# **Gap Year Association Privacy Policy:**

The Gap Year Association understands the value and importance of individual privacy. We are strongly committed to protecting the privacy of our constituents. Our websites reflect that commitment and we comply with applicable legislation concerning privacy such as General Data Protection Regulations (GDPR). These websites include <a href="https://gapyearassociation.org">https://gapyearassociation.org</a> and <a href="https://gapyearassociation.org">https://gapyearassociation.org</a> and <a href="https://gapyearassociation.org">https://gapyearassociation.org</a>.

This Privacy Policy covers the collection, use, and disclosure of personal information that may be collected by us when you interact with the GYA website. Your information may be captured at times including: when you visit our site, when you subscribe to our online communications or when you contact us by email.

The following information is meant to inform you of how and why we may use your personal information.

We may make changes to this Policy from time to time and we will inform you if we do. Notification will be through an appropriate medium of communication, such as email, text, written notice, and/or website notice, depending on the contact information that we have for you. You can find the current version of this Policy on GYA's website. If you have any questions about this Policy, please contact us at <a href="mailto:info@gapyearassociation.org">info@gapyearassociation.org</a>. We will be happy to answer any queries you have concerning this Notice or the way in which we process or use your personal data. Please read this Policy carefully.

By opting in and using our websites, you are acknowledging that you understand and agree to the terms of this policy, and consent to the manner in which we may collect, use, and disclose your personal information. If you do not agree to the terms of this policy, please do not use our websites and unsubscribe.

When the website is accessed, GYA gathers information regarding browser type, operating system, IP address, and domain name used by the visitor. This information is used to determine areas of use, to assist in making improvements to the web site, and to assess difficulties. Except for what the

visitor voluntarily submits to GYA, personally identifiable information (such as name, e-mail address, password, etc.) is not collected. GYA has no way of verifying individual users to provide a choice as to whether or not general information is collected.

We may collect the following information:

- your IP address
- our URLs you have requested to access
- the dates, times, and methods of requestsURLs of pages that referred you to the Site
- number of bytes transferred and your web browser and operating system platform.

#### Information Use

This information is retained on a permanent basis, during which time the contents are accessible to our website administrators. We have no way of linking IP addresses to any personally identifiable information. This means that user sessions will be tracked by IP address, but a user's identity will remain anonymous.

For individuals under the age of 18, parental consent must be obtained before submitting any personal information in forms found on this website. GYA does not rent, purchase, or sell any personal information provided by our users or prospective students. However, students opting to use a search function may, at their selection of "opting out", expect to not have any information shared with prospective colleges.

This website may contain links to sites outside the Gap Year Association. GYA is not responsible for the privacy practices or the content of external websites.

### Demographics and Interests Reporting

We along with third-party vendors, such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions, and other ad service functions as they relate to our website.

We obtain your personal data from various third-party sources (for example, other institutions (both accredited by GYA and non accredited) that we partner with and/or are GYA members, your other academic institutions, and other service providers). All such information obtained about you is handled in accordance with our policies and with DPA and GDPR, as well as FERPA and other applicable legislation.

## **Opting Out**

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative opt-out page or permanently using the Google Analytics Opt-Out Browser add-on.

If users would like to have personally identifiable information changed or removed from the Gap Year Association database, please contact us at info@gapyearassociation.org. Keep in mind that there will be residual information remaining within the databases, access logs, and other records, which may or may not contain such personally identifiable information. The residual information will not be used for commercial purposes; however, GYA reserves the right, from time to time, to re-contact former customers or users of this site.

#### Remarketing

We work with a company called MultiView, an online ad network, which pays GYA a fee for those who choose to do "retargeting" advertising. MultiView may place anonymous cookies on your computer, and use similar technologies, in order to understand your interests based on your (anonymous) online activities, and thus to tailor more relevant ads to you. You can review MultiView's Privacy Policy on it's website for more information. If you do not wish to receive such tailored advertising, you can visit this page to opt out of most companies that engage in such advertising. (This will not prevent you from seeing ads; the ads simply will not be delivered through these targeting methods.)

We also share, at your option to opt in / out, information gathered in searches for gap year programs. This information is shared with specially-selected colleges and universities that are Official Gap Year Colleges / Universities members with GYA for the purpose of recruiting gap year graduates. It is your choice to opt out of this in the search function by simply toggling a box.

#### Disclosure

Your data may be communicated, in compliance with applicable law, to GYA affiliates and partners, public or private subjects to whom they may be necessary in order to fulfill obligations, regulations, or laws; sensitive data may be communicated to public bodies and authorities (such as public hospitals, public safety authorities, police offices, courts, magistrates, and the like) and to private subjects (such as private hospitals and clinics, security supervisors, and insurance companies) only for purposes relating to health and safety emergency and for the purposes of fulfilling obligations set forth by local laws, regulations, and EU laws. We will not sell, lend, or disclose to third parties any information collected from visitors, except as disclosed in this Privacy Policy or in the event we are required by law to do so. We may disclose information to employees, consultants, and agents who have a legitimate need to know the information for the purpose of fixing or improving the websites and monitoring and improving the security of our network. We also reserve the right to disclose this information when special circumstances call for it, such as when disclosure is required by law or court order or when disclosure is, in our sole discretion, necessary to protect our legal rights, including intellectual property rights. GYA may securely share or transfer your information within GYA's affiliate network (for example, to admissions offices, development projects, and partners in other countries) in order to effectively operate our programs.