

## Privacy Policy

### **Updated January 2025**

Thank you for choosing to be part of our community at Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [info@campstellamaris.org](mailto:info@campstellamaris.org)

Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris operates as a children’s camp, rental facility, temporary residence facility, provider of teambuilding and field trip experiences, and other related programs. Emails originating from us will end with: @campstellamaris.org. We use the following phone numbers: (585) 346-2243, (585) 346-6921, (585) 613-2175.

### **AGREEMENT AND PARTIES**

We respect the privacy of the visitors to the campstellamaris.org website (“website” or “site”). This privacy policy (“privacy policy” or “policy”) is an agreement between Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris and you, as the user of Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris website (“you”). This agreement tells you when this policy is effective, what information we collect from you, how we might use it, how you can review or change the personal information you provided to us, how we may change this policy, and the steps we take to ensure that your personal information is protected.

### **AGREEMENT TO TERMS OF PRIVACY POLICY AND TERMS OF USE**

All activities in which you may engage on this website are voluntary. You are not required to provide any personal information to us unless you choose to access features on this site which require the information. If you do not agree with the terms of this policy or other terms of use on this website, then you should immediately exit this website and discontinue using the site. If you do not agree with the terms of our privacy policy and our terms of use posted here, please do not provide us with personal information, and leave this website. The terms of use of this site are expressly incorporated herein by reference and made a part of this policy. By using Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris websites, you signify that you agree to the terms of this privacy policy as well as to our terms of use.

When you visit our websites and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we

collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website, and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “Sites”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

## **WHAT INFORMATION DO WE COLLECT?**

### **Personal information that you disclose to us**

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or otherwise contacting us. The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:

- **Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, age, and other similar contact data and demographic data.
- **Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.
- **Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor, and you should review its privacy policies and contact the payment processor directly to respond to your questions. Our payment processor is Paysafe. We do not store your full credit or debit card number in our database. We store only a subset of the numbers and a token. We store the last 4 digits. For security, the Paysafe database is PCI Level 1 Compliant and meets 3D Secure 2.0 requirements. Some payments on our websites are processed through PayPal. You can review PayPal’s privacy policy at <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

Websites beginning with [campstellamaris.campintouch.com/](http://campstellamaris.campintouch.com/) may look like Camp Stella Maris’ website but are hosted through CampMinder. Additional personal data is collected,

processed, and stored through CampMinder on behalf of Camp Stella Maris. You can review CampMinder’s privacy policy at <https://campminder.pactsafe.io/#privacy-policy>.

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**

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Sites and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many entities, we also collect information through cookies and similar technologies.

Our database, Campminder, uses cookies to remember your login, preferences, cart selections, etc. The cookies are designed to greatly improve your online experience. Their Privacy Policy can be viewed at <https://campminder.pactsafe.io/#privacy-policy>

### **Information collected from other sources**

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

### **HOW DO WE USE YOUR INFORMATION?**

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (“Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), with your consent (“Consent”), and/or for compliance with our legal obligations (“Legal Reasons”). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To send you marketing and promotional communications for Business Purposes. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “WHAT ARE YOUR PRIVACY

RIGHTS” below).

- Deliver targeted advertising to you for our Business Purposes. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

## **WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. **No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.** CSM uses Campminder for messaging services. Their Messaging Term and Conditions can be viewed at <https://campminder.pactsafe.io/#messaging-terms-conditions>

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our entity to another company.
- With your Consent. We may disclose your personal information for any other purpose with your consent.

## **DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

- Use of Cookies. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. We use cookies for our online registration accounts, Google Analytics, and to improve the performance of our websites. You agree to our use of cookies by continuing to use our website(s). Cookie settings can be controlled through your Internet browser. If you block our cookies, though, some features and functionality of our websites may not operate as expected.
- How We Respond to “Do Not Track” Disclosures. We are strongly committed to not sharing nonpublic information with third parties. Under this Privacy Policy, we may share your information only under particular situations, as described in this Policy. Because we protect all users in this manner, we do not change our behavior in response to a web browser’s “do not track” signal. If you do not want Google Analytics to collect and track your data, you may opt-out on your own by downloading Google Analytics Opt-out Browser Add-on. For more information go to <https://tools.google.com/dlpage/gaoptout>.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Our network is protected by a hardware based firewall. Data protection is in place via endpoint protection

software provided by our IT management provider, The Roman Catholic Diocese of Rochester

Please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

### **DO WE COLLECT INFORMATION FROM MINORS?**

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 years old. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [info@campstellamaris.org](mailto:info@campstellamaris.org).

For employment applications only, we do collect data from 16- and 17-year-olds. This data is strictly used for this purpose.

### **HOW CAN YOU DELETE OR MODIFY YOUR PERSONAL INFORMATION?**

You may opt out of receiving any emails from Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris. Additionally, you can choose to have all your personal information deleted from our database. You may opt out, or delete or modify your personal information by contacting Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris at [info@campstellamaris.org](mailto:info@campstellamaris.org). We encourage you promptly to update your personal information when it changes.

### **DO OUR SITES CONTAIN LINKS TO THIRD PARTY WEBSITES?.**

For your convenience and to improve the usage of the website, we may insert links to third parties on this site. This privacy policy does not apply to such third-party websites. These links take you outside our service and off Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris's sites and are beyond our control. This includes links from partners that may use Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris' logos as part of a co-branding agreement. The sites those links can take you to have their own separate privacy policy and although we seek to protect the integrity of our site, Camp Stella Maris of Livonia, Inc, dba Camp Stella Maris is not liable for the content and activities of those sites. Your visits and access to such websites is at your own risk. Please note that those other sites may send their own cookies to users, collect data, or solicit personal information.

### **WHAT ARE YOUR PRIVACY RIGHTS?**

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites. To opt-out of interest-based advertising by advertisers on our Sites visit <http://www.aboutads.info/choices/>.

### **DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

### **DO WE MAKE UPDATES TO THIS POLICY?**

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

### **HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may email us at [info@campstellamaris.org](mailto:info@campstellamaris.org) or write Camp Stella Maris, 4395 East Lake Road, Livonia, NY 14487