

**NAPA INSTITUTE LEGAL FOUNDATION,
a California Nonprofit Religious Corporation**

PRIVACY & COOKIES POLICY

(Adopted on 12/11/2019)

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Introduction

This is the Privacy & Cookies Policy (the “**Policy**”) of Napa Institute Legal Foundation, doing business as Napa Legal Institute (“**NLI**”), a nonprofit corporation organized under the California Nonprofit Religious Corporation Law (Cal. Corp. Code §§9110 *et seq.*) exclusively for religious purposes. For federal tax purposes, the Corporation is a 501(c)(3) tax-exempt public charity.

By using the NLI website, mobile applications, and other online properties (each, a “**Site**” and collectively, the “**Sites**”), you agree to the terms of this Policy and any future versions of the Policy implemented during your time as a user of the Sites. If you do not agree with this Policy, please do not use the Sites.

This Policy describes how NLI collects, uses, shares, and otherwise processes Personal Data (as defined below) from its Sites about:

- Visitors to the Sites
- Contact persons for visitors, donors, volunteers, program participants, suppliers of goods or services to NLI, or any other individuals or organizations about whom NLI obtains Personal Data

In this Policy, “**Personal Data**” means information that (either in isolation or in combination with other information held by NLI) enables you to be identified as an individual or recognized directly or indirectly.

Our Responsibilities

Unless we specifically state otherwise, NLI is the data controller of the Personal Data we process; therefore, NLI is responsible for ensuring that our use of Personal Data complies with applicable law.

NLI staff and volunteers are required to comply with this Policy and any associated NLI policies when dealing with Personal Data.

Where NLI receives Personal Data from affiliated organizations or individuals, the organization or individual transferring the Personal Data to NLI is responsible for ensuring that the transfer complies with applicable law.

Key Points

What is Personal Data?	As mentioned above, in this Policy, “ Personal Data ” is information that alone or when combined with other information held by NLI enables you to be identified as an individual or recognized directly or indirectly. The specific categories of Personal Data that NLI collects in order to achieve its mission are described on pages 2-3.
What We Collect and Why	NLI collects Personal Data because this information helps us fulfill our religious purpose and provide our religious and educational resources.
Children’s Personal Data	NLI’s website is not directed to users under age eighteen, and children under age thirteen are not authorized to provide NLI with Personal Data. If you become aware that a child has provided NLI with Personal Data, please contact NLI at info@napalegalinstitute.org .
How We Use Personal Data	NLI uses Personal Data primarily for communications related to our religious mission and for compliance with our responsibilities under applicable law and regulations. Examples of these mission-related communications include, but are not limited to, activities such as: <ul style="list-style-type: none">• Delivering NLI’s educational and religious documents, courses, and related materials, responding to inquiries,• Working with donors, volunteers, and other external partners, and• Providing relevant marketing and publicity.
Sharing Personal Data	NLI shares Personal Data to help us achieve our religious mission through activities similar to those listed above. For example, we use Personal Data to provide relevant cross-marketing and publicity with affiliated organizations such as The Napa Institute, when doing so would help to advance our mission. NLI does not disclose Personal Data to third parties for compensation. From time to time, NLI may share Personal Data with a third party for the limited purpose of assisting NLI in analyzing the Personal Data to improve the way NLI carries out its religious mission.
Marketing and Publicity	You control how NLI uses Personal Data for marketing. You can opt out at any time by contacting us at info@napalegalinstitute.org .

<p>How We Collect Personal Data</p>	<p>NLI collects Personal Data when you ask us to, typically by joining our mailing list or requesting NLI educational materials.</p> <p>The NLI website also collects Personal Data automatically by using cookies. The term “cookies” refers to a packet of information which a computer receives and returns to a website to help the website keep track of its users and uses. Cookies help NLI understand how people use the information we provide online. NLI offers you choices on how we use cookies, including third party targeting and advertising. You can also opt out of the use of cookies from your browser or mobile device. You can learn more about cookies here: https://us.norton.com/internetsecurity-how-to-what-are-cookies.html.</p>
<p>Your Rights</p>	<p>You have certain rights to access, rectification, deletion, objection, or other actions regarding your Personal Data where required by applicable law. You can read about these rights online. One helpful resource is available here: http://www.ncsl.org/research/telecommunications-and-information-technology/state-laws-related-to-internet-privacy.aspx.</p>
<p>Data Security</p>	<p>NLI uses third party services to maintain technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction.</p>
<p>Do Not Track Signals</p>	<p>Some browsers allow users to send a “do not track” request to websites to request that Personal Data is not collected by third parties. NLI does not currently have the technical functionality to accept “do not track” requests, and, instead, requires that users consent to the activities described in this policy.</p>
<p>The Legal Bases for NLI’s Uses of Personal Data</p>	<p>NLI’s planned use of Personal Data is based on your agreement as a user of the Sites. NLI may also use Personal Data to carry out its contracts with users, to comply with legal obligations, and to further the legitimate interests of NLI without infringing on legally recognized rights of users.</p>
<p>Credit Card Information</p>	<p>Credit card information is not collected or stored on NLI servers. Donations and the related payment card information is entered directly into a third-party processor’s systems and is not transmitted through or stored by NLI. The card processor provides NLI with an authorization code which is securely stored with the payment record on our servers.</p>
<p>Cross-Border Transfers</p>	<p>NLI does not intentionally collect Personal Data from any jurisdiction except the United States. If cross-border transfers of Personal Data occur in the future, we will provide appropriate protections where required by applicable law.</p>
<p>How You Can Opt Out</p>	<p>If you would like to opt out of communications with NLI, you may unsubscribe by contacting info@napalegalinstitute.org.</p>
<p>If You Have Questions</p>	<p>If you have questions, please contact us at info@napalegalinstitute.org or write to us at: Napa Legal Institute 1730 M St NW Suite 910 Washington, DC 20036.</p>

State law statements about privacy	Some states have specific laws which address how Personal Data can be used. To see the state-specific disclosures, please go to page 5.
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In Depth

Collection of Personal Data

NLI collects Personal Data from a number of sources, either directly from the data subjects, or from affiliated organizations such as The Napa Institute, colleagues, donors, and publicly available sources.

NLI collects the following categories of Personal Data about the Sites' visitors, donors, potential donors, volunteers, potential volunteers, suppliers, and other third parties:

1. **Basic data:** Name, sex, religious affiliation, title, organization, job responsibilities, phone number, mailing address, email address, contact details, and information about family life (excluding special categories of Personal Data), including family, children, hobbies, and interests.
2. **Special categories of data:** In limited circumstances, we may use information you have provided that relates to your status as a donor, volunteer, service provider, or program participant, such as racial or ethnic origin, health data, or membership in other organizations.
3. **Registration data:** Newsletter requests, event/seminar registrations, dietary preferences (excluding special categories of data), subscriptions, downloads, and username/passwords.
4. **Donor/Program participant data:** Personal Data received from donors or program participants in respect of employees, customers, legal or tax advisors, bankers, board members and officers, or other individuals known to donors or program participants, any invoicing details and donation or payment history, and feedback.
5. **Marketing data:** Data about individual participation in conferences and in-person seminars, credentials, associations, product interests, and preferences.
6. **Compliance data:** Government identifiers, dates of birth, beneficial ownership data, and due diligence data.
7. **Job application data:** Data provided by job applicants or others on our Sites or through offline means in connection with employment opportunities.
8. **Device data:** Computer Internet Protocol (IP) address, unique device identifier (UDID), cookies and other data linked to a device, and data about usage of our Sites (Usage Data).

Use of Personal Data

NLI uses Personal Data for the following purposes:

- To identify and communicate with organizations and individuals who may be interested in participating in our programs or utilizing our publications and other religious and educational materials;
- To manage our religious programs and operations and administer our relationships with volunteers, donors, and program participants, and service providers;
- To make the religious and educational content on our Sites more user friendly;
- To protect the security and effective functioning of the Sites and information technology (IT) systems, which are the platform for sharing our religious and educational materials and program information; and
- To provide relevant marketing, so that people in need are aware of the religious and educational resources we offer.

Children's Use of the NLI Website

NLI's website is not directed to users under age eighteen, and children under age thirteen are not authorized to provide NLI with Personal Data.

State Privacy Disclosures

We do not knowingly allow other parties to collect personally identifiable information about your online activities over time and across third-party web sites when you use the Sites. We provide information about the opt-out or opt-in choices available to users.

Applicable California privacy legislation permits visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To request access to such information, please email info@napalegalinstitute.org. Within thirty (30) days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year.

We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

Prior Versions

Current Version: Adopted on 12/11/2019

Prior Versions: (not applicable)