



# IMMIGRANT & REFUGEE LAW CENTER

KNOWLEDGE. EMPOWERMENT. JUSTICE.

## PRIVACY POLICY Effective Date: October 22, 2022

### Overview and Scope

We at the Immigrant & Refugee Law Center (“IRLC,” “we,” “our,” or “us”) recognize the importance of protecting the privacy of personally identifiable information (“**Personal Information**” or “**PII**”) collected about you and other volunteers, donors, clients, and friends (collectively, “**Users**”) that visit our website (the “**Site**”). We are committed to ensuring that your privacy is protected. To that end, this Privacy Policy (“**Policy**”) discloses our practices regarding the collection, use, and disclosure of the PII we receive through Users’ use of the Site. Unless otherwise expressly agreed to in writing, your Personal Information will be processed according to the terms of this Policy. By using the Site, you accept the terms of this Policy.

This Policy applies to the Site, which includes our website, <https://irlawcenter.org>, its subdomains, and all of the websites and internet properties owned or operated by us, regardless of the medium by which the Site is accessed by Users (e.g., via a web or mobile browser).

### Information We Collect

We are the sole owner of information collected on the Site. We collect several types of information from and about Users of the Site, including:

**Personal Information:** We may collect PII from you when you fill out volunteer, intern, or consultation forms, complete applications, respond to surveys, navigate web pages, and in connection with other activities, services, features, or resources we make available on the Site. PII means any information that is linked or reasonably linkable to an identified or identifiable natural person. PII does not include publicly available information from government records, deidentified or aggregate information, or information excluded from the scope of applicable laws.

The types of PII we may collect, use, store, and disclose include the following categories of information:

Category	Type of Information
Contact Information and Identifiers	First Name, Last Name, Email, Phone Number, Date of Birth, IP Address, Postal Address
Financial Information	Credit/Debit Card Number, Expiration Date, Security Code
Internet Identifiers and Activities	Browsing History, Search History, Interactions with the Site
Sensitive PII	Racial or Ethnic Origin, National Origin, Citizenship or Immigration/Green Card Status, Alien Registration Number  If you choose to request an Initial Consultation, we may ask that you provide Sensitive PII about yourself and your family member(s).

Other Information	Number of Children, Ages of Children, Children's School, Date of Entry into the U.S., Detention History, Immigration Court History, Immigration Application History, Internship and Volunteer Area of Interest, Academic and Professional Details, Law Firm, Area of Legal Expertise, State of Law License
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**Deidentified Information:** We may collect deidentified information from you that may not by itself reasonably identify you as the source when you navigate the Site ("**Deidentified Information**"). Deidentified Information may include: (i) device type, (ii) device operating system, (iii) internet browser type, (iv) internet service provider, (v) referring/exit pages, (vi) date/time stamp, and (vii) clickstream information. We will take reasonable measures to ensure that Deidentified Information we collect is not personally identifiable and may not later be easily used to identify you as required by applicable law.

### **How We Collect Information**

The information we collect depends on what Users do when they visit or utilize the Site. We collect PII and Deidentified Information in various ways, including:

**Directly from You:** We collect PII when you voluntarily submit PII to us while completing forms or surveys on the Site and in connection with other activities, services, features, or resources we make available on the Site. The PII we collect depends on what you do when you visit or utilize the Site or how you choose to communicate with us. Below are examples of how we collect PII directly from you:

- **Volunteer Application:** We may collect PII when you voluntarily submit PII to us while completing the IRLC Volunteer Application. We may collect PII such as your name and email address in addition to information about your availability and volunteer preferences.
- **Initial Consultation Form:** We may collect PII when you voluntarily submit PII to us while completing the Initial Consultation Form. If you choose to request an initial consultation with IRLC, we may collect PII including information regarding your home country, number of children, their ages, and school, your date of entry into the United States, any detention and immigration court history, immigration application history, and citizenship or Green Card status.
- **Survey Responses:** We may collect PII when you voluntarily complete informational surveys sent to you by IRLC. We often utilize the Google Surveys service to assist us in executing our surveys. For more information about Google Surveys' privacy practices, you may visit: <https://policies.google.com/privacy?hl=en-US>.

**Through Your Use of the Site:** We may collect PII and Deidentified Information that your browser transmits when you visit the Site. We may also collect Deidentified Information about how you access and interact with the Site through the use of automated tracking technologies, such as session cookies, persistent cookies, and web beacons.

A cookie is a small data file that is transferred to an internet browser, which enables the Site to remember and customize your subsequent visits. We may use session cookies to make it easier for you to navigate the Site. Session cookies expire when you close your browser. We may also use persistent cookies to track and target your interests to enhance your experience on the Site. Persistent cookies remain on your device for an extended period of time.

We use tools, including Google Analytics, to collect Deidentified Information regarding your use of the Site. For more information about Google Analytics, you may visit <https://policies.google.com/technologies/partner-sites>.

Most internet browsers automatically accept cookies. However, you can instruct your internet browser to block cookies or to provide you with a warning prompt before you accept cookies from the Site. Please

refer to your internet browser's instructions to learn more about these functions. If you reject cookies, the functionality of the Site may be limited and you may not be able to participate in several of the Site's features.

Additionally, we may use web beacons, which are single-pixel, electronic images embedded in the Site that allow us to gather information about your browsing activities on the Site.

From Third Party Services: We may collect PII about you from third parties whose privacy practices may differ from the practices described in this Policy. We do not make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available through third parties. Your use of third parties' services and/or third party websites is governed by and subject to the terms and conditions of those third parties and/or third party websites. We encourage you to carefully review the privacy policies and statements of such third parties and/or third party websites.

### **How We Use Information**

We may use Users' PII for lawful business purposes to help enhance Users' experience. These purposes include:

Delivery of Services: We may also use your PII and/or Deidentified Information to provide the services offered on our Site.

Communications with You: We may use your PII to send you information that you have requested regarding IRLC and its activities. We may also use your PII to contact volunteer attorneys and to manage volunteer activities. We may further use your PII and/or Deidentified Information to help us respond to your inquiries, questions, requests, and support needs more efficiently.

Direct Marketing: We may use your PII to send you promotional materials, such as the Immigrant & Refugee Law Center Newsletter, or information about past or future IRLC events. You have the right to opt-out of receiving direct marketing.

User Experience Personalization: We may use your information to personalize the Service to your interests and preferences. We may also use Users' PII and/or Deidentified Information in the aggregate to analyze Users' browsing and usage activities and patterns in order to understand Users' interests and preferences with respect to the Site and our services. This will help us optimize your experience on the Site.

Business Optimization: We may use your PII and/or Deidentified Information to improve the content on our web pages, to customize the content and layout of our web pages, and in managing our everyday business needs, such as administration of our services on behalf of IRLC members and communication with our volunteers, donors and friends. We may also use your feedback to improve the Site and our services. All of this is done with the intention of making the Site more useful for you.

Safety and Security: We may use your PII and/or Deidentified Information to promote the safety and security of the Service, our users, and other parties. For example, we may use the information to authenticate users, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.

We will not collect additional categories of PII or use PII we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **How We Disclose Information**

We may disclose Users' PII to third parties for a business purpose as described below. Otherwise, we do not sell or rent PII and will not disclose Users' PII to third parties without your permission.

To Our Affiliates: We may disclose your PII to affiliates, including official IRLC sponsors and partners in order to carry out our programming and events, and to otherwise provide IRLC services to you and your family.

To Service Providers: We may disclose your PII to third party service providers, volunteers, and vendors that assist IRLC in providing user support, communicating with Users, and promoting our services, as well as third party service providers that provide other services to us relating to our services and/or the Site.

Law Enforcement, Safety, and Legal Processes: We may disclose your PII to law enforcement or other government officials if it relates to a criminal investigation or alleged criminal activity. We may also disclose your PII: (i) if required or permitted to do so by law; (ii) for fraud protection and credit risk reduction purposes; (iii) in the good-faith belief that such action is necessary to protect our rights, interests, or property; (iv) in the good-faith belief that such action is necessary to protect your safety or the safety of others; or (v) to comply with a judicial proceeding, court order, subpoena, or other similar legal or administrative process.

Sale or Acquisition of Assets: If we become involved in a transaction involving the sale of our assets, such as a merger or acquisition, or if we are transferred to another company, we may disclose and/or transfer your PII as part of the transaction. If the surviving entity in that transaction is not us, the surviving company may use your PII pursuant to its own privacy policies, and those policies may be different from this Policy.

## **Security**

The security and confidentiality of your PII is very important to us. We use commercially reasonable security measures to protect your PII on the Site. However, no data transmitted over or accessible through the internet can be guaranteed to be 100% secure. As a result, while we attempt to protect your PII, we cannot guarantee or warrant that your PII will be completely secure (i) from misappropriation by hackers or from other nefarious or criminal activities, or (ii) in the event of a failure of computer hardware, software, or a telecommunications networks.

## **California Privacy Rights**

California's "Shine the Light" law permits Users of the Site that are California residents to request certain information regarding our disclosure of PII to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Information provided below.

## **Data Retention**

We will retain Users' PII while they are engaged with IRLC as a volunteer or as an IRLC client, or to the extent necessary to provide the services through the Site. Thereafter, we will keep PII for as long as necessary: (i) to respond to any queries from Users; (ii) to demonstrate we treated Users fairly; (iii) for ordinary business continuity procedures; or (iv) to comply with any applicable laws. We delete PII within a reasonable period after we no longer need the information for the purposes set out in this Policy.

## **Do Not Track Disclosure**

Some internet browsers may transmit "do-not-track" signals to websites with which the browser communicates. The Site does not currently respond to these "do-not-track" signals.

## **SPAM**

We do not participate in bulk email solicitations that you have not consented to receiving (i.e., “Spam”). We do not sell or disclose customer lists or email address lists to unrelated third parties. Except as otherwise provided herein, we do not share PII with any third party advertisers.

## **Third Party Links**

The Site may contain links to other websites or applications (“**Linked Sites**”) that are not owned by IRLC. We do not control the collection or use of any information, including PII, which occurs while you visit Linked Sites. Therefore, we make no representations or warranties for—and will not in any way be liable for—any content, products, services, software, or other materials available on Linked Sites, even if one or more pages of the Linked Sites are framed within a page of the Site.

Furthermore, we make no representations or warranties about the privacy policies or practices of the Linked Sites, and we are not responsible for the privacy practices of those Linked Sites. We encourage you to be aware of when you leave the Site and read the privacy policies of Linked Sites.

## **Modifications**

We reserve the right to update this Policy from time-to-time at our sole discretion. If our privacy practices change materially in the future, we will post an updated version of the privacy policy to the Site. It is your responsibility to review this Policy for any changes each time you use the Site. We will not lessen your rights under this Policy without your explicit consent. If you do not agree with the changes made, we will honor any opt-out requests made after the Effective Date of a new privacy policy.

## **Accessing, Updating, and Controlling Information**

If you ever wish to access, update, change, delete, or otherwise control your PII, you may do so by contacting us at the Contact Information provided below. To help us process your request, please provide sufficient information to allow us to identify you in our records. We reserve the right to ask for additional information verifying your identity prior to disclosing any PII to you. Should we ask for verification, the information you provide will be used only for verification purposes, and all copies of the information will be destroyed when the process is complete.

If you do not wish to receive update messages and/or direct marketing communications from us, you may opt-out by (i) following any instructions included in the communication or (ii) contacting us at the Contact Information provided below. Please be aware that although you may opt-out of update messages and/or direct marketing communications, we reserve the right to email you administrative notices regarding the Site, as permitted under the CAN-SPAM Act.

We will make commercially reasonable efforts to respond to opt-out requests and handle requests to access, update, change, delete, or otherwise control your PII as quickly as possible.

## **Contact Information**

If you have questions about this Policy or wish to contact us with questions or comments, please contact us at:

Immigrant & Refugee Law Center  
PO Box 27012  
Cincinnati, Ohio 45227  
513-828-0577  
info@irlawcenter.org

**Effective Date**

This Policy was last modified as of the effective date printed above. This version of the privacy policy replaces and supersedes any prior privacy policies applicable to the Site.