

Privacy Policy

Last modified: January 24, 2021

Introduction

The International Clarinet Association ("**Company**", "**ICA**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <http://clarinet.org> or at the members-only website ica.wildapricot.org operated by Wild Apricot (together hereinafter jointly referred to as "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we

will delete that information. If you believe we might have any information from or about a child under 16, please contact us at:

International Clarinet Association
829 Bethel Road, #216
Columbus, OH 43214
EDO@clarinet.org

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website (together referred to as "Information"), including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline ("**personal information**") about payments to and from you and other details of products and service you have purchased from us ("**transaction information**");
- that is about you but individually does not identify you;
- about your internet connection, the equipment you use to access our Website and usage details ("**technical information**"); and/or
- about your preferences in receiving marketing from us and our third parties and your communication preferences ("**marketing information**").

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website.
- From third parties, for example, our business partners. Information collected from third parties is limited to information collected by Wild Apricot and is collected when you sign up for a membership or event.

Information You Provide to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time you become a member of the ICA. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before registering to be a member of the ICA or donating to any of our funding campaigns.
- Your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection

technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

Third-Party Use of Cookies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile. We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the ICA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information or any other type of information disclosed in Information We Collect About You and How We Collect It, held by the ICA about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- To enforce or apply our Terms of Use and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the ICA, our members, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt out by sending us an email stating your request to EDO@clarinet.org.
- **Promotional Offers from the Company.** If you do not wish to have your email address used by the Company to promote our own or third parties' products or services, you can opt out by checking the relevant box located on the form on which we collect your data (the registration form) or at any other time by sending us an email stating your request to EDO@clarinet.org. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to email distributions sent to you as a result of your membership in the ICA, if the email distribution is sent to the entire membership.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt out by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to EDO@clarinet.org.
We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's website.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to EDO@clarinet.org or write us at: 829 Bethel Road, #216, Columbus, Ohio 43214.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our Wild Apricot secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

International Clarinet Association
829 Bethel Road, #216
Columbus, OH 43214

EDO@clarinet.org

Special Information for European Union (“EU”) Users

Beginning May 25, 2018, the processing of personal data of users in the European Union (“EU”) is subject to the EU’s General Data Protection Regulation (the “**GDPR**”). If you use the Website in the EU, this section provides information as it relates to your rights, and our responsibilities, under the GDPR. Under the GDPR, we are your “controller.” To exercise any of the rights described in this section, please see below or submit your request to EDO@clarinet.org. The rights and obligations described

under this Section are in addition to, and not in lieu of, any other rights or obligations described elsewhere in the ICA's website use policies. However, to the extent any other provision of the ICA's website use policies conflict with any provision under this Section, then the provision under this Section shall control and apply with respect to EU users only.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this GDPR section. If you have any questions about this policy, including any requests to exercise your legal rights, please contact our data privacy manager at EDO@clarinet.org.

Your Rights:

Explanation of Your Data

- You have the right to request an explanation of the information that we have about you and how we use that information.

Access & Correction

- You have the right to request access to your data (commonly known as a "data subject access request"). This enables you to receive a copy of the information of yours that we hold and to check that we are lawfully processing your data.
- If we have information about you that you believe is inaccurate, you have the right to request correction of your information.

Deletion & Erasure

- You may request deletion of your information at any time. We will comply with any such request in accordance with applicable law.
- You have the right to be forgotten. This right is also known as the "right to erasure." It is your right to have your information erased or the right to prevent processing in specific circumstances. We will comply with any such request in accordance with applicable law.

Portability

- You have the right of data portability. This right allows you to move, copy or transfer your information from one place to another in a secure manner without interrupting the integrity and usability of your information, pursuant to applicable law.

Restriction

- You have the right to request restriction of processing of your information. This enables you to ask us to suspend the processing of your information in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of your information is unlawful but you do not want us to erase it.
 - Where you need us to hold your information for you to establish, exercise or defend legal claims even if we no longer require it.
 - You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Objections and Complaints

- You have the right to object to our processing of personal data, including for marketing purposes based on profiling and/or automated decision making. We may continue to process your information notwithstanding the objection to the extent permitted under the GDPR.
- You may also have the right to file a complaint relating to our handling of your information with one of the data protection authorities established pursuant to Article 77 of the GDPR and in conjunction with the European Data Protection Board ("EDPB"). For contact information, please visit the EDPB's website at <https://edpb.europa.eu>.

To exercise any of the above rights, or to submit questions, comments or complaints, please contact our data privacy manager.

Grounds for Collection of Your Data:

The GDPR requires that companies processing the personal data of EU users do so only with specific legal grounds. We process the information of EU users as set forth elsewhere in this policy and based on one or more of the grounds specified under the GDPR, such as:

To provide the Website and features you request:

- We must collect and use certain information in order to provide the Website to you. This includes technical information and/or marketing information, which is necessary to maintain, optimize and enhance the Website.

To protect the vital interests of our users or of others:

- We may process your information, transaction information and/or technical information including disclosing data with law enforcement authorities, in case of threats to the safety of users or of others.

For our legitimate interests:

- We may process your Personal Information and/or Navigational Information where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- “**Legitimate interest**” means the interest of conducting and managing our business to enable us to give you the best services and products and the best and most secure experience. This includes collecting and using information:
 - To maintain and enhance our users' safety and security. For example, we may use personal information to prevent use of the Website by users who have engaged in inappropriate or dangerous behavior, such as by retaining information of banned users to prevent their use of the Website.
 - To prevent, detect and combat fraud in connection with the use of the Website. For example, we may use transactional and/or technical information to identify and prevent circumstances when users attempt to defraud us, you, or others.
 - To inform law enforcement officials of criminal acts or threats to public safety.
 - To provide customer support.
 - To optimize the Website and develop new services. This includes, for example, identifying your use habits with respect to the Website to determine whether you might be interested in other services we may develop.
 - For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance the accessibility and security of the Website.

For the legitimate interests of other persons or parties:

- We collect and use your information to the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims to protect the rights and safety of others.
- We may process your information when necessary in regards to a substantial public interest, on the basis of applicable laws.

To fulfill our legal obligations:

- We are subject to legal requirements in the jurisdictions in which we operate that may require us to collect, process, disclose and retain your information. For example, some record keeping laws may require us to keep data for several years.

Consent

- We collect and use your information on the basis of your consent.
- **YOU MAY REVOKE YOUR CONSENT AT ANY TIME BY CONTACTING US AT EDO@CLARINET.ORG.**
- If you revoke your consent, you will not be able to use the Website or any feature that requires collection or use of your information.
- We rely on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you.
- You have the right to withdraw previously provided consent for our processing of your information.

International Transfer of Data

- The ICA is a non-profit corporation organized pursuant to the laws of the State of Delaware, in the United States of America. Accordingly, your personal data will be transferred outside the European Economic Area to the United States.

Data Retention

- We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your information for a longer period in the event of a complaint or if we believe there is the prospect of litigation in respect to our relationship with you.

Time to Respond

- We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests.

No Fee Usually Required

- You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.