;
 - 2. information about your visit, including the websites you visit before and after our websites and products you viewed or searched for; and
 - 3. lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

To learn more about why we use cookies or similar digital tracking technologies (used to collect the information above), please see Section 4 below titled “**How do we use cookies?**”.

- iv. your interactions with our marketing emails to measure marketing effective (e.g., we collect information about whether and when you have opened an email from us, and if you have clicked a link in the email or forwarded the email);
- v. your interactions with our online advertisements to measure the effectiveness of the advertisements; and
- vi. information we draw from our sources listed above and information we obtain from third parties (including publicly available information) where we have a legal basis to do so. We combine all this information to better understand who you are, your preferences etc. to enhance your customer experience with us (as described in the Section 3 below titled “**How do we use your personal data?**”).

- c. **Social media.** We may interact with you through our social media platforms as necessary for our legitimate interests to expand and retain our donor database and promote our activities, programs and mission via social media.

There are two ways to prevent this use of your data. You can either update your preferences regarding STOP by opting out of the relevant channel of communication or you can do this via the applicable social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Instagram: <https://help.instagram.com/1415228085373580>

Updating your preferences with STOP will not guarantee that you never see STOP content on social media, since the social media site may select to show you such content based on other criteria and without your data having been provided by STOP.

- d. **Special categories of personal data.** When you provide your data in relation to legal services or advice, we may ask for information about your racial or ethnic origin and/or religious or philosophical beliefs, which are considered “special categories of personal data” under applicable data protection laws. We collect and process such data in order to ensure that we provide appropriate legal services to you. Clear notices will be given when special categories of personal data are collected, and we will delete such data when it is no longer relevant.

3. How do we use your personal data?

| We use your personal data for the following purposes: | Based on the following justification: |
|---|--|
| Process your donations and online payments. | Necessary to complete your donation and purchases. |
| Respond to any request related to a product purchase or donation. | Necessary for our legitimate interest to establish or maintain a relationship with you. It is also in your interest to receive a response from us when you contact us. |
| Customize training that you have specifically requested. | Necessary for our legitimate interest to train volunteers and promote public awareness of the discriminatory impact of surveillance technology. |
| Monitor the effectiveness of our advertising and email marketing campaigns. | Necessary for our legitimate interest to improve our marketing strategy, expand our donor base and retain current donors, and better allocate our marketing resources. |

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| Contact you with communications such as emails, or by SMS (if you provide such information) to tell you about opportunities to donate, volunteer and related campaigns. | With your consent where this is required by applicable law. Where your consent is not required by law (depending on the means of communications used and jurisdiction), this data use is necessary for our legitimate interest to let you know about opportunities to support our mission. You may withdraw your consent and opt-out at any time, free of charge. |
| Perform research and conduct surveys about our donor and volunteer experience. | Necessary for our legitimate interest to improve our donor and volunteer experience. |
| Provide legal services | Necessary for our legitimate interest to establish and maintain a relationship with you as a client. |
| Interact with you through our social media platforms, measure the effectiveness of our social media campaigns and perform some of the purposes above (e.g., advertising) via social media. | Necessary for our legitimate interest to expand and retain our donor and volunteer base and promote our mission via social media. |
| Enable your voluntary participation to our social media campaigns, including the use of your images. | Necessary for our legitimate interest to expand and retain our donor and volunteer base and promote our mission via social media. |
| Enable a corporate transaction such as a merger or acquisition whereby data assets must be merged or transferred as part of the transaction. | Necessary for our legitimate interest to reorganize and support the expansion of our mission. |
| Respond to or address requests from law enforcement bodies, regulators or other public authorities, such as the Internal Revenue Service. | Necessary to comply with legal requirements. |

Where we rely on the necessity for a legitimate interest to use your personal data, we will do so solely on the basis of a previous thorough assessment of our legitimate interest against your privacy rights and we will carefully conduct a balancing exercise to ensure that our data processing is proportionate to your rights.

4. How do we use cookies?

We use cookies to improve website performance, to remember user preferences and settings, and to collect analytic data. “Cookies” refer to small text files placed on to your computer by websites you visit. “Cookies” may also refer to local storage, which is a mechanism similar to cookies where the information is stored within your web browser.

For example, we may use cookies as follows:

- a. **Website Performance.** Website performance cookies allow us to make our website easier and more pleasant to use. They may enable us to, for example:
 - i. Determine how often and where you see our news alerts or promotions; and
 - ii. Save you time when filling out a form by populating it with information you provided in previous visits.

- b. **Analytics.** We use analytics cookies to give us a better understanding of how people engage with our website. That in turn allows us to gauge the current performance of website features, and to develop better content. Analytics cookies provide us with information like:
 - i. How many individual visitors we have;
 - ii. How many visitors are new or returning;
 - iii. How often visitors come to the website;
 - iv. What content they've visited; and
 - v. How visitors interact with particular pages or content.

In addition, if you click on a link in an email we send to you — for example, to sign a petition or make a donation — a cookie may be generated that enables us to identify the action you have taken.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The “Help” feature on most browsers provides information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

Do Not Track: Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We use technology that recognizes DNT signals from your web browser and therefore we respond to DNT signals.

5. How certain content hosts may place cookies and gather information about you?

Our site is connected in a variety of ways to content residing on other platforms. We provide links to content on social media platforms such as Facebook and Twitter, and to content on other sites, such as articles posted on the sites of news organizations. Our site also features embedded media, such as videos, that are hosted on other platforms (such as YouTube) but viewable directly through the buttons we provide. When you click on links or buttons for any of these types of external content, the providers of that content may place their own cookies on your computer, access existing cookies that were set when you previously visited other websites, or otherwise gather information about you as you access their content.

To learn about how those content hosts treat the data they collect through cookies and otherwise, see their respective online privacy policies and other posted guidance.

6. With which third parties do we share your personal data?

Your personal data may be shared with third parties in certain circumstances. We may share your personal data with the following categories of data recipients:

- a. Affiliates.** We may share your personal data among our subsidiaries, head office and branches, in order to provide you services and support, process your donations and payments, understand your preferences, send you information about opportunities to donate and volunteer that may be of interest to you and conduct the other activities described in this Privacy Notice.
- b. Service providers.** We may share your personal data with other companies, agents or contractors to perform services on our behalf or to assist us with the provision of services to you. We may share personal data with the following categories of service provider:
 - i. information technology service providers;
 - ii. marketing, advertising and communications providers;
 - iii. online payment and fraud prevention service providers;
 - iv. delivery / logistics service providers (for home delivery of products you have purchased online);
 - v. external advisers (e.g., lawyers, social media consultants); and
 - vi. website testing / analytics service providers (e.g., cookie analytics providers).

In the course of providing such services, these service providers may have access to your personal data. However, we will only provide our service providers with personal data which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will require that all our service providers keep your personal data secure to the same degree that we do. Where possible, we also take steps to limit the ability of such third parties to retain data about our users.

- c. Third parties.** In certain circumstances, we may be required to disclose or share your personal data in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal data to the police, regulators, government agencies or to judicial or administrative authorities). We may also disclose your personal data to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

If we are required by law to disclose the information that you have submitted, we will attempt to provide you with prior notice (unless we are prohibited or it would be futile) that a request for your information has been made in order to give you an opportunity to object to the disclosure. We will attempt to provide this notice by email, if you have given us an email address, or by postal mail if you have entered a postal address. If you do not challenge the disclosure request, we may be legally required to turn over your information.

In addition, we will independently object to requests for access to information about users of our site that we believe to be improper.

- d. Third parties in connection with corporate transactions.** We may transfer your personal data to third parties in connection with a reorganization, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with all applicable data protection laws.

Please note our website may, from time to time, contain links to and from the websites of our partners or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we have no control over how they may use your personal data. You should check the privacy policies of third party websites before you submit any personal data to them.

7. Cross-border personal data transfers

We may share personal data with third parties situated or operating within the European Economic Area (“EEA”) and Switzerland, and those third parties may transfer personal data outside of those regions, including to territories which do not provide a level of protection equivalent to the data protection standards in those regions. Such cross-border personal data transfers will be conducted in accordance with applicable data protection laws, such as the European Commission’s model clauses or any other valid data transfer mechanism. If you are in the EEA, you have a right to request copies of the relevant document for enabling such personal data transfers by requesting a copy of such document from STOP, using the contact information indicated below in Section 11.

8. What are your rights?

If you are in the EEA, you have the following rights:

- a. Access.** You have the right to request a copy of the personal data that we process about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.
- b. Rectification.** You have the right to have incomplete or inaccurate personal data that we process about you rectified in a timely manner. Please contact us using the details below to correct or update your information.

- c. **Deletion.** You have the right to request that we delete personal data that we process about you when that information is no longer necessary for its initial purpose and when you have clearly rescinded previously given consent, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- d. **Restriction.** You have the right to restrict our processing of your personal data where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- e. **Portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (i) personal data which you have provided to us, and (ii) if we are processing that data on the basis of your consent or to perform a contract with you.
- f. **Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.
- g. **Withdrawing Consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

9. How do we protect your personal data?

We have implemented technical and organizational security measures to safeguard the personal data in our custody and control. Such measures include, for example, limiting access to personal data only to employees and authorized service providers who need to know such information for the purposes described in this Privacy Notice, as well as other administrative, technical and physical safeguards.

Although we have implements such measures to protect our systems, websites, operations and information against unauthorized access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from unauthorized access, use, modification or disclosure by others.

We cannot be held responsible for the privacy of data collected by websites not owned or managed by STOP.

10. How long do we keep your personal data?

We will only retain your personal data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. When we no longer need to use your personal data, we will remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations).

11. How can you contact us?

If you wish to contact us or withdraw or change personal information you shared with us previously or adjust personal preferences — such as your preferences regarding email lists — you may contact us in the following ways:

By mail: 40 Rector Street, 9th Floor, New York, NY 10006

By email: info@stopspying.org

By link: Click on the link in the footer of any email you receive from STOP and follow the instructions provided.

If you believe we have not complied with applicable EU data protection laws, you may also contact the relevant supervisory authority in your respective jurisdiction. A list of these supervisory authorities and their contact information can be found at https://edpb.europa.eu/about-edpb/board/members_en.

12. Changes to this Privacy Notice

We reserve the right to change our Privacy Notice from time to time including where this is necessary due to changes to our data processing practices or activities. If we decide to materially change our Privacy Notice we will notify you of these changes via email where we have a direct relation with you and post an updated version on our website.