1. Policy Statement

Impact Austin is committed to protecting the privacy and confidentiality of Personal Information about its members, employees, community partners, grant applicants, affiliated groups and other identifiable individuals. Impact Austin’s policies, guidelines and actions support this commitment to protecting Personal Information. Each member and employee bears a personal responsibility for complying with this Policy in the fulfillment of their responsibilities at Impact Austin.

2. Scope

This Policy sets the minimum standard and shall guide all Impact Austin employees and Agents even if local law is less restrictive. Supplemental policies and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental policies and practices may provide for more strict or specific privacy and protection standards than are set forth in this Policy.

3. Policy Details

3.1 Impact Austin respects the privacy of its employees and third parties such as members, community partners, grant applicants, affiliated groups, vendors, service providers, suppliers, former employees and candidates for employment and recognizes the need for appropriate protection and management of Personal Information. Impact Austin is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

3.2 Notice. When collecting Personal Information directly from individuals, Impact Austin strives to provide clear and appropriate notice about the:

- Purposes for which it collects and uses their Personal Information,
- Types of non-Agent third parties to which Impact Austin may disclose that information, and
- Choices and means, if any, Impact Austin offers individuals for limiting the use and disclosure of their Personal Information.

3.3 Choice. Generally, Impact Austin offers individuals a choice regarding how we Process Personal Information, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required when Processing Personal Information for:

- Purposes consistent with the purpose for which it was originally collected or subsequently authorized by the individual,
- Purposes necessary to carry out a transaction relationship,
- Purposes necessary to comply with legal requirements, or
- Disclosure to an Agent.

3.4 Accountability for Onward Transfer. In regard to the transfer of Personal Information to either an Agent or Controller, Impact Austin strives to take reasonable and appropriate steps to:
• Transfer such Personal Information only for specified purposes and limit the Agent or Controller’s use of that information for those specified purposes,
• Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Policy,
• Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Policy,
• Require the Agent or Controller to notify Impact Austin if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and
• Upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.

3.5 Security. Impact Austin takes reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the Processing and the nature of the Personal Information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Web page. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

3.6 Data Integrity and Purpose Limitation. Impact Austin will only Process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. Impact Austin shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use.

3.7 Access. Impact Austin provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been Processed in violation of the Impact Austin data privacy principles.

3.8 Recourse, Enforcement and Liability. Violation of this Policy by an employee or contractor of Impact Austin will result in appropriate discipline up to and including termination. Violation by an Agent, Controller or other third party of this Policy or Impact Austin’s privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

4. Purpose of Collecting and Use of Personal Information

Impact Austin may from time to time Process certain Personal Information from or about employees and third parties such as members, community partners, grant applicants, affiliated groups, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic data.

Impact Austin will use that Personal Information to provide members, community partners, grant applicants, affiliated groups, vendors, service partners and suppliers with information and services and to help Impact Austin personnel better understand the needs and interests of these members, community partners, vendors, service partners and suppliers. Specifically, Impact Austin uses information to help complete a transaction or order, to facilitate communication, to market and sell services, to deliver products/services, to bill for purchased products/services, and to provide ongoing service and support.
Occasionally Impact Austin personnel may use Personal Information to contact members, community partners, vendors, service partners and suppliers to complete surveys that are used for marketing and quality assurance purposes.

Impact Austin may also share Personal Information with its community partners, vendors, service providers and suppliers to the extent needed to support Impact Austin’s business and the members’ needs. Suppliers are required to keep confidential Personal Information received from Impact Austin and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

Impact Austin also collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to Impact Austin facilities and computer networks, employee profiles, internal employee directories, Human Resource record keeping, and other employment related purposes. Impact Austin also collects and uses Personal Information to consider candidates for employment opportunities within Impact Austin. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to Impact Austin in connection with these Human Resources programs and functions. Impact Austin will not share Human Resources Data with third parties for non-employment related purposes. Impact Austin requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Policy and as required by applicable law.

5. Administration

5.1 Roles and Responsibilities. Responsibility for compliance with this Policy rests with the Executive Director and the heads of the Board, Programs and Committees together with any individual employees and members collecting, using or otherwise Processing Personal Information. The Executive Director and the heads of the Board, Programs and Committees, in coordination with the Governance Committee, are responsible for implementing further standards, guidelines and procedures that uphold this Policy, and for assigning day-to-day responsibilities for privacy protection to specific personnel and members for enforcement and monitoring.

5.2 Implementation. This Policy is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department, if required. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities.

5.3 Interpretation. In the event of any conflict between this Policy and any supplemental data privacy policy, this Policy will supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Local data privacy policies may provide for stricter data privacy and protection standards than are set forth in this Policy. In the event local data privacy law provides for stricter data privacy and protection than this Policy, the local data privacy law will supersede this Policy in that jurisdiction to the extent necessary to comply with stricter local law.

6 Definitions

“Agent” means any third party that collects and/or uses Personal Information provided by Impact Austin to perform tasks on behalf of and under the instructions of Impact Austin.

“Impact Austin” is Impact Austin and all of its subsidiaries and affiliates globally.
“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.

“Human Resource Data” means Personal information concerning Impact Austin employees or prospective employees.

An “Identified” or “Identifiable” individual is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity.

“Personal Information” is information or data about an “Identified” or “Identifiable” (see definition above) individual. It does not include information that is anonymous, aggregated or in circumstances where the individual is not readily identifiable.

“Policy” means this Global Data Privacy Policy, as revised.

“Processing” or “Process” means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

7. References

- Impact Austin Bylaws
- Supplemental local and departmental policies, procedures and standards on data privacy

8. Appendix

Policy Revision History