

## Housing Initiatives of Princeton Charitable Trust



### Privacy Policy

*Updated January, 2024*

Thank you for your interest in Housing Initiatives of Princeton Charitable Trust (“**HIPCT**”) and our website located at <https://www.housinginitiativesofprinceton.org/> (the “**Site**”) and our associated services assisting local individuals and families experiencing housing insecurity to build toward a sustainable future via stable housing, better employment, and a network of support services (the “**Charitable Service**”). Your use of the Charitable Service, through the Site or otherwise, is subject to this Privacy Policy. The Charitable Service and Site are collectively referred to in this Privacy Policy as the “**Service**”. We are pleased to provide this Privacy Policy to inform you of our practices with respect to how we collect and use personally identifiable information in connection with your use of the Service.

### Information We Collect

The data that we may regularly collect about visitors to the Site (e.g., IP address, browser type, pages accessed, duration of visit, pages visited, clicks, etc.) may not necessarily enable us to personally identify you.

We do collect personally identifiable information about you, such as your name and phone number, when you voluntarily provide it by registering with us or using the Service. To facilitate your use of the Service, we may automatically collect certain types of information when you access or use the Service. In order to collect this data, we may utilize automated tools and files such as “cookies” and may share that information with third parties through the use of pixels and analytics tools. Such cookies and tools include user navigation and interaction tracking as well as security mechanisms. These automated tools and files may reside on our servers or on your computer or device. If you restrict our ability to use automated tools and files, your ability to access and use all or part of the Site may be limited or disabled completely. If you have questions about our use of these automated tools please contact us at [info@housinginitiativesofprinceton.org](mailto:info@housinginitiativesofprinceton.org)

We also collect statistical data and other, including personal, information regarding your use of the Service. We also may collect the following categories of personal information commonly enumerated in privacy laws: Identifiers, including name, alias, postal address, social security number, income, debts, assets, medical information, email address, phone number, account name, IP address, geolocation information other similar identifiers and demographic information, including your age and gender.

We may collect information on your use of the Site by monitoring your utilization. This

information – which does not include personal data you intentionally share with us (such as the data enumerated in the paragraph above) – is not shared with parties outside HIPCT unless such sharing is required by applicable laws or regulations.

## **Use of Information**

We use your personally identifiable information primarily to provide you with the Service, to assess how users are utilizing the Service, to monitor uses of the Site for quality assurance and quality control and to provide content on the Service that may be of interest to you. The information is also used to verify your authority to access the Service, to contact you when reasonably necessary, and for the purpose of improving the Service. We may also monitor your interactions with our Site for marketing purposes and to assess the performance of the Site in order to determine whether updates or other modifications are necessary.

## **Share Your Concerns**

HIPCT is committed to lawful and ethical behavior in all our activities. We expect our stakeholders to conduct themselves in compliance with all applicable laws and regulations and with the highest integrity. If you are aware of any improprieties or have any concerns, please report them on the following email: [info@housinginitiativesofprinceton.org](mailto:info@housinginitiativesofprinceton.org).

Effort will be made to investigate a report as discreetly as reasonably possible and to protect confidentiality as reasonably feasible under the circumstances.

## **Controlling Your Personal Information**

We may make available to users messaging and other interactive features. You should be aware that when you voluntarily disclose personally identifiable information (e.g. user name, e-mail address) to third parties via the Service, that information, along with any substantive information disclosed in your communication, can be collected, correlated and used by third parties. Such activities are beyond the control of HIPCT.

## **Disclosure: Parties With Whom We May Share Your Information**

We may disclose your personal information to our employees, contractors, volunteers, board of directors and other stakeholders as needed to provide you with the Charitable Service. These HIPCT individuals may include your Social Worker, the Executive Director, your Liaison and the Family Services Committee.

We may disclose some or all of the personal information that we collect to partner organizations providing support services (related to the Charitable Service) to you or to secure grants which make the Charitable Service possible. We may also share information regarding your visits to our Site with analytics providers. We may additionally share your personal information social media platforms, but with your consent. For this reason, you should not disclose information to us that you do not want shared with third parties. In addition to the foregoing, we will disclose your personally identifiable information as we believe is reasonably necessary to comply with law, regulation or other governmental authority or to prevent harm to yourself or others. We may also contract with various third parties who help us provide and maintain the Service. For example, we use a third party to host the Site, the Service and associated databases, and may subcontract out production, fulfillment, or other operations. In these cases, we will use commercially reasonable efforts to prevent such third parties from disclosing your personal information, except for the purpose of providing the services in question. Finally, we may disclose your personally identifiable information upon a transfer or sale to another entity of all or substantially all of HIPCT's stock or assets related to the Service, or upon any bankruptcy or other corporate reorganization.

## **Security**

Our Service uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar. In addition, we will maintain any personally identifiable information you upload or otherwise provide to us to commercially appropriate standards of security, but no on-line platform or service is free from cybersecurity risks. If you do not wish your personally identifiable information to be at any risk then you should not use the Service or provide personally identifiable information to the Service.

## **Links**

For your convenience, we may provide links to certain third party websites or referrals to certain third parties' products or services. We are not responsible for the privacy or security of information you may share with these third-party websites or providers. If you choose to visit a third party's website or use its products or services, please be aware that the third party's privacy policy, and not the HIPCT privacy policy, will govern your activities and any information you disclose while interacting with the third party.

## **Collection of Information From Children**

We comply with the Children's Online Privacy Protection Act (COPPA), which requires the consent of a parent or guardian for the collection of personally identifiable information from children under 13 years of age. We limit our collection of personally identifiable information relating to children to information reasonably necessary for our provision of the Charitable Service (such as names, ages, number of children in an applicant family, enrichment activities of interest, medical information relevant to providing the Charitable Service, and schools attended and of interest). In the event that we learn that we have collected personally identifiable information from anyone under 13 years of age without prior parental consent, we will take steps to promptly delete such information. We do not disclose this information without parental consent.

## **Notification**

If an electronic or physical security incident is suspected to have resulted in the loss of third-party/customer data, HIPCT will notify affected individuals and government agencies as required by applicable law. If required per applicable law, as soon as practicable and as conditions and the incident diagnosis permit, the company may post preliminary details about the incident on their public system status page. HIPCT may pro-actively notify customers via email or other means.

## **No Error - Free Performance**

HIPCT does not guarantee error-free performance of the Service or our privacy controls as set out in this Privacy Policy. We may not always catch an unintended privacy issue, despite our efforts to do so. Accordingly, we welcome your feedback regarding any privacy concerns that you may have, including how we can improve this Privacy Policy. We will use reasonable efforts to assess the issue and will take reasonably prompt corrective action when we learn of any failure to comply with this Privacy Policy.

## **Disclosures for California Residents**

The Service is not intended for California residents or to be under the aegis of the California Consumer Privacy Act of 2018 ("CCPA").

## **Right to Know and Delete**

You may ask us to delete the personal information we have collected from you or ask us to

inform you of the specific pieces of personal information we have collected about you by emailing us at [info@housinginitiativesofprinceton.org](mailto:info@housinginitiativesofprinceton.org). We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete. We also may deny your requests to the extent we are obligated to maintain certain personal information per applicable law.

### **Right to Opt-Out.**

You have the right to opt-out of receipt of communications from us. You also have the opportunity to “opt-out” of sharing your nonpublic personal information to funding organizations or partner organizations providing support services. You may submit a request to opt-out by emailing us at [info@housinginitiativesofprinceton.org](mailto:info@housinginitiativesofprinceton.org). We also may deny your requests to the extent we are obligated to communicate per applicable law.

### **Policy Changes**

HIPCT reserves the right to change this Privacy Policy, and will post any revisions on the Site. We encourage you to review this policy regularly for any changes. Your continued use of the Service will be subject to the then-current Privacy Policy.

### **Questions**

If you have any questions about our privacy practices, please feel free to contact us at:

Housing Initiatives of Princeton  
33 Mercer Street  
Princeton, NJ 08540  
[info@housinginitiativesofprinceton.org](mailto:info@housinginitiativesofprinceton.org)