KEEWAYDIN FOUNDATION PRIVACY P0LICY

The Keewaydin Foundation ("we," "us," "our") provides camping experiences and challenges that help children achieve significant personal growth by living in a community, being independent and living simply in rustic and natural settings. The Keewaydin Foundation, which includes the Keewaydin Environmental Education Center, also encompasses the summer camps of Keewaydin Dunmore, Keewaydin Temagami (including the Ojibway Lodge), and Songadeewin which are nationally renowned for their "tripping program" (wilderness canoe trips).

The Keewaydin Foundation is committed to maintaining your confidence and trust with respect to your privacy. We are transparent about what personal information we collect about you, where that personal information comes from, how we use the information we hold about you, and the choices you can make about information collection methods. (See "Google Analytics"). Once collected, we handle all such information with the utmost care and confidentiality in conformance with laws of the jurisdiction applicable to you, including but not limited to, the General Data Protection Regulations (GDPR) of the European Union, and the California Online Privacy Protection Act (CalOPPA).

In keeping with the Children's Online Privacy Protection Act (COPPA) – the law that protects children's online privacy --the Keewaydin Foundation does not knowingly collect personal information from any person under the age of 18.

INTRODUCTION

The Keewaydin Foundation collects a variety of personal information from our various constituencies which include:

- parents and or legal guardians of camper or potential campers;
- alumni and former staff;
- supporters (including foundation, corporations, and other supporters); and
- prospective and permanent employees.

We believe our constituents have a right to know how we collect, store, and use information shared with us when they:

- Apply for enrollment at any Keewaydin camp;
- Become a donor or prospective donor to the Keewaydin Foundation;
- Apply for employment with the Keewaydin Foundation; and
- Visit our Keewaydin-managed website (http://Keewaydin.org)

I. PERSONAL INFORMATION WE COLLECT FROM ELECTRONIC, WRITTEN OR ORAL COMMUNICATIONS

The section below explains the Keewaydin Foundation's internal processes for the collection of personal information for the four constituencies identified previously.

Campers and Their Parents (or Legal Guardians) The Keewaydin Foundation collects personal information from camper registrations to conduct our business as a provider of summer camps. The Keewaydin Foundation use this information to ensure that we meet the legal and safety needs of our campers.

Personal Information Collection Sources: We collect personal information provided directly by a parent or legal guardian of a child who may enroll at one of the Keewaydin Foundation's summer camps. We obtain the information in several ways, including:

- Online enrollment forms for any of our summer camps;
- Submission of required forms (either electronically or via paper) including those that cover existing medical conditions or allergies, pharmaceutical needs;
- Email communications from parents or legal guardian to camp directors and staff; and
- Paper forms submitted by a parent to camp administrators.

Personal Information Collected on Campers:

- Child's name, nickname, and contact information,
- Child's date of birth;
- Child's school;
- Child's height and weight;
- Child's swimming abilities;
- Child's medical history;
- Child's pharmaceutical needs;
- Images for use on our website, social media, and promotional materials;
- Travel Authorization Forms (for campers who will be tripping outside the United States); and
- Passport Information (when tripping outside the U.S.)

Parent and or Legal Guardian Information

- Name;
- Contact information (including mailing address, phone numbers (cell, home, business), email addresses (personal and business);
- Billing phone number and address and record of credit card transactions (the Keewaydin Foundation contracts with a third-party vendor for credit card processing and does not store credit card numbers in our data systems.); and
- Images for use on our website, social media, and promotional materials.

Alumni and Supporters: The Keewaydin Foundation collects and maintains personal information about alumni, supporters, event attendees, and volunteers.

Personal Information Collection Sources: We collect personal information in large part directly from our constituents from the following sources:

- Camp enrollment forms;
- Donation information – including credit card donations - and materials accompanying mail donations. *Note: The Keewaydin Foundation contracts with a secure third-party to process credit card donations.*
- Requests for newsletters, brochures, or other content;
- Registration for alumni or supporter events; and
- Employment-related forms from third parties.

Personal Information Collected on Alumni and Supporters: Information that is collected may include:

- Contact information (e.g. email addresses, phone numbers, mailing addresses);
- Date of birth, if provided;
- Online donation submission required information including name, email address, phone number and address, and credit card information. The Keewaydin Foundation stores a record of the transaction; however, the Keewaydin Foundation does not store credit card numbers and expiration dates, except to administer reoccurring or scheduled payments;
- Personal information and history, such as interests, charitable activities, other personal information volunteer engagement and other information we may learn;
- Family information (e.g. marital status, the name(s) of partner or spouse, children names if provided (or if children are themselves alumni);
- Communication preferences (to help us provide tailored and relevant communications);
- Camp and wigwam or longhouse information, and camp years attended;
- Years employed as a staff member;
- Summaries of conversations held with members of the Foundation staff through in-person contact or by email, telephone, or otherwise;
- Membership in Foundation giving societies;
- Attendance at Foundation and camp-related events;
- Volunteer participation with the Foundation;
- Details of stewardship;
- Public, third party databases to augment and validate the accuracy of information maintained by the Keewaydin Foundation on individual donors or prospective donors.

Employees and Prospective Employees: The Keewaydin Foundation has a legitimate interest in recruiting and hiring qualified applicants, complying with laws and regulations that govern our conduct in the U.S., Canada, and countries where we recruit, and to administering the Keewaydin Foundation in an efficient, ethical, and appropriate manner.

Prospective Employees
United States citizens seeking temporary or permanent employment with the Keewaydin Foundation and who are invited by individual Camp Directors to complete an employment application will be directed to a password protected website.

International Prospective Employees: The Keewaydin Foundation uses the third party services of CCSUSA, IENA, and CIEE to collect and screen application materials on individuals living outside the U.S. Country-specific privacy policies can be found at: https://www.ccusa.com/CONTACT-US/Worldwide-Offices, https://www.iena.org/privacy-policy/ and https://www.ciee.org/privacy-notice.

Personal Information collected on Prospective Employees may include but is not limited to:
- Contact information (e.g. email addresses, phone numbers, mailing addresses);
- Date of birth;
- Employment history;
- Fluency in languages;
- Certifications (lifeguard, First Aid, etc.);
- Resume;
- Reference names and contact information; and
- Skills related to camp activities.

Employees: Further personal information collection occurs at hiring and throughout employment with the Keewaydin Foundation. Such personal information may include:
- Payment information, such as bank and bank account number for processing compensation;
- Information to allow us to process benefits (when applicable, health insurance, retirement, HSA accounts, etc.);
- Tax information, such as government identification numbers, social security numbers, ISN numbers, work visas, wages and filing status;
- Personal information and history, such as marital status and other information about background, including criminal background checks, and when relevant for position or required by law, driving record, citizenship and work authorization status;
- Family information for inclusion in benefits plans;
- Demographic information, such as gender, age and date of birth;
- Health information, such as medical conditions that may impact ability to work; and
- Images for use on our staff website listings and camp-related photos.

Personal Information Collected by Automated Means

Keewaydin Foundation-managed websites may contain links to other websites. We provide these links solely for convenience and information. Different websites have different privacy practices. Keewaydin website users should always check the privacy notice of the specific site they are visiting to understand the privacy practices associated with that site. The Keewaydin Foundation is not responsible for the content or privacy practices of third-party websites.

Web Services Google Analytics: The Keewaydin Foundation may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies," which are text files placed on the website user's computer, to help the website analyze how they use our websites. See Google's Privacy Policies for more information.

In addition to cookies, Google Analytics may collect web beacons/pixel tags, log files, and other technologies to collect certain information about visitors to our websites, uses of our online services, and interactions with our emails and online advertisements. For example, through these means, we may automatically collect information such as browser type, operating system, mobile device type and carrier, Internet service provider ("ISP"), and IP address.

We may also collect information about use of and interaction with the website (such as the webpages viewed, whether you open, forward, or click-through links, emails, and ads) and other site usage data. Collecting this information, and linking it with personally-identifiable information, helps us to best tailor our website and enhance online experience by saving users preferences while they are visiting a particular site, and to help identify site features and content that may be of particular interest to them.

Do Not Track

Website users may set their browser settings to stop accepting new cookies, to receive notice when they receive a new cookie, to disable existing cookies, and to omit images (which will disable pixel tags). Note that the opt-out will apply only to the browser that the user has accessed when adjusting tracking settings or cookie preferences. Our system may not respond to Do Not Track requests or headers from some or all browsers. Without cookies or pixel tags though, a website user may not be able to take full advantage of all of our website features.

Third parties, such as Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from the Keewaydin Foundation websites and elsewhere on the Internet and use that information to provide measurement services and target ads. To opt out of such third-party use, website users may utilize one of these tools: http://www.aboutads.info/choices (US) and http://www.youronlinechoices.eu/ (EU).

II. HOW THE KEEWAYDIN FOUNDATION USES PERSONAL INFORMATION

Camper and Parents (or Legal Guardians): Personal information, and personal information on a child is used by the Keewaydin Foundation for several interdependent purposes in support of camp-related and foundation-related activities including:

- To help you complete a child's application and assist you with travel and other logistical arrangements;
- To process an enrollment application at any of the Keewaydin Foundation camps;
- To keep a child's health at the forefront of our camp operations;
- To send emails and other communications relating to camp and other Foundation-related correspondence;
- To respond to inquiries and provide customer support;
- For internal record keeping, including the management of any feedback or complaints;
- For administrative purposes (e.g. in order to process a payment to enroll a child in camp);
- To send marketing communications; and
- To investigate security issues and prevent fraud.

Communications may be sent by postal mail, telephone, or electronic means (principally by email), depending on the contact details we hold, the consent that a parent or legal guardian has provided, and the individual preferences expressed about the types of communications they wish to receive.

Parents may opt out of receiving communications from the Foundation and its camps when they enroll their child or by emailing info@keewaydin.org or by calling 802-352-4247.

Alumni and Supporters: Personal information, and personal information on alumni and our supporters is used by the Keewaydin Foundation for a number of interdependent purposes in support of camp-related and foundation-related activities including:

- Publications (e.g. alumni magazine *Northwest Wind,* camp newsletters (e.g., *The Kicker, From the Heart*, and *The Tattler,* and updates about the Foundation and its camps);
- Fundraising appeals, tailored proposals, and requests for donations;
- Volunteer opportunities;
- Thank you calls for donations; and
- Invitations to Foundation-or camp-related events.

The Keewaydin Foundation also uses personal information to:

- Manage our internal record keeping and to address feedback or complaints;
- Administrative purposes (e.g. in order to process a donation or to administer a registration for an event);

- For marketing and promotional purposes (images, etc.)
- Conduct surveys, including research from public sources about when and whether donations or funding appeals may be of interest to our alumni and supporters.

Communications may be sent by postal mail, telephone, or electronic means (principally by email), depending on the contact details we hold, the consent that has been provided, and the preferences expressed by our alumni, parents, and supporters about the types of communications they wish to receive;

Alumni, Parents, and supporters may opt out of receiving communications from the Foundation and for Camp-related activities by emailing info@keewaydin.org or by calling 802-352-4247.

The Keewaydin Foundation strives to ensure that any opportunities we present are aligned with alumni and supporter interests, based on the requests made to us, research we conduct, and information our alumni and donors have shared with us.

Staff and Prospective Employees

Prospective Employees

The Keewaydin Foundation processes all the information we collect from or about prospective employees to meet these purposes:

- Evaluate eligibility for employment;
- Evaluate applications for employment at the Keewaydin Foundation or its camps;
- Communicate with applicants about the Keewaydin Foundation and their application; and
- Manage acceptance of our offer of employment and begin the process of onboarding a new employee if offered a position with the Keewaydin Foundation.

Employees

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with the Keewaydin Foundation. Such uses include:

- Administering pay and benefits;
- Processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- Establishing training requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action, or termination;
- Establishing a contact point in the event of an emergency;
- Complying with applicable labor or employment statutes;
- Ensuring the security of Foundation and camp-held information; and

- Such other purposes as are reasonably required by the Keewaydin Foundation.

III. HOW THE KEEWAYDIN FOUNDATION SHARES PERSONAL INFORMATION

Service Providers. Keewaydin Foundation-managed websites may contain links to other websites and third-party companies to administer and provide services on our behalf. We provide these links solely for convenience and information. Different websites have different privacy practices. Keewaydin website users should always check the privacy notice of the specific site they are visiting to understand the privacy practices associated with that site. These Third parties contracting with the Keewaydin Foundation may only use personal information as directed by the Keewaydin Foundation and in a manner consistent with our Privacy Policy and are prohibited from using or disclosing information for any other purpose. However, the Keewaydin Foundation is not responsible for the content or privacy practices of third-party websites.

Compliance with Laws and Law Enforcement Requests; Protection of Rights.
The Keewaydin Foundation may disclose to parties outside of Keewaydin Foundation, personal information and files that we have collected when we have a good faith belief that disclosure is reasonably necessary to (a) comply with a law, regulation or compulsory legal request; (b) protect the safety of any person from death or serious bodily injury; (c) prevent fraud or abuse of Keewaydin Foundation databases; or (d) to protect the property rights of the Keewaydin Foundation and its camps.

IV. HOW THE KEEWAYDIN FOUNDATION PROTECTS PERSONAL INFORMATION

Security Measures
The security of personal information is important to us. The Keewaydin Foundation maintains administrative, technical, and physical safeguards to protect against unauthorized use, disclosure, alteration, or destruction of the personally-identifiable information we collect. Each web page is secure and any information collected is encrypted by 256 SSL software, the standard for secure Internet network connection. While we make every effort to ensure the integrity and security of our network and systems, the Keewaydin Foundation cannot guarantee our security measures.

The Keewaydin Foundation has a separate internal policy for staff to ensure the protection of personal information on campers, parents, alumni, supporters, and employees.

V. RETENTION OF PERSONAL INFORMATION

Alumni, Parents, and Supporters
We will retain camper, parent, and donor information for as long as needed to provide our services. We may also retain and use your personal data in order to comply with our contractual or legal obligations, audit requirements, resolve disputes, and prevent abuse.

Prospective Staff and Employees
Personnel applications will be retained only for employees who are hired at the Keewaydin Foundation.

The Keewaydin Foundation will retain your personal information for as long as your employment with us lasts, and for a certain period after your employment with us has ended. To determine that period, we take into account our legal and regulatory obligations (such as financial reporting obligations and equal opportunity or anti-discrimination reporting obligations) and whether we may need to retain personal information to resolve disputes, make and defend legal claims, conduct audits, pursue legitimate business purposes and/or enforce our agreements.

VI. YOUR RIGHTS REGARDING PERSONAL DATA

You have a variety of legal rights regarding the collection and processing of personal data. These rights vary depending on the laws **(including the EU's GDPR and Canada's PIPEDA)** of the jurisdiction applicable to you, and may include:

- The right to know whether, and for what purposes, we process personal data about you;
- The right to be informed about the personal data we collect and/or process about you;
- The right to access, modify, and correct personal data about you (as set forth in more detail below under "Accessing, Modifying, Rectifying, and Correcting Collected Personal Data");
- The right to know with whom we have shared personal data about you, for what purposes, and what personal data has been shared; and
- The right to file a complaint concerning our processing of your personal information with the data protection authority in your applicable jurisdiction.

Accessing, Modifying, Rectifying, and Correcting Collected Personal Data.
The Keewaydin Foundation strives to maintain the accuracy of any personal data collected from you and will use commercially reasonable efforts to respond promptly to update our database when you tell us the information in our database is not accurate. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes.

Please review personal information carefully before submitting it to us and notify us as soon as possible of any updates or corrections.

In accordance with applicable law, you may obtain from us certain personal data in our records. If you wish to access, review, or make any changes to personal data you have provided to us, you may do so at any time by contacting us at the Keewaydin Foundation Office at info@keewaydin.org, or by calling 802-352-4247. Please be prepared to provide reasonable information to identify yourself and confirm your request. We may request certain reasonable additional information (that may include personal data) to help us validate the request and/or to clarify or understand the scope of your request. Please note that we reserve the right to deny access as permitted or required by applicable law.

Your California Privacy Rights. In addition to the above-listed rights, California privacy law provides individuals with enhanced rights in respect of their personal data.
Shine the Light. California Civil Code Section 1798.83, known as the "Shine the Light" law, permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge.

We do not disclose personal data protected under the Shine the Light law to third parties for their own direct marketing purposes.

VII. UPDATES TO THE PRIVACY POLICY

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Keewaydin Foundation. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice.

We will use reasonable efforts to notify you in the event material changes are made to our processing activities and/or this Privacy Notice, such as by posting a notice on the Keewaydin Foundation website, or sending you an email. Your continued use of Keewaydin Foundation websites or services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice.

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