



## PRIVACY POLICY

Joseph H. Firth Youth Center  
108 Fleming Drive, Phillipsburg NJ 08865  
Phone: 908-454-7281  
*Effective Date: April 14, 2023*

Joseph H. Firth Youth Center (“JFYC”, “we”, or “us” or “our”) is aware of our users’ concerns about their privacy when visiting our website and online resources. This privacy policy (this “Policy”) describes our practices regarding the information collected from you or that you may provide via our website at [www.firthyouthcenter.com](http://www.firthyouthcenter.com) (the “Website”), and our practices for collecting, using, maintaining, protecting, and disclosing such information. This Policy also applies to all information that is collected by JFYC from its participants through offline activities, such as when you provide your information on the telephone or in person at JFYC, a state agency, department or office, or in connection with JFYC’s educational, recreational and athletic opportunities (collectively, “Offline Activities”).

To the extent we provide you notice on the Website of different or additional privacy policies or practices (e.g., at the point of our collection), those additional terms shall govern such data collection and use.

### 1. Notices and Questions

If you have any questions about this Policy or practices described in it, or would like to exercise your rights under this Policy, please contact us in the following ways:

- E-mail: [info@firthyouthcenter.com](mailto:info@firthyouthcenter.com)
- Regular Mail: Joseph H. Firth Youth Center, Attention: Executive Director, 108 Fleming Drive, Phillipsburg, NJ 08865
- Phone: (908) 454-7281

Please note that e-mail communications will not necessarily be secure; accordingly, you should not include sensitive information in your e-mail correspondence with us.

### 2. Acceptance of Privacy Policy

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. In addition, please review the Website’s Terms of Service at [www.firthyouthcenter.com/terms/](http://www.firthyouthcenter.com/terms/), which governs your use of the Website. If you do not agree to the Terms of Service or this Policy, you must not access or use the Website.

***By accessing or using the Website, you consent to this Policy and the terms of use and our collection, use and sharing of your information and data, and other activities, as described below.***

### 3. Changes to Privacy Policy

***We may revise and update this Policy from time to time and in our sole discretion, with or without notice. All changes are effective immediately when we post them. Your continued use of the Website following the posting of the revised Privacy Policy means that you accept and agree to the changes. However, without your consent, we will not use previously collected Personal Information in a manner materially different than represented at the time it was collected.***

### 4. What Information Do We Collect and When Do We Collect It?

a. What Information Does JFYC Collect? When you visit our Website or in connection with Offline Activities, we may collect two types of information about you: (i) information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as your first and last name, e-mail address, telephone number, home address, and demographic information (“Personal Information”), and (ii) information related to your activities on the Website that is automatically collected as you interact with the Website (“Usage Information”).

b. Personal Information You Voluntarily Provide. Generally, you can visit the Website without telling us who you are and without giving us any Personal Information. The only way that we collect Personal Information through the Website is if you send us a message, send a donation, or if you otherwise voluntarily provide such information through the Website. We will collect whatever Personal Information you voluntarily provide (e.g., name, phone number, postal address, and/or e-mail address). Likewise, if you send us a message, you will be sending us your name, e-mail address, and any other information, including Personal Information, you choose to include in that communication. You are under no obligation

to provide Personal Information, but if you elect not to provide it, you may be unable to use certain features of the Website or to communicate with us via the Website. If you or your dependents want to participate in our educational, recreational and athletic opportunities, you may be required to provide Personal Information in order to participate.

c. Information We Collect or Store as You Access and Use the Website. In addition to any Personal Information or other information that you choose to submit to us via the Website, we and our third-party service providers may use a variety of technologies that automatically (or passively) store or collect Usage Information. This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, laptop, tablet, mobile phone or other device (each, a “Device”) whenever you visit or interact with the Website. Usage Information typically is anonymous information not associated with you or your identity. However, if Usage Information is combined with your Personal Information in a manner that it is directly associated with your identity, it will be treated as Personal Information under this Policy.

This Usage Information may include:

- your IP address or other unique identifier (“Device Identifier”). A Device Identifier is a number that is automatically assigned to your Device used to access the Website, and our computers identify your Device by its Device Identifier;
- your Device functionality (including browser, operating system, hardware, mobile network information);
- the URL that referred you to the Website;
- the areas within the Website that you visit and your activities there, including remembering you and your preferences;
- your Device location;
- your Device characteristics; and
- certain other Device data, including the time of day, among other information.

d. Tracking Technologies. We may use various developed methods and technologies to store or collect Usage Information (“Tracking Technologies”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. A few of the Tracking Technologies include the following (and subsequent technology and methods later developed):

(i) Cookies and Similar Technologies.

Cookies are small pieces of data stored and managed by your web browser that enable certain Website features and functionality. Cookies and similar technologies can be used to recognize you and your device when you visit the Website, remember your preferences, and make your interactions with the Website faster and more secure. Cookies are a built-in feature of the Web, but they can generally be managed, disabled, or removed using most commercial web browsers. Each browser you use will need to be set separately and different browsers offer different functionality and options for cookies. Please be aware that if you disable or remove cookies on your device, some parts of the Website may not function properly and that when you revisit the Website your ability to limit cookies is subject to your browser settings and limitations. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [allaboutcookies.org](http://allaboutcookies.org) or [aboutcookies.org](http://aboutcookies.org). Note that such limitations, however, are not effective on mobile applications, though many applications allow users to “opt out” of certain advertisements and other features by adjusting their mobile device settings.

The types of cookies that we use on the Website, and the purposes for which they are used, are as follows:

- *Strictly necessary cookies:* These cookies are essential to enable you to move around the Website and use its features, such as accessing secure areas. Without these cookies, any services on the Website you wish to access cannot be provided.
- *Analytical/performance cookies:* These cookies allow us to recognize and count site visitors and to see how visitors move around the Website when they are using them. This helps us to improve the way the Website works, for example, by ensuring that users are finding what they are looking for easily. All information these cookies collect is aggregated and is used only to improve how a website works. In addition, we use third party service providers to provide certain analytics services to use in connection with the operation of the Website. These include Google Analytics, a web analytics service provided by Google, Inc. (“Google”), to track Website usage and activity anonymously. Google Analytics uses cookies, and the information generated by such cookies about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information on our behalf for the purpose of evaluating your use of the Website, compiling reports on website activity and providing to us other services

relating to website activity and internet usage. Google will not associate your IP address with any other data held by Google. You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under: <https://tools.google.com/dlpage/gaoptout?hl=en-GBM>. In addition, further information about Google's terms and conditions for Google Analytics can be found at: <http://www.google.com/analytics/terms/gb.html>.

- **Functionality cookies:** These cookies allow the Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for such as watching a video. Additionally, these cookies can be used to allow an optional service to function. The information these cookies collect may be anonymized and these cookies cannot track your browsing activity on other websites.
- **Targeting cookies.** These cookies record your visit to the Website, the pages you have visited and the links you have followed. We use this information to make the Website more relevant to your interests. We may also share this information with third parties for this purpose.

(ii) **Tracking URLs.** These are used to determine from which referring website the Website is accessed.

(iii) **Social Plugins.** The Website may use social plugins (e.g., the Facebook "Like" button) to enable you to easily share information with others. When you visit the Website, the operator of the social plugin may be able to place a cookie on your computer, enabling that operator to recognize individuals who have previously visited the Website. If you have previously logged into the associated social media website (e.g., Facebook) before browsing on the Website, the social plugin allows that social media website to receive information about your visit to particular pages on the Website. The social plugin may collect this information for any such visitors who have logged into social networks, whether or not they specifically interact with the plugin on the Website (e.g., by clicking "Like" or "Share"). The social plugin may also allow the social media website to share information about your activities on the Website with other users of their social media website. For further details about the information shared via a particular social media plugin, you should refer to that social media site's privacy statement.

e. **Third Party Service Providers.** Third party service providers may use such technologies with the Website and may collect information about you, including Personal Information, without notice to you. ***By using the Website, you consent to potentially encountering third party tracking technologies when using the Website and accept that our statements in this Privacy Policy do not apply to the tracking technologies or practices of such third parties.*** We are not responsible for any such third party technologies or activities arising out of them. We are not responsible for the effectiveness of or compliance with any third party's opt-out options.

## **5. How Do We Use the Information Collected?**

We may use your Personal Information and/or Usage Information:

- to provide you with information about educational, recreational and athletic programs/opportunities, services, changes to the Website and/or our policies, and other information you may request;
- to complete and fulfill requests for services;
- to respond to your inquiries and personalize your experience in your registered programs/opportunities or on the Website (your information helps us to better respond to your individual needs);
- in connection with your charitable donations;
- to improve the Website (we continually strive to improve the Website based on the information and feedback we receive from you);
- for internal business purposes;
- to contact you in connection with your use of the Website our our programs/opportunities;
- in connection with enforcement of our rights and to comply with applicable law; and
- for purposes disclosed at the time you provide your information or as otherwise set forth in this Policy.

In addition, Usage Information we collect may be used for a number of purposes, such as system administration, to help us understand the demographics of visitors to the Website, to enhance the performance and usefulness of the Website, and to audit use of the Website.

However, in no event will we sell or rent your Personal Information to anyone.

## **6. How and When Do We Disclose Information to Third Parties?**

a. General. We may share Personal Information and Usage Information with third parties. We may share your Device Identifiers with third parties along with data related to you and your activities. We do not share your Personal Information that we have collected directly from you on the Website with third parties for those third parties' marketing purposes unless you consent to such sharing at the time you provide your Personal Information. In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described below or otherwise in this Policy.

b. Executive Branch. To better provide you with services and to provide a consistent experience across state agencies and departments, we may, in accordance with applicable laws and regulations, share your information with such agencies and departments.

c. Third Parties Providing Services on Our Behalf. We may share Personal Information with third parties who perform services on our behalf. This includes third parties that: host the Website; operate certain functions or features of the Website; archive data; send communications; analyze data; and provide other services or functions on our behalf, including credit card processing, order fulfillment, business analytics, customer service, marketing, employment or hiring-related activities, data security functions, and fraud prevention. We may provide these vendors with access to user information, including Device Identifiers and Personal Information, to carry out the services they are performing for you or for us. Third party analytics service providers may set and access their own Tracking Technologies on your Device and they may otherwise collect or have access to information about you, potentially including Personal Information, about you. We are not responsible for those third party technologies or activities arising out of them. We are not responsible for the effectiveness of or compliance with any third parties opt-out options.

d. Administrative and Legal Reasons. We may also disclose and transfer Personal Information to third parties: (i) in the event we are required to do so to satisfy an applicable law or regulation, to respond to a court order, subpoena, discovery request, or other legal process, or if in our good faith opinion such disclosure is required by law; (ii) at the request of governmental authorities conducting an audit, investigation or other inquiry; (iii) to verify or enforce compliance with other agreements or policies governing the Website, or applicable laws, rules, and regulations; or (iv) whenever we believe disclosure is necessary to limit our legal liability or to protect or enforce the rights, interests, or safety of our firm, clients or the Website, its users or other third parties.

e. Sharing of Non-Personal Information. We may also share non-personally identifiable information, such as Website Usage Information, aggregated user statistics, and anonymous information derived from Personal Information (e.g., de-identified user information), with third parties for any purpose.

## **7. Certain Privacy Rights**

a. California Privacy Rights. Under California's "Shine the Light" law (California Civil Code Section 1798.83), California residents have the right to receive information about third parties with whom we have shared information about you for their marketing purposes during the previous calendar year and a description of the categories of Personal Information shared. To make such a request, please contact us [here](#), with "Request for California Privacy Information" in the subject line or written request. Requests may be made only once a year and are free of charge.

b. Consent to Transfer Information to the United States. The Website is operated in the United States. By providing us with any information or materials via the Website, you consent to the transfer and processing of your information and materials in the United States. If you are located outside of the United States, please be aware that information we collect, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States.

c. Do Not Track Signals. Some web browsers may transmit "do not track" signals. At this time, we do not take steps to respond to such signals. You can manage your cookie preferences using your own browser settings to accept or block some or all cookies, or to receive notice so you can consent to cookies. If you block all cookies, some features of the Website may be unavailable to you.

d. Children. We are especially concerned about protecting children's privacy. To provide the services we offer, we sometimes need to collect certain information about children in both online and offline contexts. If we ask for Personal Information from children under 13 in connection with our online services, where required we will comply with the

Children’s Online Privacy Protection Act (COPPA), including taking additional steps to protect the privacy of such information, including:

- obtaining verifiable consent from the parent or legal guardian of the child before collecting or using the child’s Personal Information;
- notifying parents about what Personal Information is being requested and how that Personal Information will be used and/or shared, such as through this policy;
- limiting the online collection of Personal Information from children to no more than is reasonably necessary to accomplish the purpose of the collection;
- giving parents a description of and access to the Personal Information we have collected from their children;
- offering them the opportunity to request that such Personal Information be changed or deleted;
- offering them an opportunity to prevent any further use or collection of information about their children; and
- maintaining reasonable procedures to ensure the confidentiality, security and integrity of the personal information collected.

We may also need to collect certain information about children and minors in an offline context, such as when:

- a parent or legal guardian of a minor signs up for a program/opportunity in person or over the phone; and
- minors visit our facilities, where we may collect information about them to be able to contact their parent or legal guardian to notify them of an injury or other issues involving the minor.

#### **8. Do Third Party Content and Links to Third Party Sites Appear on the Website?**

The Website may contain content that is supplied by a third party (such as government agencies, nonprofit organizations and private businesses), and those third parties may collect Usage Information and your Device Identifier when pages from the Website are served to you. In addition, when you are on the Website you may be directed to other sites that are operated and controlled by third parties that we do not control. We are not responsible for the data collection and privacy practices employed by any of these third parties or their sites and they may be tracking you across multiple sites and may be sharing the results of that tracking with us and/or others. For example, if you “click” on a link, the “click” may take you off the Website onto a different site. These other sites may associate their Tracking Technologies with you, independently collect data about you, including Personal Information, and may or may not have their own published privacy policies. We encourage you to note when you leave the Website and to review the third party privacy policies of all third party locations and exercise caution in connection with them.

#### **9. Video Surveillance**

In our facilities we may use a self-contained surveillance system comprised of cameras, recorders, and displays for monitoring activities (“CCTV”). The purpose of CCTV monitoring is for Safety and Security Purposes (as defined below). Any interception, duplication, transmission, or other diversion of video and CCTV technologies for purposes other than Safety and Security Purposes is prohibited. Any use of CCTV by us shall conform to state and federal laws, this Policy, and shall be managed in an ethical manner.

Safety and Security Purposes include:

- Protection of individuals, including participants, students, faculty, staff, and visitors;
- Protection of JFYC owned and/or operated property and buildings, including building perimeters, entrances and exits, lobbies and corridors, receiving docks, and storage areas.
- Monitoring of common areas and areas accessible to the public, including transit stops, parking lots, public streets, and pedestrian walks;
- Investigation of criminal activity;
- Authorized JFYC administrative investigations;
- Situational awareness during emergency operations;
- Protection against an act of terrorism or related criminal activity; and
- Protection of critical infrastructure.

#### **10. How Do I Change My Information and Communications Preferences?**

You are responsible for maintaining the accuracy of the information you submit to us. The Website may allow you to review, modify, correct or update Personal Information you have provided through the Website or through Offline

Activities. Otherwise, you may contact us [here](#) to review, modify, correct or update Personal Information you have provided to us or to ask that we remove your name, contact information, and email address from the lists we use to send our mailings and contact you. We will make good faith efforts to make any requested changes or removals in our then active databases as soon as reasonably practicable. Further note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. When you edit your Personal Information, information that you remove may persist internally for our administrative purposes. Note that if you request us to delete or remove any data, you may be unable to use certain features of the Website or to communicate with us via the Website. Further, we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

You may cancel or modify our e-mail marketing communications you receive from us by following the instructions contained within our promotional e-mails or by notifying us to request a change in email preferences. If your opt-out is limited to certain types of emails, the opt-out will be so limited. If you subscribe to text messages from us, you can terminate a particular text message subscription by reply texting "STOP." Subsequent or different subscriptions will be unaffected by an opt-out. Please note that we reserve the right to send you certain communications relating to your account or use of our Sites, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt-out from receiving our marketing communications.

For any information provided to third parties, you must contact the third party directly to review, modify, correct, update, remove or delete any such information.

### **11. How Long Will We Retain Your Personal Information?**

We will retain your Personal Information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this Policy, subsequently authorized by you, or as required under applicable law. After such time periods have expired, we may either delete your Personal Information or retain it in a form such that it does not identify you personally.

### **12. What About Security?**

We take very seriously the security and privacy of Personal Information that we collect pursuant to this Policy. We incorporate commercially reasonable and appropriate safeguards to help protect and secure your Personal Information from loss, misuse and unauthorized access, disclosure and alteration, taking into consideration the risks involved in the processing and nature of such information. We will also comply with all applicable laws and regulations. However, no data transmission over the Internet, mobile networks, wireless transmission, or electronic storage of information can be guaranteed to be completely secure. Please consider this prior to submitting Personal Information to us via the Website.

### **13. Do You Need Extra Help?**

JFYC is committed to making our website's content accessible and user friendly to everyone. If you are having difficulty viewing or navigating the content on this website, or notice any content, feature, or functionality that you believe is not fully accessible to people with disabilities, please call 908-454-7281 or email our team at [info@firthyouthcenter.com](mailto:info@firthyouthcenter.com) with "Disabled Access" in the subject line and provide a description of the specific feature you feel is not fully accessible or a suggestion for improvement.

We take your feedback seriously and will consider it as we evaluate ways to accommodate all of our customers and our overall accessibility policies. Additionally, while we do not control such vendors, we strongly encourage vendors of third-party digital content to provide content that is accessible and user friendly.

*© Joseph H. Firth Youth Center 2023. All Rights Reserved.*