

## PRIVACY POLICY

**Updated March 11, 2024**

This privacy notice and policy represents an agreement between The American Council of Learned Societies ("**we**", "**us**" or "**our**"), and our users ("user" or "you"). It describes how and why we may collect, store, and use ("**process**") information gathered when you use our site(s) and portals ("**Services**"), such as when you:

- Visit our website at <http://www.acls.org>, its sub-sites, or other portals within our domain or purview.
- Apply to Fellowship, Grant, or other programs
- Engage with us in other related ways, such as event registration, newsletter or other information sign up, or donations.

Please carefully review this privacy policy entirely. This page will help you understand your privacy rights, options, and controls. If you do not agree with our policies and practices, please discontinue use of our sites and services. If you are a user of our services and after reviewing this policy, you wish to continue but you still have questions or concerns, please contact us at [privacy@acls.org](mailto:privacy@acls.org),

This policy is updated periodically. The effective date of this policy can be seen at the top of this page.

### KEY POINTS

#### **What personal information do we collect?**

When you visit, use, or navigate our websites and portals we may request that you share personal information depending on how you interact with us and our portals and sites, the choices you make, and the products and features you use.

We may collect sensitive personal information, when necessary, with your consent, for the purpose stated at the gathering portal, or as otherwise required by applicable law.

#### **Information gathered from third parties.**

We may gather and integrate additional information from public sources and web sites.

#### **What is collected?**

**Data you submit.** The personal information that we collect depends on the context of your interactions with us and the services, the choices you make, and portals you use. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Job titles

- Contact preferences
- Residential addresses
- Billing addresses
- Debit/Credit card numbers
- Social security numbers

**Additional Sensitive Information.** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Student data
- Information revealing race or ethnic origin

**Payment Data.** We may collect data necessary to complete a transaction, donation, or make a payment, such as your banking information. All donation data is processed by ‘Classy Non-Profit Payment Processing.’ Credit card information collected by Classy undergoes a tokenization process performed by our vendor and is not stored by Classy directly. You can view the Classy privacy policy here: <https://www.classy.org/terms/privacy>. Classy also allows for donations to be made via ‘PayPal’. You can also view the PayPal privacy statement here: <https://www.paypal.com/us/legalhub/paypal/privacy-full>.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

**Information automatically collected.** Some information, such as your Internet Protocol (IP) address and/or browser and device characteristics, is collected automatically when you visit our site and portals. It is used for security purposes only and is part of standard data capture, used only for that purpose as needed.

**Tracking technologies/Cookies.** ACLS does not use Cookies to collect your device information or track your activities on our web sites and portals. Some web browsers have an optional setting called Do Not Track (DNT), which you can enable. DNT is not applicable to sites under the ACLS.org domain name, but CAN be enabled if you wish to prevent tracking on the payment sites we use. It must be noted that some functionality may be affected or lost on the (most or all) payment sites if this function is enabled.

**How do we process your information?** Your information is used only for the stated purpose given at the respective portal when it is gathered or as stated in the invitation email initially sent to you. Additional information gathered independently via public sources may be integrated with collected data where relevant.

**Data Use** The intended use of your data and contact information, by ACLS, is stated in any invitation you receive from us and may also be stated at the portal where you interact or input the information. Some examples of regular recurring data use, may include, but are not limited to:

- ACLS Fellowship and Grant Program announcements and news
- ACLS Newsletters
- ACLS event invites
- Reviewer Invites
- ACLS program awardee administration
- Fundraising
- Surveys
- Applicant Portals
- Statistical reports

**Is your data shared with any other entities?**

ACLS may share some information collected with program funders and partners as part of the regular administration of the program. We do not share information with any other third parties and do not sell or trade mailing lists or other data for any reason. Email contact data may be submitted for delivery via a third-party portal or application, but we retain full control of the data, and that party does not retain any of it for their own use.

**Data Security.**

We use organizational security measures and technical processes and procedures to secure and protect your personal information once received. However, no electronic transmission across the internet can be guaranteed to be perfectly secure. While all transmissions and sessions between you and us are encrypted and stored data is similarly protected, neither of us has complete control of every facet of this process and there is still the potential for unauthorized actors to attempt interception or compromise. We monitor and protect against this on systems we control, but intermediate systems may have a currently unknown vulnerability that may facilitate a later compromise. We encourage you to monitor your sensitive personal data that you share with us or any other entity.

**Data Retention**

We retain your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law. Some record of financial transactions may be kept indefinitely.

**System interaction with minors:**

We do not intentionally collect data from persons under 18 years of age. By using our sites and portals, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the sites and portals.

**What are your rights?**

Our privacy policy is modeled and designed to conform to several existing and emerging "User Rights" acts and amendments in both the United States (US) and The European Union (EU). The General Data Protection Regulation (GDPR), while EU based, is a gold standard that defines and governs the ways in which entities can use, process and store personal data/information about an identifiable living person.

Our policy conforms to the GDPR and additionally, some localities/States in the US (*California, Virginia, Colorado, and Connecticut*) that have similar specific rights and options for managing how entities gather, store, or continue to use your data after initial ingestion. The GDPR covers most of the rules in these four states and therefore this model applies to them entirely. You can read more about the specifics of the GDPR here at one of its official sites. <https://gdpr.eu/>.

**Your rights with us as we conform to the GDPR**

- The right to be informed. – Right to review your PID
- The right of access. – Right to receive copy of your data
- The right to rectification. – Right to request adjustment
- The right to erasure/be forgotten. – Right to be removed from all systems
- The right to restrict processing. – Right to request pause or halt to processing
- The right to data portability. – Right to digital version of your data
- The right to object. – Right of exclusion for marketing
- Rights relating to automated decision making and profiling. – Right to deny any entity acting on your behalf.

## **Additional Information.**

Some additional, US regional privacy policies exist and may also apply to you, based on residency. The rights they seek to enforce are already covered by the combination of our model policy, the GDPR and additional internal policies we have adopted. We have provided some starter links to more information on the currently established regional policies in the US.

### **California**

<https://oag.ca.gov/privacy/ccpa>

### **Virginia**

<https://law.lis.virginia.gov/vacodefull/title59.1/chapter53/>

### **Connecticut**

<https://portal.ct.gov/AG/Sections/Privacy/The-Connecticut-Data-Privacy-Act>

### **Colorado**

<https://www.koleyjessen.com/newsroom-publications-colorado-enacts-privacy-act>

## **Exercising your rights?**

You are entitled to the above-listed rights and can request a full record, adjustment, or removal of any or all pertinent data we have collected. However, under some circumstances, some information may need to be retained for legal and or financial tracking and reporting as required by law. You have the right to request access to the personal information we collect from you, change that information, or request we delete it. To request to review, update, or delete your personal information you may contact us via one of the following methods:

### **Mail:**

American Council of Learned Societies  
ATTN: Data Protection Team  
633 3<sup>rd</sup> Ave – 8<sup>th</sup> Floor.  
New York, NY 10023

**Or contact us via Email:** [privacy@acsls.org](mailto:privacy@acsls.org)