

# PRIVACY POLICY<sup>1</sup>

Tricontinental (“Tricontinental,” “we,” “our,” “us”) is committed to protecting the privacy and security of the data of its website users and content contributors. We want you to understand how we collect and use information from our website so you can interact with us with confidence.

This Privacy Policy does not apply to any information collected outside of the Site, including offline or through other means (for example, via telephone or through mail), unless otherwise stated below.

By using our website (“Site”), you accept and agree to the practices this Privacy Policy describes.

## Information We Collect

When you use our Site, we may collect and use personally identifiable information about you, as well as other information. “Personally identifiable information” includes your name, address, email address, and other similar information that can be used to identify you. We also may collect usage information, which is information generated automatically as you navigate through our Site. More specifically, when you use our Site, we may collect the following information:

- Details of your visits to our Site and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data, including your IP address, browser type, the date and time you accessed or left the Site, and which pages you viewed. Currently, our Site does not use cookies, pixel tags (also known as “web beacons”), or other technologies to collect information about your general internet usage. See the section below called “How We Use Tracking Technologies” to learn more.
- Information that you provide directly to us by filling in forms on our Site, if any, which may include your name, email address, street address, telephone number, or other information.

If you donate to us, credit card and associated billing information that you provide directly to us by filling in forms on our Site. This information may include credit card details such as a card number, expiration date, security code, billing name, and billing address.

- Information provided to us when you communicate with us for any reason, including information you provide in emails you send us.
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**1** This policy should be reviewed periodically to comply with any applicable legal or regulatory updates.

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## **How We Use Tracking Technologies**

We and/or our vendors, consultants, agents, and other service providers (collectively, “Service Providers”) may collect and store your usage information in log files as well as through the use of cookies, pixel tags, embedded scripts, and other tracking technologies existing now or hereafter developed (“Tracking Technologies”).

### *Cookies*

A “cookie” is a small file that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Keep in mind, however, that some website features or services may not function properly without cookies.

### *Pixel Tags*

A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking activity on websites, or when emails are opened or accessed, and is often used in combination with cookies.

While we use cookies and pixel tags, it is not our intent to track our users across websites or over time.

## **“Do Not Track” Requests**

Our Site currently does not respond to “do not track” or similar signals.

## **Use of Your Information**

We use the information we collect from you primarily to enable us to provide our services to you in the best possible manner. In addition, your information may be used for the following purposes:

- To provide you, including via your email address, with information relating to our services;
- To deliver newsletter to you through your email; and
- To administer our Site, including by monitoring and analyzing user engagement with the Site traffic and usage patterns.

## **Security**

We use commercially suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect on our Site. These procedures include, but are not limited to, firewalls, encryption, intrusion detection, and Site monitoring. We

also limit access to any personally identifiable information we receive to persons engaged by the Tricontinental who need access to that information in order to their jobs. However, no data protection procedures are entirely infallible. As a result, while we strive to protect your personally identifiable information, we cannot guarantee that it will be 100% secure. Your transmission of your data to our Site thus is done entirely at your own risk.

### **Sharing Your Information**

We may share your personal information as follows:

We may share your personal information with trusted third parties to:

- Compile statistics and reports regarding our audience and the users of our Sites, products, and services;
- Deliver interest-based notices to you targeted to the interests identified through your activities on the Site;
- Process payments for donations, if you donate to us online.

Such third parties have access to personal information as needed to perform their functions, but they are not allowed to use it for other purposes. We do not sell or rent personal information collected through our Site to anyone. All third-party services providers process your personal information only on Tricontinental's behalf and are bound by contractual terms that are compliant with data protection law.

When you provide us with personal information we also may use and share your personal information to contact you, including via email, to thank you for providing your request, to conduct satisfaction surveys, or for other administrative purposes related to your request.

In the event that you provide credit card payment information for the purpose of making a donation to Tricontinental, such information will be stored in a confidential manner and will only be utilized for the purpose of processing a donation that you authorize. Where submitted, your card details may be disclosed to banks or relevant financial institutions to arrange payments. In the case of a suspected fraudulent transaction, your details may be further disclosed for the sole purpose of performing further checks (for example, including but not limited to, disclosure to a credit checking agency).

*Other Circumstances:* We may disclose your personal information to third parties if we are involved in a merger, acquisition, or sale of any or all of our business and/or our assets to a third party, or if we have a good faith belief that disclosure is necessary to:

- comply with applicable laws, regulations, legal process (such as a subpoena), or enforceable government request;

- enforce applicable Terms of Service, including investigation of potential violations of such Terms, or to detect, prevent, or otherwise address fraud, security, or technical issues; and
- protect against harm to the rights, property, or safety of Tricontinental, our authors, employees, directors, subscribers, or the public as required or permitted by law.

### **Third Party Websites**

Our Site may contain links to other sites, including those of third parties or business partners. While we seek to link only to sites that share our high standards and respect for privacy, we cannot be responsible for the privacy practices other websites use. By

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accessing other third party websites or applications through our Site, you are consenting to the terms and privacy policies of those websites. It is possible that other parties may collect personally identifiable information about your online activities over time and across different web sites when you use our Site.

### **International Visitors and the Privacy Shield**

Our Site is hosted and operated in India and the United States (“US”). By using the Site, you are consenting to the transfer of your personal information to India and the US. If you are accessing our Site from outside India or the US, please be advised that Indian law or US law may not offer the same privacy protections as the law of your jurisdiction.

### **Review and Correction of Your Information**

You may review and edit the information we collected about you at any time by contacting us at the addresses below. If your information has been shared with a third party, as described elsewhere in this Privacy Policy, then that third party has received its own copy of your data. If you have been contacted by one of these third parties and wish to correct or delete your information, please contact them directly.

### **Retention period for data**

We only hold your personal information on our systems for as long as is necessary for the purposes outlined above. We remove personal data from our systems once it is no longer required, in line with our guidelines on how long important information must remain accessible for future use or reference, as well as when and how data can be destroyed when it is no longer needed.

The length of time each category of data will be retained will vary depending on how long we need to process it for, the reason it was collected and in line with any statutory requirements. After this time the data will either be deleted or we may retain a secure anonymized record for research and analytical purposes.

### **California Privacy Rights**

California law allows California residents to ask companies with whom they have an established business relationship to provide certain information about the companies’ sharing of personal information with third parties for direct marketing purposes. We do not share any California consumer personal information with third parties for marketing purposes without consent.

California customers who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices may contact us using the contact information set forth below.

### **Users Only of Legal Age of Majority**

Our Site is designed and intended for those who are at least 18 years old. By using our Site, you affirm that you are at least 18 years of age or older. We are not liable for any damages that may result from a user’s misrepresentation of age. No one under age 13 is authorized to submit any information, including personally identifying information, on

our Site. Under no circumstances may anyone under age 13 use our Site. Parents or legal guardians of children under 13 cannot agree to these terms on their behalf.

**Privacy Policy Updates**

This Privacy Policy was last updated on June 14, 2019.

We update the Privacy Policy from time to time, so please review it regularly. If we materially change our Privacy Policy, we will notify you by contacting you through your e-mail address (if previously provided) or by posting a notice on our Site. Your continued

use of the Site will be deemed your agreement that your information may be used in accordance with the new policy. If you do not agree with the changes, then you should stop using the Site and notify us that you do not want your information used in accordance with the changes.

### **Contacting Us**

We welcome any questions, comments, or complaints you may have regarding this Privacy Policy. Please do not hesitate to contact us by email at [contact@thetricontinental.org](mailto:contact@thetricontinental.org).