

## Privacy Policy

Effective 9/22/2020

This Privacy Policy describes how the National Center for Learning Disabilities (“NCLD”) collects, uses, and shares information, including personal information, when you use **LD Connect** (our “Service”).

The Service is a social network that allows young adults with disabilities to connect with each other online, communicate using our service, participate in polls, find jobs, ask questions, and publish blogs.

This Policy applies when you interact with us through the Service. It does **not** apply to other NCLD websites and services, which are covered by our [website privacy policy](#), or non-Service websites and mobile applications that may link to the Services or be linked to from the Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

### 1. Information We Collect

#### *1.1. Information you give us*

We collect the content, communication, and other information you provide – including information you may provide about other people – when you use the Service. This information includes:

- The content you provide, such as your posts and any media you upload to the Service.
- Personal identifiers, such as contact information you provide during account registration and photographs. Please be aware that photographs may contain metadata such as the date the photo was taken and its location.
- Demographic information such as your age, gender, race, ethnic origin, or sexual orientation.
- Health information, such as information about any disabilities you may have.
- Location information derived from your IP address.
- Professional, employment, or education information, such as where you work, job title, and education history.
- Content of your communications, such as email or other correspondence you may send to us.
- Your networks and connections, such as which communities or groups you are a part of.
- Your responses to our surveys.

If you respond to a request from us to make a donation, you may be transferred out of LD Connect to process the donation.

**Please be very careful if you choose to share information about yourself, as it may be visible to others.**

**If you choose to disclose information about other people to us via the Service, you must obtain the other person’s consent. Please do not send us any information about people under 16 years old. If we become aware that we have collected the information of a person under 16, we will delete it.**

#### *1.2. Information We Collect Automatically*

When you interact with the Service, we collect certain information automatically. This includes:

- Analytics about your interaction with our Service, including traffic data, location data, weblogs and other communication data, the resources and pages that you access, and how you reached our Service.
- Details about the device and network you use to access our Service, including your IP address, operating system, browser type, ISP, and any unique or device identifiers.

#### *1.3. Information We Collect From Other Sources*

NCLD partners with other organizations to give their members access to the Service. If you have access to the Service through your organization, your organization may have given us your contact information to allow us to enroll you in the Service.

#### **1.4. Information Collected From Web Technologies**

We use cookies and other technologies to provide features on our Service. We also partner with other companies that use these technologies to collect information about your use of our Service.

We and our partners use these technologies for the following purposes:

- Service-related: These technologies are necessary to support Service functionality, such as saving your login or account preferences.
- Features: These technologies support features of the Service, such as messaging functions.
- Analytics: These technologies help us to understand how visitors interact with our Service by collecting and reporting information about how you and your device interact with the Service.

Below is a list of the partners who are integrated into the Services with links to more information about their use of your information and any options they may make available regarding tracking.

Category	Partner	Further Information
Features	Facebook	<a href="#">Privacy Policy</a> / <a href="#">Opt-out</a>
Features	Twitter	<a href="#">Privacy Policy</a>
Analytics	Google Analytics	<a href="#">Google Privacy and Terms</a>
Analytics	Amplitude	<a href="#">Amplitude Privacy and Terms</a>

## **2. How We Use Your Information**

We may use the information we collect about you for the following purposes:

- To provide you with the Service, including to enable you to make posts and send communications to other users, share your activity level, send service communications, and conduct general business operations such as accounting, recordkeeping, and audits.
- To support NCLD and its causes, which may involve processing your information. For example, NCLD may aggregate statistics about how many users are active on the Service to support fundraising activities (but NCLD does not disclose your information to donors or for commercial purposes), or send messages to users in the context of a get-out-the-vote initiative.
- To collect community feedback through surveys. We may use aggregated survey information as part of our advocacy.
- To provide users who act as community administrators or leaders with statistics about user engagement in their communities, such as information about how many people engaged with a post.
- To give you recommendations and to enable additional features on our Services and to provide you with a personalized service.
- To provide you with the best service and improve and grow our Service, including to understand how our Service is being used, and develop new products and services.
- To protect and secure our Service, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with legal requirements regarding the provision of products and services.

## **3. How We Secure the Information We Collect From or About You**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Service. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## **4. How We Share Your Information**

### ***4.1. Service Providers***

We engage vendors to perform functions on our behalf, and they may receive information about you. These vendors are obligated by contract to use information that we share only for the purpose of providing these services. The business functions our vendors support include: facilitating surveys, billing and collection; auditing and accounting; professional services; analytics services; security; IT; and marketing emails.

The Service itself is powered by [Tribe Technologies Inc.](#), a cloud platform for online communities.

### ***4.2. Research and Philanthropic Partners***

We may partner with researchers or philanthropic partners who are interested in your opinions, survey responses, or the analytics data we collect when you use the Service. We do not expect to disclose personal information to these partners. If our partners were to request personal information about our users, we would obtain users' consent before disclosing it. We may disclose information that has been de-identified, however, such as statistics about usage patterns on the Service. For example, we might report to a partner that "X number of young adults on LD Connect said they are struggling in school."

### ***4.3. Third-Party Organizations of which You Are a Member***

We may disclose information about your use of the Service to the organization that originally gave us your information so that we could create your account. This information would not identify you personally, e.g., "X number of users have used LD Connect in the last 10 days."

### ***4.4. Partners that Provide Data Analytics***

We integrate third party technologies into the Service to create statistics and other analytics about users' interaction with the Service that enable us to monitor the Service's status and make improvements to it. Those partners are listed in "Information Collected From Web Technologies" above.

### ***4.5. Other Social Media Platforms***

If you choose to interact with us through social media, your interaction with these programs typically allows the social media company to collect some information about you through your interaction with buttons or links to their services. Please visit the social media companies' respective privacy policies to better understand their data collection practices and the controls they make available to you.

### ***4.6. In Response to Legal Process***

We share data when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests.

## **5. Additional Information about Our Data Collection and Sharing Practices**

### ***5.1. Sharing of Aggregated or De-Identified Data***

We may use and share at our discretion data that has been aggregated (information that has been compiled into summaries) or de-identified (information that has been stripped of all unique identifiers such that it cannot be linked to a particular individual).

### ***5.2. Combination of Information***

We may combine information from the Service together and with other information we obtain about you from our business records. For example, we may compare your LD Connect account information to our other databases to determine whether you participate in other NCLD programs.

### ***5.3. Change of Ownership or Organization***

We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this Policy.

### ***5.4. Cross-border Transfer of Data***

If you use our Service outside of the United States, you we may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

## **6. Our Practices Regarding Information Belonging to Children**

The Service is intended for users aged 18-26. NCLD does not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 16, we will delete that information.

## **7. Sharing of Medical or Health Information**

To the extent that we receive protected health information about you, that information is subject to electronic disclosure to the extent permitted by applicable law.

## **8. Your Options and Rights to Manage Your Information**

### ***8.1. Your Account***

Please visit your account page to update your contact information and preferences.

### ***8.2. Email Unsubscribe***

If at any time you would like to unsubscribe from receiving future emails, you can click the unsubscribe link at the bottom of any email newsletter, log in to your account and change your preferences, or email us at [ldconnect@ncl.org](mailto:ldconnect@ncl.org) and we will promptly remove you from all correspondence.

### ***8.3. Web Technologies***

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Service may not be available, work, or work as designed. You may also be able to opt out of or block tracking by interacting directly with the other companies who conduct tracking through our Service – please see the table in “Cookies and Other Tracking Technologies” above.

On mobile devices, please refer to your device or operating system manufacturer’s instructions. General information about privacy on Apple/iOS devices is [here](#), and information about Android settings is [here](#).

### ***8.4. Do Not Track***

Your browser or device may include “Do Not Track” functionality. We do not honor Do Not Track signals at this time.

## **9. Your California Privacy Rights**

Residents of the State of California have the right to request information from NCLD regarding third parties to whom we have disclosed certain categories of information during the preceding year for those third parties' direct marketing purposes. We do not share your personal information with third parties for those third parties' direct marketing purposes.

### **10.Special Information for Nevada Residents**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. We do not sell your information in this manner. If you are a Nevada resident and would like more information about our data sharing practices, please contact us at [ldconnect@nclد.org](mailto:ldconnect@nclد.org).

### **11.Changes to This Policy**

We may make changes to this Policy from time to time. The "Effective Date" at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Policy.

### **12.Contact**

For questions about our privacy practices, contact us at [ldconnect@nclد.org](mailto:ldconnect@nclد.org).