

Privacy policy

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The Commonwealth Kind website and service including (without limitation) all websites, mobile applications and other interactive properties through which the service is delivered (collectively, the "Service") are owned, operated and distributed by RoadmapMetrics, Inc., a Massachusetts corporation (referred to in these Privacy Policy as "RoadmapMetrics" or "Commonwealth Kind" or "we" and through similar words such as "us," "our," etc.). When we collect your information we may share it across our group companies.

This Privacy Policy explains how Commonwealth Kind uses personal information we collect and how you can limit our use of that personal data.

When you visit our website www.CommonwealthKind.org, and Facebook application, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites or Apps and our services. This privacy policy applies to all information collected through our website (such as www.CommonwealthKind.org), Facebook application, ("Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us such as name and email address.

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or Apps or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services or Apps, the choices you make and the products and features you use. The personal information we collect can include the following:

Personal Information Provided by You. We collect name, email address, and facebook friends; and other similar data.

Facebook Social Media Login Data. We provide you with the option to register using Facebook account details. If you choose to register, we will collect the Information described in the section called "[HOW DO WE HANDLE YOUR FACEBOOK LOGINS](#)" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

***In Short:** Some information — such as IP address and/or browser and device characteristics — is collected automatically when you visit our Services or Apps.*

We automatically collect certain information when you visit, use or navigate the Services or Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Services or Apps, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

Online Identifiers. We collect devices; tools and protocols, such as IP (Internet Protocol) addresses; cookie identifiers, or others such as the ones used for analytics and marketing; and other similar data.

Information collected through our Web Application

***In Short:** We may collect information regarding Facebook permissions when you use our web application.*

We may also collect the following information:

- *Facebook Permissions.* We by default access your Facebook basic account information, including your name, email, facebook friends, and profile picture URL. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

2. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Services or Apps, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** We use the information you allowed us to collect from your Facebook Account to facilitate account creation and logon process for the performance of the contract. See the section below headed "HOW DO WE HANDLE YOUR FACEBOOK LOGINS" for further information.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, and to evaluate and improve our Services or Apps. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies to facilitate and maintain user login ONLY.

5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: When you register with our web application using your Facebook Account, we may have access to certain information about you.

Our Services or Apps offer you the ability to register and login using your Facebook Account. Where you choose to do this, we will receive your name, email address, profile picture, and friends list. We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Services or Apps. Please note that we do not control, and are not responsible for, other uses of your personal information by Facebook. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services or Apps is at your own risk. You should only access the services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of

age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services or Apps, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services or Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at admin@CommonwealthKind.org.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services or Apps. To opt-out of interest-based advertising by advertisers on our Services or Apps visit <http://www.aboutads.info/choices/>.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you

are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below. If you are under 18 years of age, reside in California, and have a registered account with the Services or Apps, you have the right to request removal of unwanted data that you publicly post on the Services or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services or Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

12. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at info@CommonwealthKind.org or by post to:
RoadmapMetrics, Inc.
37 Washington St. Suite 211
Melrose, MA 02176
United States

HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by email at admin@CommonwealthKind.org. We will respond to your request within 30 days.