



#### INTERNATIONAL DOWNTOWN ASSOCIATION PRIVACY POLICY

LAST UPDATED: March 15, 2024

This privacy notice describes how the International Downtown Association and its affiliate IDA Foundation ("IDA") collect, use, share, and retain personal information that you provide to us or that we collect when you use the IDA website located at <u>downtown.org</u> and other websites owned or controlled by IDA ("Site" or "Sites") or related mobile applications, use IDA products and services and complete related forms, participate in IDA events, or communicate with one of our customer service representatives ("Personal Data.")

Please note that if you disagree with anything in this Privacy Notice, you must not use the sites or mobile applications, use IDA products and services or complete related forms, or provide personal information to use in connection with IDA's products or services.

## **HOW TO CONTACT US**

IDA is headquartered in the District of Columbia, in the United States. You may contact IDA's internal data protection contact if you have any questions or concerns about IDA's policies or practices regarding Personal Data:

Allison Shashok, Vice President of Membership, Marketing & Operations allison@downtown.org
(202) 393-6801
International Downtown Association
1275 K Street, Suite 1000
Washington, DC 20005, USA

The IDA's hours of operation are from 9:00 a.m. to 5 p.m. ET, Monday through Friday (except national holidays). To protect your privacy and security, we will also take reasonable steps to verify your identity. Please do not send us sensitive information, such as your credit card or social security numbers, via e-mail. It is possible that during transmission of your e-mail this information may be intercepted by a third party. We cannot guarantee its safety while in transit. If you choose to contact IDA staff using an e-mail address, a discussion forum, IDA blog, text message or other electronic communication method, or if you choose to complete an online form provided on the Sites you may be asked to provide your name, e-mail address or other personal information. The purpose of collecting this information is to allow staff to respond to your inquiry or to evaluate individual web services. Only authorized staff will have access to the information provided and the information will only be used for the purpose it was intended.

## **HOW WE COLLECT PERSONAL DATA**

Your privacy is important to IDA. We adhere to all applicable privacy laws and regulations affecting your data and strive to adopt best practices when it comes to your privacy.

Registration is required to obtain any product or service (tangible or virtual) offered by IDA. Individuals can register with IDA to receive a login online or by completing a paper form. Some products and services also require IDA membership. For additional information on those products please refer to IDA's product listing or its terms of

service. In all cases, registration requires that a valid mailing address be submitted to appropriately fulfil a product or service request. Online registration requires a valid email be provided because an online profile is created during the registration process.

Occasionally IDA asks for general demographics data as a part of its diversity and inclusion initiatives and commitment.

When purchasing a product or service online, users are asked to provide a credit card number to complete their transaction. IDA does not store credit card information after the transaction is complete. IDA follows Payment Card Industry (PCI) standards for all online and paper sales and this practice is accepted by PCI.

## **HOW YOUR INFORMATION IS USED**

IDA may communicate with its members and customers electronically and through bulk mail advertisements. All electronic communications adhere to the CAN SPAM Act.

Your data is used according to your relationship to IDA. A description of the different relationship types is below. Please note, although IDA controls, operates, maintains and oversees the database in which your data is stored, your data is shared with IDA Canada and IDA Foundation.

#### Nonmember Customer Data

Nonmember customer data generally obtained through online or storefront (paper) registration and sales is for internal IDA purposes only and is not shared or sold to vendors for bulk mail solicitations. It is used to solicit feedback on the product or service purchased and to inform customer of new products and services available for sale. It is also used for market research within IDA, and to develop products and services to benefit the place management profession.

## Member Data

Member data is generally obtained through IDA's online registration or through paper applications submitted for membership. IDA has several <u>partners</u> who have access to membership lists for promotional mailings. Email addresses, telephone numbers, and other demographic data are not made available to our partners.

Member data is used for market research within IDA, and to develop products and services to benefit the place management profession.

#### Co-Branded Partners

From time to time, IDA may offer certain promotions, programs or activities on our Websites or on websites hosted or managed by the IDA that are co-sponsored or co-branded by nonprofit and/or for-profit partners, such as purchasing products or services offered by our partners, or electing to participate in advocacy campaigns, contests, sweepstakes, games or other programs sponsored in whole or in part by our partners, which may be subject to their own terms of use. At the time of engagement, you will be offered an opportunity to choose to authorize IDA to share your information with our partners so you may receive information from the partners. We do not control the privacy practices or terms of use of our co-branded partners; therefore, you should review their privacy practices before you choose to access their products or services.

You are entitled to opt-out from receiving any resulting information from IDA or the IDA Foundation as set forth in this Privacy Policy at any time. However, if at a later date, you decide to opt-out of receiving information from our partners, you will need to contact the partners directly.

# **COMMITMENT TO DATA SECURITY**

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, IDA has implemented the appropriate physical and electronic procedures to safeguard and secure the information we collect online and by paper. For Site security purposes and to ensure that this service remains available to all users, IDA computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals evidence of possible abuse or criminal activity, such evidence may be provided to appropriate law enforcement officials.

The portions of our Site requiring login or data entry by Web users are protected by industry standard security practices. All paper applications are scanned and maintained in a secure server environment.

All records in our database are accessible online by their individual or company owner. To access your information to modify it or to opt out of any of IDA's communications visit downtown.org and click on the Login button to sign in and manage your IDA account. You may also contact us as indicated under the "How to Contact Us" section.

## **WEB BROWSING PRACTICES**

#### Cookies

Our sites uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the site's functionality.

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this Site.

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this).

The Cookies We Use:

- Account related cookies: If you sign up for an account with us then we will use cookies for the
  management of the signing process and My Account. These cookies will usually be deleted when you
  log out however in some cases they may remain afterwards to remember your Site preferences when
  logged out.
- Login related cookies: We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.
- Email related cookies: Our Site offers email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.
- Forms related cookies: When you submit data through an online form, such as those found on contact pages or comment forms, cookies may be set to remember your user details for future correspondence.
- Analytics cookies: Our Site uses certain third-party cookies, such as Google Analytics, Google Tag
  Manager, and Google Adwords. These are trusted analytics solutions on the web for helping us to
  understand how you use the Site and ways that we can improve your experience. These cookies may
  track things such as how long you spend on the Site and the pages that you visit so we can continue to
  produce engaging content.

#### External Links Disclaimer

IDA provides links from our Web pages to external Web sites because they provide information that may interest our customers. This is provided as a convenience only. External links do not constitute an endorsement by IDA of the opinions, products or services presented on the external Site, or of any sites linked to it. IDA is not responsible for the legality or accuracy of information on externally linked sites, or for any costs incurred while using externally linked sites.

## Social Networking Sites and Applications

It is important to note that IDA also provides links to other third-party sites and applications (e.g, LinkedIn, Facebook, X / formerly Twitter, YouTube, Submittable, association management system, Higher Logic). These sites and applications may not follow the same privacy policies as the IDA. For instance, these sites and applications may use cookies, collect data, and use the data in ways that IDA would not. IDA is not responsible for the privacy practices on these other sites.

## **CHILDREN'S PRIVACY**

Our Sites are not directed to children under the age of 13, if you are not 13 years or older, do not use our Site. We do not knowingly collect Personal Data from children under the age of 13. If we learn that Personal Data of persons less than 13 years-of-age has been collected through our Site, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 13 has posted, submitted or otherwise communicated Personal Data to our Site without your consent, please contact us at <a href="downtown.org/contact-ida">downtown.org/contact-ida</a> so that we may take appropriate action to remove the minor's Personal Data from our systems.

## **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. IDA is the data controller for the processing of your Personal Data as described in this Policy.

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 May 25, 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. 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:
  - o If we are relying on a legitimate interest to process your Personal Data unless we demonstrate compelling legitimate grounds for the processing; or
  - o If we are processing your Personal Data for direct marketing.
- 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 "How to Contact Us" section.

Legitimate Interest. "Legitimate interests" means the interests of IDA in conducting and managing our organization. For example, we have a legitimate interest in processing your Personal Data to analyze how the Websites, Apps 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. For more information on your rights, please see "Your Rights" section above.

#### **MODIFICATIONS TO THIS PRIVACY NOTICE**

If we make any material changes to this Notice or the way we use, share or collect personal data, we will notify you by revising the "Last Updated" at the top of this Notice, prominently posting an announcement of the changes on our Site, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to this Notice in the future will be posted on this page and, where appropriate, notification sent to you by e-mail. Please check back frequently to see any updates or changes to this Notice.

## **IDA WEB PROPERTIES**

IDA Web Property	Web Property Link
Website	https://downtown.org/
AMS	https://inspiredleaders.downtown.org/
Social Media	Link
Facebook	https://www.facebook.com/IntlDowntownAssoc/
LinkedIn	https://www.linkedin.com/company/internationaldowntownassociation
X, formerly Twitter	https://twitter.com/IntlDwtnAssoc
YouTube	https://www.youtube.com/user/IDAdowntown
Submittable	https://ida.submittable.com/submit
Higher Logic	https://community.downtown.org/home