

# PRIVACY POLICY UPDATED 24 MAY 2018

The Dictionary Society of North America (DSNA) is committed to protecting your privacy. This Privacy Policy explains our data practices regarding Personal Data (as defined below) and other information that we collect in connection with:

- (i) your use of the website www.dictionarysociety.com
- (ii) DSNA-run events you may attend (for example, the biennial meeting)
- (iii) your use of websites run by partner companies that provide services for DSNA members, including the DSNA membership site (dictionarysocietyofnorthamerica.wildapricot.org) and the DSNA members-only listserv as administrated by Yahoo! Groups (groups.yahoo.com/neo/groups/DSNA/info)

By using our websites and services, you consent to policies and practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our websites.

We will share only very limited Personal Data with outside sources, and only with your permission. We do not sell or otherwise distribute your Personal Data.

#### **Our Collection of Your Personal Data**

The DSNA collects and uses information that, alone or in combination with other information, could be used to identify you ("Personal Data") in order to deliver our products and services, process applications to join programs, and provide support, as described below (please also see the "How We Use Information" section below).

**Personal Data That You Voluntarily Provide To Us**. The DSNA primarily collects Personal Data provided to us by individuals when they interact with our products, services, and customer service. For example, you voluntarily provide us with Personal Data when you become a member, register for our biennial meeting, or contact us with questions concerned the DSNA.

The types of Personal Data that we collect vary based on the services covered on the websites and are provided at your discretion, but generally include your name, address, telephone number, company name, job title, email address, professional affiliations and interests, and other information that you voluntarily submit to us. We do not collect Personal Data on you from third-party sources.

**Automatically Collected Data**. As you interact on our websites, we may collect information about your computer or device and visits to one or more of our websites ("Automatically Collected Data") through

cookies, Internet Protocol (IP) address tracking/URL tracking, and other tools. The types of Automatically Collected Data collected on our websites through the use of these and other tools that we may add from time to time may include: the search terms you used, new or returning user information, browser information, computer or device type, operating system, internet service provider, website usage, referring/exit pages, platform type, date/time stamp, number of clicks, and ads viewed.

#### **How We Use Your Information**

To provide our products and services, respond to requests, and facilitate membership renewal. We use the Personal Data we collect from you (unless otherwise restricted by law) to provide you with services or products you have ordered from us, or to respond to your information requests. For EU Data Subjects, such use is necessary for the performance of the contract between you and us, or to respond to or implement your request prior to entering into a contract with us.

We provide a membership directory of individuals to DSNA members. To opt-out of this membership directory, change the Privacy setting in your profile at dictionarysocietyofnorthamerica.wildapricot.org, or contact us using the information in the "Contact Us" section below.

To manage membership and facilitate the business operations of the DSNA. The DSNA manages membership and sends member communications through third-party vendors. When you become a member of the DSNA, you consent to allow us to give our third-party vendor access to your Personal Data for the purposes of managing membership. You can unsubscribe from these email lists using the link in the footer of any email message. You can also change the contact subscription preferences in your DSNA member profile at any time at dictionarysocietyofnorthamerica.wildapricot.org.

**For correspondence**. If you correspond with the DSNA via email, the postal service, or other forms of communication, we may retain the correspondence and the information it contains, and we may use some of your Personal Data (such as a mailing or email address) to respond to your correspondence.

**For internal analysis.** The DSNA maintains a list of current members which includes Personal Data, as well as a list of all DSNA members, regardless of their current standing, who have been members of the DSNA within the last five (5) years. The DSNA will use this information to analyze membership trends for our own use so that we can better serve our members, and in accordance with the legal requirements as outlined in "Disclosure of Information" below.

**URL and IP Address**. The DSNA collects information about users' IP addresses, including users' utilization of our website, to help us design our website to better suit our website users' needs. We our one of our third-party providers (such as our web host) may use information about your IP address to help diagnose problems with our server, administer our website, analyze trends, track visitor movements, and gather information that assists us in identifying visitor preferences. We also may use your IP address to enhance our security and investigate an actual or potential security incident. For EU Data Subjects, this use of your information is necessary for our legitimate interests in understanding how the website and our services are being used by you, to improve your experience on it, and for ensuring network and information security. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "EU Data Subjects" section below.

Aggregated Data. We may also compile, anonymize, and/or aggregate Personal Data and other information collected about website visitors, as described in this Privacy Policy, and use such anonymized and/or aggregated data for our business purposes, including disclosing such data to our partners, service providers, and/or other third parties for business purposes. This aggregate information does not identify you. For EU Data Subjects, this use of your Personal Data is necessary for our legitimate interests in understanding how the website and our products and services are being used by you, and to improve

your experience of it. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "EU Data Subjects" section below.

**Service Data**. Our use of information collected on behalf of our partner websites is limited to the purpose of providing the service for which the partner has engaged the DSNA and is governed by our contract with that partner and the partner's own privacy policies.

#### **Disclosure of Information**

The DSNA discloses Personal Data that we collect (described above) in accordance with the terms set forth in this section.

We share your Personal Data with third parties who provide certain services to us to assist us in meeting business operation needs. These parties are authorized to process your Personal Data, on our behalf and pursuant to our instructions, only as necessary to provide these services to us. We share your Personal Data with the following service providers:

- Providers of payment processing and accounting, as necessary to process payment from our members and donors;
- Providers helping us fulfill subscription services, such as journal distribution;
- Providers of research and analytics services, including Google Analytics;
- Providers of membership management services.

We may also disclose Personal Data to third parties in the following circumstances: (1) if you request or authorize (when required by the law, we will inform you in advance of the third parties to which we may provide your data and the purpose for doing so, and we will obtain your prior consent for such use); (2) the information is provided (a) to comply with the law (for example, to comply with a search warrant, subpoena or other legal process), (b) to enforce an agreement we have with you, (c) to protect our rights, property or safety, or the rights, property or safety of our employees or others, (d) to investigate fraud, or (e) to respond to a government request or to lawful requests by public authorities, including to meet national security or law enforcement requirements; (3) to address emergencies or acts of God; (4) to address disputes, claims, or to persons holding a legal or beneficial interest; (5) if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of assets, or transition of service to another provider, in which case your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

# **How You Can Access and Change Your Information**

The DSNA acknowledges that you have the right to access your Personal Data. Our website (dictionarysocietyofnorthamerica.wildapricot.org) allows you to access, correct, amend, or delete inaccurate data. If you ask us to remove Personal Data, we will respond within a reasonable timeframe.

Upon request, the DSNA will provide you with information about whether we hold any of your Personal Data. You can update or correct your Personal Data or remove it from our system by making a request to us at the contact information provided below. Requests typically receive a response within thirty (30) days. If access cannot be provided within that time frame, we will provide the requesting party with an estimated date by which the information will be provided. If for some reason access is denied, we will provide an explanation of why access has been denied.

Moreover, when you create a member profile at dictionarysocietyofnorthamerica.wildapricot.org, we will collect the information that you elect to upload to your profile, such as a biography, your education and job history, employer information, and professional interests. You should carefully consider whether you wish to submit Personal Data and whether you wish to make your profile available to other users through the membership directory, and you should tailor any content you submit appropriately. You should also review any additional terms and conditions that may govern your use of our services.

If you are an EU Data Subject, please see the "EU Data Subject" section below for information on your rights in relation to the Personal Data we hold about you.

# **EU Data Subjects**

**Scope**. This section applies if you are an individual located in the European Union ("EU") ("EU Data Subject"). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland.

**Data Controller**. The DSNA is the data controller for the processing of your Personal Data.

Your Rights. Subject to applicable law, you have the following rights in relation to your Personal Data:

*Right of access*: If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

Right to rectification: If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to erasure: You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to restrict processing: You may ask us to restrict or block the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to data portability: Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format to be agreed upon between you and the DSNA. You may reuse it elsewhere.

Right to object: You may ask us at any time to stop processing your Personal Data, and we will do so if we are relying on a legitimate interest to process your Personal Data, unless we demonstrate compelling legitimate grounds for the processing.

Rights in relation to automated decision-making and profiling: You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, that affect you, unless such processing is necessary for entering into, or the performance of, a contract between you and us or you provide your explicit consent to such processing.

Right to withdraw consent: If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.

Right to lodge a complaint with the data protection authority: If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns. You may exercise your rights by contacting us as indicated under "Contact Us" section below.

Legitimate Interest. "Legitimate interests" means the interests of the DSNA in conducting and managing our organization. For example, we have a legitimate interest in processing your Personal Data to analyze how the website and our products and services are being used by you, and to ensure network and information security, as described in this Privacy Policy. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent or those activities are otherwise required or permitted to by law. You have the right to object to processing that is based on our legitimate interests.

# **Our Security Measures to Protect Your Personal Data**

We are committed to taking reasonable efforts to secure the information that you choose to provide us, and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of Personal Data. We restrict access to Personal Data to our Executive Secretary and our service providers (described in the "Disclosure of Information" section above) who need to know the information in order to operate, develop, or improve our services.

Unfortunately, no transmission of Personal Data over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, the DSNA cannot guarantee or warrant the security of any information you transmit to us, or to or from our online products or services. The DSNA has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this Privacy Policy or the security of your Personal Data, please contact us as indicated under the "Contact Us" section below. We retain your Personal Data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements. We retain Personal Data collected through the Platforms we process on behalf of our Clients for as long as needed to

# **Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties**

This Privacy Policy addresses only the DSNA's use and disclosure of your Personal Data. Our website may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, including any third-party vendors we may use in the course of DSNA business operations, and we are not liable for their misuse of Personal Data. We encourage you to be aware that when you go to another website you should carefully read their privacy policy.

#### Children

The website is not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13.

## **Conditions of Use**

By using the website and our services, you agree to the terms and conditions contained in this Privacy Policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use our website or any DSNA benefits or services.

# **Changes to the Privacy Policy**

The DSNA reserves the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online. Your continued use of the website and/or continued provision of Personal Data to us will be subject to the terms of the then-current Privacy Policy. If we make any material changes or if otherwise required by the applicable law, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming active. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact Us**

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please contact as at:

Address: P.O. Box 537 Collingswood, NJ 08108-0537 USA

Email: dsnaadmin@gmail.com