

Data Protection and Privacy Policy

Overview

This document is The Job Foundation's Data Protection and Privacy Policy for the organization. These policies are a set of rules and guidelines required by all employees and data handlers to follow whenever working with The Job Foundation's data and systems.

1. 8 Principles of Data Protection

- a. The following points are a list of guidelines that all Job Foundation data users will strive to achieve while working with the data within the organization.
 - i. Fairly and lawfully processed
 - ii. Processed for limited purposes
 - iii. Adequate, relevant, and not excessive
 - iv. Accurate and up to date
 - v. Not kept for longer than is necessary
 - vi. Processed in line with individuals' rights
 - vii. Be protected in appropriate ways
 - viii. Not transferred to other countries without adequate protection

2. Information We Collect

- i. Website collection
 - 1. Volunteer Form
 - 2. Donation page
 - 3. Website traffic
- ii. Enrollment and Re-Enrollment collection
 - 1. Student Information
 - a. Full Name
 - b. Address
 - c. Phone Number
 - d. Social Security Number
 - e. Email
 - f. Birth Dates
 - 2. Family/Guardian Information
 - a. Full Name
 - b. Address
 - c. Phone Number
 - d. Email
 - e. Birth Dates
 - 3. Student Academic Information

- 4. Student Medical Information
- 5. Student/Family Socio-Economic Information
- 6. Student Banking Information

iii. Employee collection

- 1. Employee Information
 - a. Full Name
 - b. Address
 - c. Phone Number
 - d. Email
 - e. Social Security Number
 - f. Driver's License
 - g. Car Insurance
 - h. Banking Information
 - i. Birth Dates

iv. Volunteer collection

- 1. Volunteer Information
 - a. Full Name
 - b. Address
 - c. Phone Number
 - d. Email
 - e. Birth Dates

3. Disclosure of Your Information

a. The Job Foundation may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection.

4. Controlling the Use of Your Data

a. If you have given us consent to use your data for a particular purpose, you can revoke or vary that consent at any time. If you do not want us to use your data or want to vary the consent that you have provided, you can write to us at the address: 4600 University Avenue Suite #1, Cedar Falls, IA 50613, or email us at info@thejobfoundation.org

5. Where We Store and Transfer Your Data

- a. Data and information The Job Foundation has collected may be transferred to and stored in countries outside of the United States. Our website for the Volunteer Form, and the site for the Donation form use remote website server hosts that may be located outside of the United States. Our Student/Family enrollment information is hosted through the Microsoft Azure "Cloud" service that may be located outside of the United States.
- b. The Job Foundation will process, disclose, or share your personal data only if required to so by law, or in the good faith belief that such action is necessary to comply with legal processes served on us or the website.
- c. You have the right to opt out of our processing your personal data for marketing purposes by contacting us at info@thejobfoundation.org

6. **Security**

a. The transmission of information via the Internet or email is not completely secure. Although, The Job Foundation will do its best to protect your personal data, we cannot guarantee the security of data while you are transmitting it through our site. Any such transmission is at your own risk. Once we have received your personal data, The Job Foundation will use strict procedures and security features to try to prevent unauthorized access.

7. Third Party Links

a. Any URLs to third part websites located on our website, or any outputs The Job Foundation may provide, should have their own Data Privacy Policies in place. We would encourage you to check these policies if available. The Job Foundation does not accept responsibility or liability for their policies, as we do not have any control over them.

8. Use of Cookies

a. Our website does not currently track any cookie information from its users.

9. Your Rights

- i. Although The Job Foundation is not an organization being directly funded from the U.S. Department of Education, we have chosen to follow the guidelines set forth by The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99).
- ii. ¹FERPA gives parents/guardians certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18. Students to whom the rights have transferred are "eligible students."
 - Parents or eligible students have the right to inspect and review the student's education records maintained by The Job Foundation. The Job Foundation is not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records
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 - 3. Generally, The Job Foundation must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without

¹ Family Educational Rights and Privacy Act (FERPA)

consent, to the following parties or under the following conditions (34 CFR § 99.31):

- a. School officials with legitimate educational interest.
- b. Other schools to which a student is transferring.
- c. Specified officials for audit or evaluation purposes.
- d. Appropriate parties in connection with financial aid to a student.
- e. Organizations conducting certain studies for or on behalf of the school.
- f. Accrediting organizations.
- g. To comply with a judicial order or lawfully issued subpoena.
- h. Appropriate officials in cases of health and safety emergencies.
- i. State and local authorities, within a juvenile justice system, pursuant to specific State law.

10. Changes to this Policy

a. The Job Foundation may update these policies to reflect changes to the website and any internal data system or process changes. Please regularly review these polices to be informed of how we are protecting your personal data.

Any questions can be directed to The Job Foundation at 4600 University Avenue Suite #1, Cedar Falls, IA 50613, or by email to info@thejobfoundation.org.

Policy Completed By	Cade Demro
Date of Completion	01/09/2023
Board Members Approval Date	02/14/2023
Reviewed or Amended Date	