

# CCPA CONSUMER PRIVACY RIGHTS POLICY

## **Institute for Advertising Ethics**

We respect your privacy rights under California law and the laws of the United States as well as its various states and localities. We are committed to protecting the rights given to consumers, including California consumers with whom we do business regarding their personal information. This document provides you with a description of our business practices, both online and offline, regarding the collection use, disclosure, and sale of personal information and of the rights of consumers regarding their own personal information. The terms used in this policy have the meanings used in the California Act.

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

California defines personal information as “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” It includes identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, social security number, driver’s license number, passport number or anything similar. Personal information does not include deidentified or aggregate consumer information or information that is lawfully made available from federal, state, or local government records. (Cal. Civ. Code § 1798.140(o)).

### **Personal Information We Collect:**

We collect the names and associated email addresses of individuals who work for or on behalf of organizations that are or seek to become members of the IAE or of organizations with whom we work in providing membership services. We also collect the names, email addresses, and payment information of or from individuals or organizations that seek IAE certifications. We do not share this information other than to obtain payment from financial institutions for authorized transactions. We do not sell or share this information other than as stated. The following describes what categories of personal information we have collected over the past 12 months, how we collected that information, the business purposes for which we generally use such information, and which types of trusted third-party service providers we may share that information with:

**For Course Registration**, we may collect your name, email address, and payment information. This information is given directly by the consumer and is held in our course management system, Canvas, or our payment management system, Squarespace. For more information on how Canvas may use your information, visit their policy here: <https://www.instructure.com/canvas/privacy> For more on how Squarespace handles your data, follow this link: <https://www.squarespace.com/privacy>

**For our Newsletter**, we may collect your name and email address. This information is given directly by the consumer.

**For Donations**, we may collect your name, email address, and payment information. This information is given directly by the consumer and is held in our payment management system, Squarespace. For more on how Squarespace handles your data, follow this link: <https://www.squarespace.com/privacy>

All of the information we collect is provided directly by the consumer

## **How We Share Personal Information**

We do not sell the personal information we collect to third parties.

We may share personal information in the following situations:

- **Business Transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that the company or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- **Legal Compliance and Law Enforcement:** We may be required to share your personal information in other limited circumstances. For example, we may be required to share certain information to respond to a subpoena or similar judicial process, to comply with state, federal or local laws, to protect the security or integrity of our databases or website, to take precautions against liability, in the event of a corporate reorganization or, to the extent required by law, to provide information to law enforcement agencies. Additionally, your information may be transferred to another organization if, for example, we transfer the ownership or operation of the Sites because we have merged with or have been acquired by another organization, or if we liquidate our assets. In those cases, the new company's use of your information will still be subject to this policy and the privacy preferences you have expressed to us.
- **Payment Processing:** Your payment information is shared with our payment management system, Squarespace. This information is only directly provided by the consumer when completing payment for donation, or for course registration. For more on how Squarespace handles your data, follow this link: <https://www.squarespace.com/privacy>
- **Educational Partnerships:** We partner with institutions of higher learning for educational purposes, some of which offer credit for students taking our course. In these cases, we may share your personal information with faculty members of these institutions for the processing of academic credit.

## **Information From Children Under Age 16**

We do not knowingly do business with children under 16 years of age. If you are under the age of 16, do not use our services or provide any information to us. If we learn we have collected or received the personal information of a child under the age of 16 without verification of parental consent, we will delete that information. If you believe that we might have any information concerning children under 16 years of age without such consent, please contact us at [info@iaethics.org](mailto:info@iaethics.org).

## **How We Protect Your Personal Information**

In addition, we offer the following security measures to protect your personal information:

We use a secure payment method, Squarespace, to process payment for our certifications and donations. Squarespace may retain your payment information for financial records, and for authorized transactions. For more on how Squarespace handles your data, follow this link: <https://www.squarespace.com/privacy>

We retain a list of users who take our certifications, in the form of names and email addresses. This information is kept within our certification management system, Canvas, and on internal IAE systems.

For more information on how Canvas may use your information, visit their policy here:

<https://www.instructure.com/canvas/privacy>

We continue to work on features to keep consumer information safe, by ensuring our employees stay up to date with internet safety, and not allowing non-employees access to internal IAE systems, or admin access with our third-party partners.

## **Your Rights Regarding Your Personal Information**

### **Access to Specific Information**

- You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
  - The categories of personal information we collected about consumers.
  - The categories of sources for the personal information we collected about consumers.
  - Our business or commercial purpose for collecting or selling that personal information.
  - The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **Data Portability Rights**

- You have the right to request the specific pieces of personal information we collected about you (also called a data portability request). Once we receive and confirm your verifiable consumer request, we will provide you with access to a copy in a readily useable format.

### **Deletion Request Rights**

- You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.
- We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:
  - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

- To exercise the access, data portability, and deletion rights described above, you must submit a verifiable consumer request to us by following the instructions found at <https://www.iaethics.org/contact>. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.
- You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:
  - Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
  - Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Response Timing and Format**

- Upon receiving a request to know or a request to delete, we will confirm receipt of the request within 10 business days and provide information about how we will process the request. The information provided will describe in general our verification process and when you should expect a response, except in instances where we have already granted or denied your request.
- We will respond to requests to know and requests to delete within 45 calendar days. If we cannot verify your request within the 45 day time period, we may deny your request. If necessary, we may take up to an additional 45 calendar days to respond to your request, for a maximum total of 90 calendar days from the day the request is received.

- If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

- We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Personal Information Sales Opt-Out and Opt-In Rights**

- If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers THAT we know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age or the parent or guardian of a consumer less than 13 years of age. Consumers who opt in to personal information sales may opt out of future sales at any time. To exercise the right to opt out, you (or your authorized representative) may submit a request to us by following the instructions found at <https://www.iaethics.org/contact>.

- Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by visiting our website and sending us a message. We will only use personal information provided in an opt-out request to review and comply with the request.

### **Non-Discrimination**

- We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

- Provide you with a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

- However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires prior opt-in consent, which you may revoke at any time.

- California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please follow the instructions found at <https://www.iaethics.org/contact>.

### **Changes to Our Privacy Notice**

- We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this policy, the ways in which we collect and use your information described herein, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us as follows:

By email to the following email address: [info@iaethics.org](mailto:info@iaethics.org)