

## 150 Customer Privacy Policy

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Source: Department of Financial Institutions, Privacy of Consumer Financial Information, Better Business Bureau Accreditation

Spokane Neighborhood Action Partners (SNAP) and SNAP Financial Access, hereafter referred to as SNAP, take your privacy seriously and is committed to complying with all laws that apply to us when we provide services to you. This Privacy Policy (the "Policy" or this "Privacy Policy") describes SNAP's policies for the use and disclosure of information about you stored in our files, databases and associated digital mediums.

Please take the time to read and understand this Privacy Policy so you can know how we use your personal information. We use a variety of security technologies, programs, and procedures to help protect your personal information from unauthorized access, use, or disclosure.

SNAP is committed to keeping your privacy. The purpose of our policy is to help you know:

- (i) what types of information we are collecting
- (ii) how we use that information
- (iii) what your options are regarding your data

This Privacy Policy applies to all files, databases and current website(s) and to other websites that SNAP does, or may in the future, own or control. The website(s) may contain links to other websites. SNAP does not endorse and is not responsible for the privacy practices of these linked sites. We encourage you to look for and review the privacy policies of every website you visit.

Although major changes do not happen often, SNAP may revise and update this Policy at any time for any reason. Your continued use of SNAP's website, databases, applications, and their related content and services will mean you accept those changes.

### RICH INTERNET APPLICATIONS

#### *What Information is Collected?*

SNAP operates websites, including [www.snapwa.org](http://www.snapwa.org), and other digital applications. When you use the website(s), you may be able to:

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| <ul style="list-style-type: none"><li>(i) create an account including<ul style="list-style-type: none"><li>a. unique user ID</li><li>b. password</li></ul></li><li>(ii) complete forms</li><li>(iii) provide other information</li><li>(iv) access and/or download further materials</li></ul> | <ul style="list-style-type: none"><li>(v) provide demographic information including<ul style="list-style-type: none"><li>a. your name</li><li>b. address</li><li>c. telephone number</li><li>d. email address</li><li>e. next of kin</li></ul></li></ul> |
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The website(s) is designed and meant for use only by adults. The website(s) is not meant for or designed for use by children under the age of 13. SNAP does not knowingly collect information from anyone under the age of 13.

## COOKIES

SNAP's websites collect the following types of cookies:

Types of Cookies	Description	Managing Settings
Required Cookies	Required cookies are necessary for basic website functionality. Some examples include: authentication cookies, security cookies and session cookies needed to transmit the website.	Required cookies are essential to operate the website and there is no option to opt-out of these cookies.
Functional Cookies	Functional cookies include but are not limited to: cookies used to analyze site traffic, cookies used to improve website function, cookies which collect information on how our website is used including which pages are viewed most often. Additionally, Google analytics uses cookies to help us analyze how our websites are used, including the number of visitors and the pages on our website which visitors navigate.	You can opt out of functional cookies when visiting SNAP's website by clicking on the banner at the top of the screen and selecting "cookie settings" this will allow you to enable or disable functional cookies.

## CLICKSTREAM DATA

As you use the Internet, a trail of electronic information is left at each website you visit. This information is referred to as "clickstream data". Clickstream Data can be collected and stored by a website's server. Clickstream data can tell us the type of computer or device and browsing software you use and the address of the website from which you linked to the website(s).

We may use clickstream data:

- (i) as a form of non-personal information to anonymously determine how much time visitors spend on each page of the website(s)
- (ii) to see how visitors navigate throughout the website(s)
- (iii) to tailor our web pages in the future to better meet the needs of visitors

Any collection or use of clickstream data will be anonymous and combined with other data so your identity and information will not be identifiable.

## SNAP DATABASES AND CLIENT/DONOR FILES

When you access SNAP services, you may complete forms and/or provide demographic information to determine eligibility. Information you provide to this agency may be entered into SNAP's computer systems or maintained in paper files. SNAP keeps a record of the services we provide you. You have the right to a copy of your records. You can request copies of your file information by calling 509-456-7627. Information collected in SNAP's files and databases is used to provide services to clients. That information can include:

- |                             |                                   |
|-----------------------------|-----------------------------------|
| (i) your name               | (viii) assessments                |
| (ii) address                | (ix) housing information          |
| (iii) telephone number      | (x) health information            |
| (iv) email address          | (xi) case notes                   |
| (v) next of kin             | (xii) income information          |
| (vi) social security number | (xiii) other required information |
| (vii) program enrollments   |                                   |

If you receive services from SNAP, we may need to share your protected information with our funders. We will not share your protected information with others or for other reasons unless you direct us to do so, or unless contracts or the law authorizes or compels us. You have certain rights regarding certain of the information we keep about you. These rights include:

- (i) the right to be notified in the event of a breach involving protected personal information
- (ii) the right to opt out of communications for fundraising or general SNAP informational purposes.

If you believe your privacy rights have been violated, you may file a complaint with SNAP. All complaints must be submitted in writing, and all complaints will be investigated without repercussion to you. If you need help in writing your concerns, please contact a SNAP Information Specialist for assistance at 509.456.7627.

Any requests need to be in writing and submitted to SNAP's Chief Privacy Officer. To do so, please contact the SNAP Privacy Officer at 509.456.7627x5313, or 3102 W. Whistalks Way, Spokane, WA 99224.

Donors who supply SNAP with their telephone number may occasionally be contacted by telephone regarding donations they have made or campaigns that are occurring. We also utilize mobile technology to send out occasional text messages and opportunities; unsubscribe options are always included in these messages.

Donors who supply SNAP with their postal address or email address may be contacted periodically for solicitation purposes and/or with information regarding upcoming events. Donors may request to be permanently removed from SNAP mailing lists by contacting us via email at [fundraising@snapwa.org](mailto:fundraising@snapwa.org), phone at 509-456-7627, or postal mail at 3102 W. Whistalks Way, Spokane, WA 99224.

### THIRD-PARTY SERVICE PROVIDERS

SNAP has third-party service providers that may have access to your protected information in the course of providing products or services to SNAP. This access to protected information is provided in keeping with a contract with us requiring similar safeguards as those defined in this Privacy Policy.

These contractors like but not limited to vendors and suppliers that provide us with:

- (i) technology
- (ii) services (such as website hosting)
- (iii) data analysis
- (iv) research and/or
- (v) content related to the use and upkeep of the website(s).

Access to your protected information by these contractors is limited to the information reasonably necessary for the contractor to perform its function for SNAP.

SNAP will also require that our operations and maintenance contractors:

- (i) protect the privacy of your information
- (ii) not use or disclose Personal Information for any purpose other than providing SNAP with products and services

Once your information leaves our control, it is governed by the privacy policies and laws that apply to that entity.

### HOW SNAP HANDLES PRIVACY AND SECURITY

SNAP and its contractors use a number of physical, administrative, and technical security measures. These measures are meant to protect against loss, unauthorized access, use or disclosure, and changing of the information under our control. The website(s) and database servers are hosted in a secured physical and network environment maintained by SNAP or a third-party hosting provider.

Reasonable efforts are made to secure web servers, networks, hosting operating systems and databases against unauthorized access. We use a number of security measures to protect your information when stored or transmitted by SNAP. This includes regular backup, automatic logoff, role-based access, and Secure Socket Layer (SSL) Encryption. In order to take advantage of encryption, you must have an Internet browser that supports 128-bit Encryption.

Despite SNAP's efforts to protect your information, there is always a risk that an unauthorized third party may find a way around our security systems. It is also possible that transmissions of your information over the Internet will be intercepted. Please remember that no security measures are foolproof. SNAP cannot guarantee that information will be protected in all situations.

## COMPLIANCE WITH APPLICABLE LAW

SNAP is located in the United States. We will collect, store, and process your information that we obtain from the use of the website(s) and our software applications in the United States. These activities shall be governed by applicable United States laws and regulations and this Privacy Policy. The information may be available to the United States government or its agencies under legal process made in the United States.

We may transfer your information outside the United States to our service providers with operations in other countries. By using the website(s), you consent to such collection, storage, and processing in the United States and elsewhere, though data protection levels vary by country.

We will take reasonable steps to protect your information in accordance with applicable law in the United States.

## HOW TO CONTACT US

If you have any questions about our privacy practice, contact us by email at [communications@snapwa.org](mailto:communications@snapwa.org), by phone at 509.456.7627, or by mail at 3102 W. Whistalks Way , Spokane, WA 99224.