



## **Tribal Share Privacy policy**

(as of 12.1.22)

### **Introduction**

We are committed to safeguarding the privacy of our website visitors, donors, sponsors and service users. Tribal Share, LLC and its subsidiaries and affiliates including Tribal-ISAC (“Tribal Share”) exist to provide connection, security information sharing and opportunities to the Native American and Alaska Native communities. We are both a 501(c)(3) charitable organization and an information sharing platform. By joining as a Member of one of our DBA entities, through a donation, or by participating in any of our services you are giving permission for us to both gather and share your information and send you information relevant to our services and opportunities. To those joining or participating from a tribe or tribal enterprise/corporation the information we share within normal Membership services is limited to your name, title and organization. To our vendor partners, we believe you aim to serve, support and connect with the tribal community and therefore we may collect and share information such as your name, company, and contact information including email, phone and mailing address.

Tribal Share respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data we collect from you, including when you visit our website (regardless of where you visit it from), handle your personal data in connection with any of our events, activities or with our websites (tribalisac.org or tribalshare.org), and tell you about your privacy rights and how the law protects you (“Privacy Policy”).

### **1. Important Information And Who We Are**

This privacy notice aims to give you information on how Tribal Share collects and processes your personal data through your use of this website, including any data you may provide through this website, or when you sign-up as a Tribal Share Member, subscribe to our communications, sign-up for or request information about our products or services, or take part in a webinar or any planned event.

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.



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### **2. Controller Tribal**

Share is the entity that is the controller and responsible for the websites located at TribalShare.org and TribalSAC.org.

#### Contact Details

Please contact us: via e-mail at [info@tribalisac.org](mailto:info@tribalisac.org).

#### Third-party Links

Tribal Share website(s) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **3. The Data We Collect About You**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, title, your employer.
- Contact Data includes business address, corporate or personal email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our websites, products and services.
- Marketing and Profile Data includes your interests and preferences in receiving marketing from us and select third parties, your communication preferences and survey responses.



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We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

### **If You Fail To Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **4. How Is Your Personal Data Collected?**

We use different methods to collect data from and about you including through:

- Direct interactions. You may share with us some of your Identity and Contact Data by filling in forms or by corresponding with us by direct contact, post, phone, email or otherwise. This includes personal data you provide when you:
  - inquire about our products or services
  - apply for a job opening
  - request marketing to be sent to you
  - Complete a Member form or any event registration
  - enter a competition, promotion or survey
  - give us some feedback



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- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please learn more about the cookies we use and about setting your preferences at the Cookie Preferences link at the bottom of this page.
- Third parties or publicly available sources. We may receive analytics and advertising data about you from the sources listed below, as well as, public sources. Please use the following links for more information about how Google and LinkedIn collect and use data when you visit their partners' websites or apps:
  - Google - [google.com/policies/privacy/partners/](https://www.google.com/policies/privacy/partners/)
  - LinkedIn - [linkedin.com/legal/privacy-policy](https://www.linkedin.com/legal/privacy-policy)
  - Facebook - [facebook.com](https://www.facebook.com/legal/FB_Work_Privacy) - [https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy)
- Tribal Share uses Google Analytics on the Website. This is a tool developed by Google and used to collect information, which permits evaluation of the use of the Website, analysis of your behavior and improvement of your experience with the Website. You can obtain more information about how to opt out of Google Analytics at: <https://tools.google.com/dlpage/gaoptout>.

## 5. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- To verify your identity and assist you, in case you lose or forget your login / password details for any of Tribal Share's registration services, to allow you to access different restricted areas and sections of the Website (such as the Customer Portals), to request quotes, to send messages to Tribal Share, and to provide any other Services which you may request ("Service Provision")
- For connecting you with other Tribal Share or Tribal-ISAC Members to provide access to opportunities, security information or specific Member services ("Membership")
- For future marketing, promotional and publicity purposes, including to carry out direct marketing, market research and surveys, via e-mail and/or SMS ("Marketing")



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- To create a profile of you as a Website user, through the use of profiling cookies and by collecting and analyzing information on the preferences you select and choices you make in the Website, as well as your general activities on the Website. This profile will be used to give you information about other websites / services which Tribal Share believes you may be interested in, and to show you information and advertisements which may be relevant to you and your interests. All algorithms involved in this processing are expected to ensure the processing's fairness and control for bias ("Profiling")
- For compliance with laws which impose upon Tribal Share the collection and/or further processing of certain kinds of Personal Data ("Compliance")
- For development and administration of the Website, in particular by use of data analytics regarding how you and other users use the Website, as well as the information and feedback you provide, to improve our offerings ("Analytics")
- To prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website ("Misuse/Fraud")

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending our or third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by opting out of future communications.

### **6. Grounds for processing and mandatory / discretionary nature of processing**

Tribal Share's legal basis to process your Personal Data, are as follows:

- Service Provision: processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you. It is not mandatory for you to give Tribal Share your Personal Data for these purposes; however, if you do not, Tribal Share will not be able to provide any Services to you.
- Membership: processing for this purpose is based on your consent, given by providing your information, registering, updating information or otherwise providing us with your information. It is not mandatory for you to give consent to Tribal Share for use of your Personal Data for this purpose, and you will suffer no consequence if you choose not to (aside from not being able to benefit from greater user experience regarding the Website). Any consent given may also be withdrawn at a later stage.
- Marketing: processing for these purposes is based on Tribal Share's legitimate interest in promoting its goods and services to its existing and potential customer/member base. It is not mandatory for you to allow Tribal Share to use your Personal Data for these purposes, and you will suffer no consequence if you choose not to (aside from not being able to receive further marketing communications from Tribal Share).



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- **Profiling:** processing for this purpose is based on your consent, given by accepting the use of profiling cookies. It is not mandatory for you to give consent to Tribal Share for use of your Personal Data for this purpose, and you will suffer no consequence if you choose not to (aside from not being able to benefit from greater personalisation of your user experience regarding the Website). Any consent given may also be withdrawn at a later stage.
- **Compliance:** processing for this purpose is necessary for Tribal Share to comply with its legal obligations. When you provide any Personal Data to Tribal Share, Tribal Share must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.
- **Analytics:** Information collected for this purpose is used to allow Tribal Share to understand how users interact with the Website and to improve the Website accordingly, with the aim of providing a better user experience.
- **Misuse/Fraud:** Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Website (for potentially criminal purposes).

## 7. Recipients of Personal Data

Your Personal Data may be shared with the following list of persons / entities (“Recipients”):

- Persons, companies or professional firms providing Tribal Share with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services
- Entities engaged in order to provide the Services (e.g., hosting providers, mailing services or e-mail platform providers)
- Tribal Share Members that you have agreed to share your Personal Data with
- Persons authorized by Tribal Share to perform technical maintenance (including maintenance of network equipment and electronic communications networks)
- Persons authorized by Tribal Share to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., employees of Tribal Share)
- Other companies within the Tribal Share Group
- Public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities



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### **8. Transfer of Personal Data**

Considering Tribal Share's nationwide presence and business operations, your Personal Data may be transferred to Recipients located in several different States. Tribal Share implements appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, using safeguards or conditions considered adequate to the transfer at hand.

### **9. Retention of Personal Data**

Personal Data processed for Membership and Service Provision will be kept by Tribal Share for the period deemed strictly necessary to fulfil such purposes – in any case, as these Personal Data are processed for the provision of the Services, Tribal Share may continue to store this Personal Data for a longer period, as may be necessary to protect Tribal Share's interests related to potential liability related to the provision of the Services.

Personal Data processed for Marketing will be kept by Tribal Share until you opt-out or unsubscribe. Once this is done, Personal Data will no longer be used for these purposes, although it may still be kept by Tribal Share, in particular as may be necessary to protect Tribal Share's interests related to potential liability related to this processing.

Personal Data processed for Profiling will be kept by Tribal Share from the moment you give consent until the moment you withdraw the consent given. Once consent is withdrawn, Personal Data will no longer be used for these purposes, although it may still be kept by Tribal Share, in particular as may be necessary to protect Tribal Share's interests related to potential liability related to this processing.

Personal Data processed for Compliance will be kept by Tribal Share for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for Analytics and Misuse/Fraud will be kept by Tribal Share for as long as deemed strictly necessary to fulfill the purposes for which it was collected, unless you validly object to the processing of your Personal Data for these purposes.



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### **Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time by checking or unchecking relevant boxes by following the “Unsubscribe” links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, Membership, product/service experience or other transactions].

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

Types of cookies used by the Website(s).

The Website(s) use the following types of cookies:

- Browsing or session cookies, which are strictly necessary for the Website’s operation, and/or to allow you to use the Website’s content and Services.
- Analytics cookies, which allow Tribal Share to understand how users make use of the Website, and to track traffic to and from the Website.
- Function cookies, which are used to activate specific Website functions and to configure the Website according to your choices (e.g., language), in order to improve your experience.
- Profiling cookies, which are used to observe the preferences you reveal through your use of the Website and to send you advertising messages in line with those preferences.





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Tribal Share also uses third-party cookies – i.e. cookies from websites / web servers other than the Website, owned by third parties. These third parties will either act as independent data controllers from Tribal Share regarding their own cookies (using the data they collect for their own purposes and under terms defined by them) or as data processors for Tribal Share (processing personal data on Tribal Share’s behalf). For further information on how these third parties may use your information, please refer to their privacy policies:

Google

- <https://policies.google.com/technologies/ads>
- <https://policies.google.com/privacy>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

### **10. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **11. Data Subjects’ Rights**

As a data subject, you are entitled to exercise the following rights before Tribal Share, at any time:

- Access your Personal Data being processed by Tribal Share (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data
- Correct or update your Personal Data processed by Tribal Share, where it may be inaccurate or incomplete



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- Request erasure of your Personal Data being processed by Tribal Share, where you feel that the processing is unnecessary or otherwise unlawful
- Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing
- Exercise your right to portability: the right to obtain a copy of your Personal Data provided to Tribal Share, in a structured, readable format, as well as the transmission of that Personal Data to another data controller
- Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent Tribal Share from processing your Personal Data
- Withdraw your consent to processing (for Profiling)

You can object to the processing of your Personal Data for Marketing also by selecting the appropriate link included at the bottom of marketing e-mail messages received.

Aside from the above means, you can also exercise your rights described above by sending a written request to Tribal Share at the following address: [info@TribalSAC.org](mailto:info@TribalSAC.org). In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Website is unlawful.

### **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 may refuse to comply with your request in these or other legitimate circumstances.

### **What We May Need From You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



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### **Time Limit To Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. Finally, we can only act on requests related to the personal information we have collected through our websites. That said, if we cannot process your request, we will explain the reason(s) why. For example, a request might impact the rights of another person or company.

### **12. Amendments**

This Privacy Policy entered into force on December 1, 2022. Tribal Share reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. If Tribal Share makes a change to this policy, that in Tribal Share's sole discretion is material, Tribal Share will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. Tribal Share therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how Tribal Share collects and uses Personal Data.