

Policy: Privacy
 Pertains to: General Public
 Effective Date: June 1st, 2022
 Revised Date: N/A



1. Purpose

To clarify the collection and use of data by Connecticut Harm Reduction Alliance (CTHRA), formerly Greater Hartford Harm Reduction (GHHRC).

2. Policy

CTHRA occasionally collects personally identifiable information (PII) to improve its relationship with individuals, families, and funders interested in its mission.

3. Procedures

The following table explains the types of data we collect and the legal basis by which this data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organization and what we do	Name, email, message	Used to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our activities	Name, email	You have given your active consent.
Making a donation	Name, email, address, payment information	To fulfil your intention of donating money and your expectation of receiving a confirmation message.
Website functionality	Website activity collected through cookies	Stores a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your donation inputs before you have fully completed the process.
Referral to a partnering agency	Name, service contact details	Stores information in our internal database that is exported securely to an external database.
Staff Performance and Evaluation	Name, hire date, evaluation dates	Stores information in human resources files exclusively.
Monitoring	Name, episodic details, relevant PPI data points	Collect and store information for comparison with internal data. Updates may be provided to an external database.

How we use your data

When you supply personal information to us, we follow specific guidelines to ensure that the information you have provided is only used for the purpose for which it was intended, and that the data is kept securely.

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy. For example, we may use your personal information to:

- Reply to inquiries you send to us
- Complete requests for assistance you have made with us
- Handle donations that you initiate
- Where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

When we share your data

We will only pass your data to third parties in the following circumstances:

- › You have provided your explicit consent for us to pass data to a named third party;
- › We use software applications purely for the purposes of processing data on our behalf and we have in place a data processing agreement with those third parties that fulfils our legal obligations in relation to the use of third party data processors;
- › We have limited control over data once we submit it for financial, legal, or federal reporting, and are not responsible for the privacy policies and practices of these third parties
- › We use a payment processor. We are not responsible for the privacy policy and practices of this third party. However further information on their privacy policy can be found on the following link: <https://help.anedot.com/knowledge/data-ownership-and-privacy>
- › We are required by law to share your data.

How long we keep your data

We take the principles of data minimization and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent annually.

Rights you have over your data

You have a range of rights over your data, which include the following:

Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this. There will always be 'unsubscribe' links at the bottom of our marketing emails/newsletters.

You have the right to ask for rectification and/or deletion of your information.

You have the right of access to your information.

You have the right to lodge a complaint with the Office of the Attorney General if you feel your rights have been infringed.

Cookies & usage tracking

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording your donation transactions, and counting the number of people looking at a website.

We describe below what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the site's functionality.

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not unsure whether you need them or not in case they are used to provide a service that you use.

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

The Cookies We Set

Cookies may be used to remember if you have already registered for our email newsletter and signed up for regular news updates to ensure you only get relevant notifications

Cookies are used to ensure that your donation payment is processed properly and that your details are remembered throughout the transaction.

In some special cases we will also use cookies provided by trusted third parties. This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <https://policies.google.com/privacy?hl=en-US>

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter, Instagram, LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.