

# **Bottom Line Privacy Statement**

Effective as of March 1, 2023

Bottom Line is committed to protecting the personal information that you provide and entrust to us when using our website platforms.

This Online Privacy Statement describes how we treat data collected during your visit to Bottom Line web platforms. Bottom Line web platforms include the public facing website at bottomline.org, which may host organization content, including all web pages whose domain name contains bottomline.org, blog.bottomline.org, bottomline.org/learning, and any other websites which are operated by Bottom Line and link to this privacy statement.

Additionally, this is not the online privacy statement for websites operated by Bottom Line that do not contain these domain names and do not link to this online privacy statement. This privacy statement also does not apply to websites that Bottom Line may not operate, such as social pages on LinkedIn, Instagram, Twitter, and Facebook.

Please note, however, that this Privacy Statement provides for Bottom Line to share data collected on the Bottom Line Sites with its partners for use consistent with this Privacy Statement, which is described in more detail below, and that you may be redirected to one of our Sites when interacting with the website of our partners.

## Information We Collect

To advance our work, and to provide you with a holistic experience when interacting with Bottom Line, we rely on data collected from our sites. Data collected includes information that you provide directly and data on our websites that may be automatically received and recorded by us from your browser. This section outlines what data is collected, as well as information on how we use collected data.

#### Information That You Provide Directly

Certain pages on our websites may invite you to share personal information, such as your name, address, email address, telephone number, work authorization status, resume, cover letter, payment information to complete a transaction, or other information you provide when engaging with Bottom Line. Sharing this information is often necessary to: apply to any one of our academic opportunity programs, make a donation, apply to career opportunities, register for an event, become a Go Far volunteer, and sign up for our mailing list, receive our newsletters and/or emails, or update your contact information if it has changed.

#### Cookies and Optional Technology

Additionally, when you sign up for our email list(s), we may send you emails that include technologies to track open and click rates. For job application candidates, if you provide us with

personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us. We may also automatically receive and record information from your browser when you visit some of our websites. The information that we collect with these automated methods may include your Internet Protocol (IP) address assigned to the device you use to connect to the internet, browser type, system type, and the website you were visiting before you came to our site (referring URL). We may also use cookies on some of our websites for usage analytics to improve site performance, to remember user preferences and settings, and to collect other analytic data. "Cookies" are small text files that websites send to your computer or other internet-connected device to uniquely identify your browser or to store information or settings in your browser. "Cookies" allow us to recognize you when you return. In many cases, the information we collect is only used in a nonidentifiable way, without reference to personal information. These data collection efforts, support our operations and the security of our websites. For example, we use information we collect about website users to optimize the Careers Site and to understand website traffic patterns. In some cases, we associate the information we collect with your personal information. This Policy applies to the information when we associate it with your personal information.

## **Links to Third-Party Sites**

Our websites may contain content hosted by third parties, including links to other websites, social media platforms, and embedded media. When you access this content, including content that loads when you browse on the bottomline.org domain, third party content hosts may place tracking devices (e.g., cookies) on your computer, access existing tracking devices that were set when you previously visited other websites, or gather information about you as you access their content. When you click on links to social media sites and other third-party websites, you will leave our website. This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which any one of our websites links. To learn about how those third parties treat the data they collect through tracking devices and otherwise, see their respective online privacy policies and other posted guidance.

### Information We Use

We may use your data to process

- Job application, assess your capabilities and qualifications for a hob, conduct reference checks, respond to your inquiries and communicate with you about your job application, conduct background checks if we offer you a position, and for other administrative purposes necessary to conduct our business.
- Student applications you submit to join any one of our programs Access, Success, BluPrint
- Event registrations and other activities related to our career connections program
- Donations to Bottom Line
- Contact records for Bottom Line activities or news, or about opportunities to support us

We may also use your data to assess and improve the performance of our websites as well as investigate or maintain the stability and security of our websites. If we hire you, personal information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.

## Information We Disclose

We work with various managed services groups and service providers who help us undertake a variety of activities including processing student and staff data, managing and operating our websites, and supporting our external affairs (fundraising, and marketing programs). For example, service providers may help us analyze traffic on our websites, process donations to Bottom Line, or facilitate activities such as the collection and submission of job applications.

We allow some service providers to compile and use certain aggregated data for other purposes once it has been de-identified. This may include, for example, analyzing de-identified data to assess whether our students are on track to graduate on time, effectiveness of our Bottom Line programming, as well as/or allowing a service provider to take de-identified and aggregated data about activity on our website to inform and/or guide our outreach efforts. In these instances, we make these provisions when we have confirmation that the data will not be combined with other data to create any record about you as an identifiable individual.

Additionally, when you submit a job application through our site, we may share personal information with affiliates and/or partners that are involved in evaluating candidates for a given position. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying. We may share personal information with third-party service providers who provide services such as hosting and operating the Careers Site, recruiting assistance, background check processing, and similar services.

#### Mandatory Disclosure

We may share your information to third parties, if we are required to do so under the following conditions: (a) under applicable law, including laws outside your state of residence; (b) to comply with legal process not limited to a subpoena or court order; (c) to respond to requests from public and government authorities including public and government authorities outside your state of residence; (d) to protect our legal rights and operations or the rights, privacy, safety or property, and/or of us, our sites, you, or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain.

# Information Retention and Security

**Security** 

We take information security very seriously and have taken administrative measures to safeguard the data we collect and protect against unauthorized access to the data we collect via our websites. Additionally when we work with managed services groups or vendors whose technical products we use to capture and process information that can be linked to you personally, we require that the service providers have security measures and practices in place that prevent unauthorized access to your data, including assuring to keep that information confidential, use of information only for the purpose of carrying out the functions we have engaged it to perform, reviewing existing security technologies in place that safeguard your data (e.g. PCI compliance for credit card data, AES encryption for sensitive data). While we use reasonable technical and administrative measures to protect personal information, we know that unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance via the "Contact Us" section. We hereby disclaim, as far as permitted by local laws, any liability for us and our affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to our Careers Site.

### **Retention:**

We keep your personal information for as long as needed or permitted considering the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you (such as a student or job application process); as required by a legal obligation to which we are subject; or as advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations). We may remove personal information for inactive accounts, subject to any applicable legal or regulatory obligations.

# **Updates to Policy**

This privacy policy may be amended at any time. We will post the revised policy changes on this page and, you can determine when they policy was revised by referring to the "Last Updated" legend at the top of this policy. Any changes will become effective upon the posting of the revised Policy on our website.