

# INTERNATIONAL REGISTRATION PLAN, INC.

## Privacy Policy

This Privacy Policy explains how International Registration Plan, Inc. (IRP) collects, uses, shares and safeguards Personal Data and Non-Personal Data on [www.irponline.org](http://www.irponline.org) and any other digital services and platforms officially operated or used by IRP (collectively, "Sites"), as well as by telephone or by paper.

### Changes to the Privacy Policy

As technology evolves and the needs of IRP and its member jurisdictions change from time to time changes in this Privacy Policy may be required. IRP reserves the right to amend the Privacy Policy at any time, for any reason.

### Types of Data IRP Collects

#### Personal Data

IRP collects information (whether online, by phone, or by paper) that enables IRP to identify or contact you (Personal Data) to carry out its mission. IRP Sites collect this information for a variety of reasons, including registration for IRP events and programs or otherwise interacting with IRP.

The types of Personal Data we collect includes data such as:

- General data (e.g., names, dates of birth, home and business addresses, email addresses, Internet addresses and mobile/landline business/personal telephone numbers that are provided by representatives of member jurisdictions, members of the community served by IRP and other interested persons)
- Government-issued identification numbers, for example from employees, independent contractors, and vendors (but not from representatives of member jurisdictions unless IRP makes payments to those persons)
- Other identification information (e.g., photographs)
- Financial information (e.g., credit and debit card numbers, credit reports, passwords and PIN numbers) for product sales or employment purposes

#### Non-Personal Data

IRP collects information (whether online, by phone, or by paper) that does not directly identify you as you interact with our Sites (Non-Personal Data). The types of Non-Personal Data we collect includes data such as:

- Site usage (e.g., browsing history, search terms, number of clicks, referring/exit pages, date/time stamp, time on Site)
- Information resources viewed on Sites
- Computer type, operating system and platform type
- Internet service provider

## **How We Use Your Data**

In addition to the uses described above, we use your Personal Data, sometimes combined with Non-Personal Data, in a variety of ways, for purposes such as the following:

### Personal Data

- Identify you when you visit our Sites
- Provide service communications such as order confirmations, program registrations and member service messages
- Provide information and services you request or that we think you may be interested in
- Respond to your emails or online requests for services, or information
- Deliver and process surveys
- Personalize and improve the usability of the Sites
- Fulfill and/or deliver IRP services
- Tailor content to your needs or interests
- Publish membership directories, membership lists and registration lists on the Sites and in print and digital media to allow members of the IRP community communicate with you; such directories and lists will not include credit card information or personal identification numbers such as social security numbers

### Non-Personal Data

We use Non-Personal Data to improve the functionality of our Sites and for other reasons. We do not provide Personal Data to third parties with whom we share your Non-Personal Data. Please note that, when you select a link that takes you to sites not operated by IRP, you may be subject to the privacy policies of these third-party sites.

## **How We Share Your Data**

We share your Personal Data, sometimes combined with Non-Personal Data, in a variety of ways such as:

- Share data with third parties to fulfill service requests and to perform functions (e.g., IRP contracts with third parties to provide services on our behalf such as data hosting services; and consulting services; and event registration services)
- Share data with third parties as required by law or to protect IRP to: (a) conform to legal requirements or comply with legal process served on IRP; (b) protect and defend IRP's rights or property; or (c) protect the personal safety of IRP personnel or members of the public in appropriate circumstances
- Share your email address, but only as permitted by the IRP email policy, as follows: Your email address will be used only by IRP and IRP vendors performing member services. IRP does not sell or rent email addresses to anyone outside IRP, nor does IRP share email addresses to unrelated third-parties, affiliates. Please understand, however, that your email address may be visible to others who have interest in the activities of IRP, as well as the public through IRP's membership directory, membership lists and registration lists. IRP also shares your email address with third parties to enable IRP to take security measures to help protect against unauthorized access to or

unauthorized alteration, disclosure, or destruction of data. Finally, IRP shares email addresses with third parties as necessary for IRP to perform certain services on our behalf, such as processing event registrations.

### **How You Can Manage the Processing of Your Data**

You can manage your profile and email preferences by contacting us using the information in the “Contact Information” section below. Our processing of your data is based upon your consent, member status, or compliance with law. You have the right to withdraw your consent at any time.

### **How We Protect Personal Data**

IRP implements commercially reasonable security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. Except for membership directories, membership lists and registration lists, and the sharing of information as set forth in this Privacy Policy, we restrict access to Personal Data to certain companies who need the data to operate, develop, or improve our services. These individuals or partner organizations are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Unfortunately, no data transmission over the Internet or electronic storage is fully secure. Accordingly, and despite our reasonable efforts to protect your Personal Data from unauthorized access, use, or disclosure, IRP cannot guarantee or warrant the security of the Personal Data you transmit to us, or to or from our online Sites. If you have questions about this Privacy Policy, please contact us.

### **User ID and Password**

Certain areas of the Sites require the use of a user ID, email address, or password as an additional security measure that helps protect your Personal Data. To help you protect your privacy, these Sites have tools to help you log in and log out.

### **Linking to Other Internet Sites**

You should be aware that other Internet sites that are linked from the Sites or from an IRP email message may contain privacy provisions that differ from the provisions of this Privacy Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of these other linked sites, applications, or other digital platforms.

### **How You Can Update Your Personal Data**

We rely on you to update and correct your Personal Data. If you are a user of our Sites, a representative of a member jurisdiction, an associate member of IRP or a member of the community served by IRP, you can update and correct your information by contacting us using the information in the “Contact Information” section below.

### **Cookies, Other Web Devices and Do Not Track Signals**

Our website sends cookies (e.g., computer code or text placed on your computer by us or third-parties when you browse our Sites) to your web browser (if your browser’s preferences allow it) to collect data when you browse our Sites. Cookie settings can be controlled in your Internet browser to automatically reject some forms of cookies. If you view our website without changing your cookie settings, you are indicating your consent to receive all cookies from our Sites. If you do not allow cookies, some features and functionality of our Sites may not operate as expected. In addition to cookies, we place technological tools (and allow certain third parties to place technological tools) such as tags and beacons (e.g., code scripts that are primarily used to track visitors’ activities on our Sites by web analytics

software), Internet Protocol (IP) addresses, and other tools, to collect your data for the purposes listed in this Privacy Policy.

### **Do Not Track Signals**

We do not respond to web browser “do not track” signals. As such, your navigation of our Site may be tracked as part of the gathering of quantitative user information described above. If you arrive at our Site by way of a link from a third-party site that does respond to “do not track” requests, the recognition of any “do not track” request you have initiated will end as soon as you reach our Site.

### **Transmission of Data to Other Countries**

Your Personal Data is processed in the United States, where privacy laws may be less stringent than the laws in your country and where the government, courts, or law enforcement may be able to access your data. By submitting your Personal Data to us, you agree to the transfer, storage and processing of your Personal Data in accordance with applicable law in the United States.

### **Breach Notification**

In the event we determine the occurrence of a data security incident, we will notify you by email, US mail, telephone, or other means in accordance with applicable legal requirements.

### **Contact Information**

If you have questions, comments, or complaints concerning our privacy practices please contact us using the following information: US mail: International Registration Plan, Inc., 4196 Merchant Plaza #225, Lake Ridge, VA 22192; or by email: [irpmail@irpinc.org](mailto:irpmail@irpinc.org).

Effective Date: October 3, 2018