

## **NATIONAL ASSOCIATION OF WOMEN'S PRISON REFORM, LLC PRIVACY POLICY**

The company ("we or our") - National Association of Women's Prison Reform (NAWPR), a limited liability company (LLC), is committed to protecting your privacy. This privacy policy explains what information we collect, use, share and store about you; and the options and rights that are made available to you. In the case of any question(s) about this policy, feel free to contact us using the contact details that will be provided in this policy.

We abide by and partake in the EU-US Privacy Shield (a framework for regulating the exchange of personal data for commercial purposes between the European Union/European Economic Area and the United States). It also includes the Swiss-US Privacy Shield (a framework supervised by the US Department of Commerce pertaining to the collection, use, and retention of personal information transferred from Switzerland to the United States). You can find out more by clicking on our Privacy Shield in this policy.

### **ABOUT NATIONAL ASSOCIATION OF WOMEN'S PRISON REFORM, LLC**

We are an outsourced call center who handles Personally Identifiable Information (PII). We form partnerships with various organizations across the globe to handle their cold-call. We will also be cold calling out to companies for business-to-business (B2B).

Our services include:

- Providing call center services to people around the world in a variety of industries like customer support, lead generation, sales, back office processing and more.
- Improving business transactions among companies to deliver better sales, providing customized sales solutions for retailers and B2B customers through NAWPR.

### **WHEN DOES THIS POLICY APPLY?**

For the collection, use and declaration of your personal information which directly or indirectly identifies you, this policy may apply through:

- a. Our website(s) and related application(s) and content(s) that link or direct to this policy and the material(s) made available to you
- b. The services we receive from you
- c. Provision of our service to you or connection with any of our advertising and recruitment activities, sales, identification programs and marketing and;

This privacy policy doesn't apply to the practices of third parties that the National Association of Women's Prison Reform, LLC does not own or control.

### **WHAT DOES THIS POLICY ENTAIL?**

By clicking on one of the links below, you will be directed to such section:

*Collection of Personal Information*

*Use of Personal Information*

*Cookies and Online Tracking*

*Sharing Your Personal Information within National Association of Women's Prison Reform*

*Third Parties access to personal information*

*Legalized Basis for Organizing Personal Information (EEA users only)*

*Global Data Transport*

*EU-U.S. and Swiss-U.S. Privacy Shield Framework*

*Your Privacy Rights*

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*Security of Your Personal Information*

*Safekeeping Data*

*Children's Privacy*

*Links to Other Sites and Public Forums*

*Contact information*

*Policy amendment*

*Additional Policy*

*Additional Information That Applies to NAWPR*

### **Collection of Personal Information**

National Association of Women's Prison Reform collects and protects personal information from these categories of individuals:

- **Visitors:** those who visit or use our site or any of our services, so that we can meet their needs by providing them with the site services they require;
- **Workers:** all our staffs working directly or indirectly with us so as to know their background as well as health status
- **Job seekers:** those that apply for job vacancies to fill our internal positions or as part of our staffing and recruiting services;
- **Clients, sellers, service providers, and other suppliers:** employees, representatives and/or customer agents, service providers, sellers, or other suppliers with whom we have a business relationship with or supervise on our clients' behalf;
- **Referees and others:** whose advice is on the satisfactory position given to job seekers.

If you submit any personal information of other people to us or to our service providers in connection with the NAWPR, you confirm that you have the rights to do so and to permit us to use the information in accordance with this policy.

**Types of information we collect:**

- **Information submitted to us:** NAWPR collects personal information that individuals provide to us through our services. These are collected when they visit our sites, post on our forums or blogs, sign up for an account to access specific National Association of Women's Prison Reform services, or when they subscribe to our marketing services, register for an event or webinar, or otherwise contact us. We may also collect personal information from individual offline, e.g. when individuals provide information to us through phone call or text message or in person, at events or at one of our recruitment offices.

**Types of personal information collected:**

- contact information (but not limited to): name, postal address, email address, and telephone number
- username and password on registering on our sites
- professional information (but not limited to): job title, department, or job post
- information you provide about others whom you would like us to contact (like, referrals or references) or information regarding your emergency contacts
- résumé/C.V. information (but not limited to): employment and education history, language proficiencies, security clearance information, and other work-related skills, awards/honors, certification, membership in clubs and organizations, hobbies and information regarding your career interests and other qualifications for, or desires regarding future employment opportunities, including information regarding desired compensation and benefits
- citizenship ; and
- work authorization status.

You will be notified of all information requested from you. Before collection, you will be informed of the personal information being requested whether required by employers as a term of their employment or by law, or needed on a voluntary basis, and the consequences of denying such information.

- **Information we collect automatically:** From visitors to our site, we automatically collect certain technical information (but not limited to): Internet protocol (IP) address of their device, login information, device type and unique identification numbers, browser type and version, time zone setting, browser plug-in types and versions, operating system and platforms. Information about their visits to our site, such as download errors experienced and length of visits to certain pages. When you access the National Association of Women's Prison Reform site, our service providers and we may track and collect certain device-related information (such as your type and device unique ID) to know what information you accessed based on your device ID.
- **Information collected from other sources or third parties:** We may request or acquire information about our visitors, job seekers, workers, customers, and suppliers from third-party partners (such as background check providers) or other third-party sources (such as information from publicly available sites (like Monster.com, CareerBuilder.com, or LinkedIn), or a job seeker's third-party reference.

-You can also provide us with access to certain personal information stored by third parties, like social media sites. Take for instance, if you register for an account to access some of our sites (like the Communities site), you can choose to import your LinkedIn basic profile data (such as your name, experience, location, photo, and contact information). By authorizing the National Association of Women's Prison Reform to have access to this information, in collecting, storing, and using this information, following this privacy policy, National Association of Women's Prison Reform will only pursue the legitimate interests set out below under use of Personal Information.

-We also collect information that is available publicly from job boards or professional social media websites where career data is made available by individuals and can be viewed by recruiters.

**Confidential Information:** Following the various services we provide, or if you are applying for a job opportunity with us or one of our customers, you may be asked for types of personal information that are viewed by some countries as confidential information. It includes, for instance, government-issued identification numbers (such as national insurance numbers, national identification number, etc.), information pertaining to a person's race or ethnic origin, political opinions or religious or philosophical beliefs, physical or mental health/condition, sexual orientation, trade union membership, genetic data and any related legal actions, or the processing of biometric data for the purposes of uniquely identifying an individual. It also includes information about an individual's criminal offences or convictions, as well as any other information deemed sensitive under applicable data protection laws (collectively "Confidential Personal Information").

-Despite the fact that we aim to reduce the amount of Confidential Personal Information that we process, such information may be processed in certain circumstances, such as where we are required to or permitted to do so by law (e.g. information about your racial/ethnic origin, gender, or affirmative action programs) or where necessary, to provide you with a service, or if a criminal background check is required, drug/alcohol test or fitness-for-duty testing. If required by applicable data protection laws, we will obtain your express consent to our collection and use of your confidential personal information.

### **Use of Personal Information**

The National Association of Women's Prison Reform will use the personal information collected only as specified in this policy and/or as we specify at the time of collection. Mostly, the personal information we collect and use is to practically provide and enhance the National Association of Women's Prison Reform services (such as staffing and recruiting service of our site, workforce management or theft identification) and to observe applicable laws and government regulations (such as, to comply with mandatory employment, tax, and insurance requirements).

Expressly, your personal information may be used for the following purposes:

- Providing and administering the National Association of Women's Prison Reform services and for internal operations (e.g. troubleshooting, sales outsourcing, data analysis, statistical, handling personally identifiable information to detect and prevent theft, and business purposes);

- Protecting the National Association of Women's Prison Reform services (e.g. fraud monitoring, and prevention of hackers);
- Feedback to communications;
- Obeying laws and government regulations;
- To fulfill your needs if you are a job seeker;
- To match job seeker to job positions and vice versa;
- Calculating the number of users and usage of the site(s) to plan Site bandwidth, monitor traffic and capacity accordingly;
- Acknowledging you when you return as a repeat visitor to our Site(s)
- Providing information on requested goods and services;
- Providing you e-mails and other promotional communications about the National Association of Women's Prison Reform marketing, advertising, and promotions under your marketing preferences. You can opt-out of receiving e-mails at any time (see "Your Choices" below);
- For business purposes, such as data analysis, audits, fraud monitoring and prevention of hackers, originating new product and services; enhancing, improving or modifying our Sites, products and services, and operating and expanding our business activities; and
- Informing you about changes to our site(s) or services.

Personal information collected online by the National Association of Women's Prison Reform service may also be complemented with information you provide to us through other services we render. As well as other online and offline sources (such as recruitment fairs, social media platforms (like LinkedIn), trade shows, or other events and other data appending methods (such as spot tags, tracking, and cookies as referenced below).

The personal information we receive may be used to create anonymized and aggregated statistics that do not reveal the specific identity of any person.

In most cases, the National Association of Women's Prison Reform will process personal information for a variety of business purposes which are in our legitimate interests (for instance, to operate its business and provide you with services you have requested), in order to enter into or perform a contract with you or for compliance with our legal obligations (as described above). However in some cases, and always where required by applicable law, the National Association of Women's Prison Reform will seek your consent to process your personal information (including any Confidential Personal Information).

### **Cookies and Online Tracking**

The National Association of Women's Prison Reform uses "cookies" and similar technologies (e.g. web bugs, Google analytics) to help customize your online experience and for traffic and tracking purposes.

HotJar is being used on some pages of our specific websites noted below in order to better understand our users' needs and to optimize our job services and content to provide a better user experience.

## **What is Hotjar?**

Hotjar is a new technology service that keeps records of user sessions anonymously and captures information—like what links users are clicking on, or how much time users spend on a page—to help us understand how our users interact with our website. HotJar compiles this information across multiple user sessions and displays it as a visual “heat map” that shows where user interactions occur on a given page. This enables us to see “hot spots” of where users are trying to navigate to and evaluate if our website is serving the needs of our visitors.

## **How does Hotjar work?**

Hotjar uses cookies and other technologies to track and collect data on our website users’ interactions as well as device information such as device’s IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only, and preferred language. HotJar stores this information in an anonymized user profile.

## **Does Hotjar record, capture or store any confidential information or personal data?**

No. Neither Hotjar nor our websites will ever use this information to identify individual users or to match it with further data on an individual user. We will also never place Hotjar on pages that contain forms or other places where users can enter personal data. For more details, please see Hotjar’s privacy policy by clicking on this link.

## **What pages of this website use Hotjar?**

We will only use Hotjar on a small subset of its U.S.-based website where content is most relevant to finding jobs and providing jobseeker services. We use analytics to identify the most-trafficked pages of its site related to finding jobs and uses HotJar on a representative sample of those pages to further improve the user experience.

## **How can I opt out of being tracked by Hotjar?**

You can opt-out of Hotjar to prevent Hotjar from storing data about your usage of our site and use of tracking cookies on other websites by following the opt-out link.

For more information on the types of cookies which are used on the National Association of Women’s Prison Reform website, please see our Cookie policy, which is available on our website.

## **Sharing Your Personal Information within National Association of Women’s Prison Reform**

National Association of Women’s Prison Reform may disclose your personal information to any affiliate within the company for use according to this privacy policy. These affiliates include our subsidiaries, affiliates, and our ultimate holding company.

The sharing of personal information with the National Association of Women’s Prison Reform affiliates may include the combination of the personal information obtained by our company’s sites. Information independently obtained on other National Association of Women’s Prison Reform sites as well as data collected offline into one or more database(s) useable by the National Association of Women’s Prison Reform, including all of its affiliates. Also, this combined information will only be used for the purposes stated within this privacy policy.

## **Third Party Access to Personal Information**

In the following circumstances, the National Association of Women's Prison Reform may share and disclose personal information about you with the following types of third parties:

- **Potential employers or potential clients** – We may share your personal information if you are a job seeker with a client for the purpose of providing the National Association of Women's Prison Reform Services (such as staffing and recruiting services, or search, workforce management, or talent advisory services). As stated above, we may need to disclose specific information about your previous employment. Such as your C.V. and corresponding information permitted by law. The results of any criminal background checks or other specific employee data such SSN/National ID with that client or other service providers or agents acting on our behalf to facilitate and enable the potential placement or employment. Immediately you are employed by a client of the National Association of Women's Prison Reform through our search, workforce management, or outsourcing services, the National Association of Women's Prison Reform client will process such personal information in accordance with its own policies and procedures.
- **Compliance with laws** – We may disclose personal information to a third party where we are legally required to do so in order to respond to or comply with any applicable law, regulation, subpoenas, court orders, legal process, or government requests, including in response to public authorities to meet national security or law enforcement requirements.

**Sellers, consultants, and other service providers** – We may use third-party sellers, consultants, and other service providers to assist us in providing Services, including to support us in areas such as recruiting and reviewing responses to job advertisements, managing résumé/C.V. data, IT platform management or support services, infrastructure and application services, marketing, data analytics, skills and assessments training, occupational health and safety screening, and drug and background screening. In providing

these services on behalf of the National Association of Women's Prison Reform. It may be necessary for us to grant these third parties access to your personal information. In the case of onward transfer of data of individuals residing in the EEA or Switzerland, third parties received under the EU-US Privacy Shield or the Swiss-US Privacy Shield. The National Association of Women's Prison Reform is potentially liable under the Privacy Shield Principles if our agents process your personal information in a manner inconsistent with the Principles unless we prove that we are not responsible for the event giving rise to the damage.

- **Business transfers** – Whether for strategic or other business reasons, as the case may be, the National Association of Women's Prison Reform decides to sell, buy, merge, or otherwise reorganize businesses. Such transaction may involve/in accordance with applicable law, the disclosure of personal information to prospective or actual buyers, or the receipt of it from sellers. It is the duty of the National Association of Women's Prison Reform to find appropriate protection for information in these types of transactions.
- **Fundamental interests and legal rights** – We may collect and share personal information and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the National Association of Women's Prison Reform terms of use, or as otherwise required by law,

including without limitation to meet national security or law enforcement requirements. We may divulge your personal information to third parties while trying to establish or exercise a defend against our legal rights.

- In agreement with you, we may divulge your personal information for other purposes as agreed.

Without your permission, we will never sell, rent or lease your personal information to any external company.

### **Legalized Basis for Organizing Personal Information (EEA users only)**

Being a user from the European Economic Area (EEA), our legal basis for collecting and using the personal information described above will depend on the personal data concerned and the specific context in which we manage it.

Although, we usually collect personal information from you only (i) where your personal information is needed to initiate an agreement with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your permission to do so.

In some cases, we may legally be obliged to collect personal information from you. We might ask you to provide personal information to comply with a legal requirement or to perform a contract with you; we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not and also the possible effect if you do not provide your personal information.

If we gather and use your personal information on our legitimate interests dependency (or those of any third party), this interest will usually be to operate our platform and to communicate with you as necessary to provide our services to you and for our legitimate commercial interest. For instance, when responding to your queries, improving our services, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

You may decide to give your personal information to the NAWPR for a particular position for which you are not successful. In such situation, as you have indicated that you are looking for opportunities beyond your current role, the NAWPR may retain your personal information when there is a vacancy to present you with other opportunities for which your experience may be suitable. If you have concerns about the National Association of Women's Prison Reform retaining this data for these purposes, please give them your contact instead.

For further questions and information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the *Contacting Us* heading below.

### **Global Data Transport**

As an international company, we may send personal information to third parties located in the United States and in other countries that may be outside your country of residence, for storage and processing to provide the NAWPR Services. These countries may not automatically have data protection laws as detailed as those in your state or residence. Also, we will have taken appropriate safeguards to protect your personal information under this policy and applicable law



wherever it is processed. These safeguards include implementing the European Commission Standard Contractual Clauses for transfers of personal information between National Association of Women's Prison Reform and our self-certification to the Privacy Shield Frameworks which is explained in details below. More details on these safeguards can be provided upon request.

### **EU-US and Swiss-US Privacy Shield Framework**

The personal information received from the EEA and Switzerland, National Association of Women's Prison Reform, LLC. and its US controlled subsidiary companies (for a full list of the US controlled subsidiary companies, [click here](#)) have certified their compliance to the EU-US and Swiss-US Privacy Shield Frameworks as set forth by the US Department of Commerce pertaining to the collection, use, and retention of personal information from the EEA and Switzerland sent to the United States in agreement to Privacy Shield. We have warranted that we adhere to the Privacy Shield Principles concerning such data. If there is any disagreement between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall dominate. For further detail about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

The National Association of Women's Prison Reforms is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) with regards to our compliance with the Privacy Shield.

EEA and Swiss individuals have the right to get our endorsement to ascertain if we protect personal information that relate to you. On request, we will provide you with access to the personal information that we hold about you. You may also correct, modify, or cancel the information we hold concerning you. An individual who requests for access to rectify, change, or delete inaccurate data, should complete the following web form [here](#). If you experience any issues with the web form or you prefer to submit your requests to us outside of the preferred method of submission, please contact us. If asked to delete data, we sure would as soon as possible.

Your right to acquire your data may be limited in exceptional circumstances, including (but not limited to), when the burden or expense of providing this access would be disproportionate to the risks of your privacy as the case may be, or when the provision of such access would infringe the rights of persons other than you. If we determine that your access should be limited in a particular instance, we will provide you with an explanation of our determination and respond to any inquiries you may have.

We will provide an individual opt-out/opt-in choice before we share their data with third parties (other than our agents), or before we use it for a purpose (other than which it was originally collected or subsequently authorized). To reduce the use and disclosure of your personal information, please complete the following very brief web form [here](#). If you experience any issues with the web form or you prefer to submit your requests to us outside of the preferred method of submission, please contact us.

You will receive e-mails to the e-mail address you provide through the web form acknowledging your request and updating you on the status of your request. All communications through this

web portal are secure and encrypted. We encourage and appreciate your use of this process as it allows us to track requests in a centralized, safe and efficient system.

To protect your privacy and security, we may take steps to verify your identity. A password and user ID is needed if there is an account associated with your request, or identifying information such as your address or date of birth, before proceeding with your application.

In consent with the Privacy Shield Principles, the National Association of Women's Prison Reform commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States under Privacy Shield. Residents of the EEA or Switzerland who believe that their information has not been processed in compliance with the Privacy Shield Principles may raise their complaints in some ways:

(1) You should first contact us by completing this very brief web form here. Alternatively, use the contact details provided below, and we will respond to your complaint within 45 days of receipt.

**National Association of Women's Prison Reform, LLC**

**2144 Peachtree Rd NW #1120**

**Atlanta GA 30309**

**Jennifer Rogers**

**NAWPR20108@gmail.com**

(2) We have further committed the refer of unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus (BBB). If we do not recognize your complaint or satisfactorily address it, please visit for more information and to file a complaint, <http://www.bbb.org/EU-privacy-shield/for-eu-consumers>. This service is provided free of charge to you.

(3) Under certain conditions, if your Privacy Shield complaint cannot be resolved through the above channels, you may petition us for some remaining claims not addressed by other compensation media.

See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

### **Your Privacy Rights**

#### *What Are Privacy Rights?*

This is a right that enables an individual to make specific requests to an organization as pertaining to the processing of their personal data. These rights are implemented by data protection laws that differ from place to place. In the European Economic Area, your privacy rights include the following (but not limited to):

- (i) To request access to a copy of your personal information;
- (ii) To request rectification or erasure of data held about you;
- (iii) To restrict the processing of your personal information;
- (iv) For data portability;
- (v) Besides, you may also have the right to object to the processing of your personal information.

If we have gathered and processed your personal information with your agreement, then you can withdraw this agreement at any time as this will not affect any processing of your personal

information done before you withdrew your agreement, nor will it affect processing of your personal information done on a legal basis other than agreement.

### ***How to Exercise Your Privacy Rights***

If you would like to exercise your privacy rights, please complete the very brief web form here. Using the web form will provide us with the relevant information we need to evaluate and respond to your request. You will receive emails to the email address you provide through the web form acknowledging your request and updating you on the status of your request. All communications through this web portal are secure and encrypted. We encourage and appreciate your use of this process as it allows us to track requests in a centralized, secure and efficient system.

*To protect your privacy and security, we may take steps to verify your identity, such as a password and user ID if there is an account associated with your request, or identifying information such as your address or date of birth, before proceeding with your request. If you resident in the EEA or Switzerland, we will process any access request you make in accordance with our commitments under the EU-US Privacy Shield or the Swiss-US Privacy Shield.*

*If you experience any issues with the web form or you prefer to submit your requests to us asides the preferred method of submission, please contact*

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**Jennifer Rogers**

**Nawpr2018@gmail.com**

*Please note that if you prefer to submit your request outside of the web form, we will still need to obtain the same relevant information from you in order to process your request, which may result in the process being less prompt. Regardless of how we receive your request, we will abide by all applicable legal requirements for deadlines for responding to your request.*

You have the rights to log your complaint to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

### **Your Choices**

**Marketing Communications:** Where it is under your marketing preferences and applicable data protection laws, we may periodically send you updates via e-mail about promotional opportunities or services we think may interest you, such as jobs in our database that match your selection criteria, newsletters, white papers, surveys and event information.

You can opt-out/unsubscribe from receiving marketing emails from us.

Our sites also give you the opportunity to decide which communications you receive when we request personal information about you.

### **Security of Your Personal Information**

The National Association of Women's Prison Reform is dedicated to protecting the personal information you share with us. The National Association of Women's Prison Reform uses appropriate physical, technical, organizational and administrative security measures to help protect your personal information

from unauthorized or unlawful access, use, or disclosure, and from accidental loss, destruction, or damage.

The National Association of Women's Prison Reform supports online security using secure server technology because, we want your data secured. We use the latest security arrangements and facilities on our sites and through the National Association of Women's Prison Reform services to support data security. Unfortunately, the transmission of information through the internet cannot be guaranteed to be 100% completely secure and we cannot guarantee the safety of your data transferred over the internet.

If there are reasons to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please notify us immediately under the "*Contacting Us*" section below.

### **Safekeeping Data**

We keep personal information collected from you. Where there is a need for an ongoing legal business to do so for instance, to provide you with the service you seek or to comply with applicable legal, tax or accounting requirements.

When we have no ongoing legal business need to process your personal information, we will either delete or anonymize it or, if this is not possible for instance 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.

### **Children's Privacy**

This site is not aimed for use by children less than 13 years of age. The National Association of Women's Prison Reform does not deliberately collect personal information from children under the age of 13. If noticed that we have collected personal information from a child under the age of 13, we will delete that data from our systems.

### **Links to Other Sites and Public Forums**

The National Association of Women's Prison Reform site may contain links to other sites for your convenience and information. If you access those links, automatically you will leave the National Association of Women's Prison Reform Site. We have no authority over those sites or their privacy policy, which may differ from the National Association of Women's Prison Reform policy. We are not responsible for the privacy policy or the content of other websites outside of the National Association of Women's Prison Reform site.

This policy does not cover the personal information collected by these third parties or the one you decide to give them. We now encourage you to review, read and understand the policies of such third parties before submitting your personal information.

The National Association of Women's Prison Reform may make message boards, newsgroups, and public forums available to users on its site. Any information you disclose in these areas becomes public information that may be accessed by third parties. You should be cautioned and be sure you accept those policies before deciding to disclose any personal information to their forums.

### **Contact Information**

For questions on this policy, please contact:

**National Association of Women's Prison Reform, LLC**

**2144 Peachtree Rd NW #1120  
Atlanta GA 30309  
Jennifer Rogers  
nawpr2018@gmail.com**

### **Policy Amendment**

If this policy is amended, we will post a revised policy on our site as well as the updated revision date. If we make significant amendments to our policy, we may also notify you by other means, like sending an e-mail or posting a notice on our home page. A revised post tagged "Effective Date" will appear at the top of the page to indicate the date which the amendment was effected.

### **Additional Policy**

Some National Association of Women's Prison Reform third-party services may have an additional privacy policy on how such websites, products, and services process personal information. For instance, a supplemental Privacy Policy for NAWPR is provided at the bottom of this policy.

At times, the National Association of Women's Prison Reform company acts as a data processor, for example when processing personal information, it receives from one of its customers as part of its staffing and recruiting services, including workforce management or sales outsourcing services. Any time that the National Association of Women's Prison Reform acts as a data processor, it will process personal information according to the contractual obligations it has with the applicable data controller. To the extent that the National Association of Women's Prison Reform receives requests from individuals regarding the processing of their personal information by National Association of Women's Prison Reform, it will refer them to and coordinate with the appropriate data controller.

### **Additional Information That Applies to NAWPR Customers**

NAWPR works closely with a variety of retailer businesses ("**NAWPR Customers**") to help them market and sell products and services to their end customers ("**NAWPR End Customers**").

In connection with the retailer services and solutions that NAWPR provides to NAWPR Customers, NAWPR may collect and process personal information (like contact information, transaction history, marketing preferences, or geographic location information) about NAWPR End Customers on behalf of NAWPR Customers for the following purposes:

- To process direct sales and transactions; and
- For NAWPR Customer's business purposes, such as:
  - Data analysis, audits, fraud monitoring, and prevention;
  - Developing new products, services, and offerings;
  - Enhancing, improving, or modifying NAWPR Customers' merchandising, Sites, products, and/or services;
  - Identifying usage or purchase trends;
  - Determining and evaluating the effectiveness of a NAWPR Customer's engagement with its NAWPR End Customers and related promotional campaigns; and
  - Operating and expanding their business activities.

The NAWPR Customer is the data controller of any personal information about NAWPR End Customers. As such, a NAWPR End Customer who wishes access, or who seeks to correct, amend, or delete inaccurate data should direct his or her query to the relevant NAWPR Customer. NAWPR will assist any NAWPR Customer as necessary to comply with any NAWPR End Customer data subject request.

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