

Donor Data Privacy Policy

Friends of Talem is committed to protecting the privacy and personal data of all Donors and website visitors. This Policy governs the collection, processing, use, disclosure, retention, and deletion of Donor Personal Data by Friends of Talem, in compliance with the California Consumer Privacy Act (CCPA/CPRA), the EU General Data Protection Regulation (GDPR), applicable federal privacy and data protection law, and prevailing best practices in nonprofit data stewardship. This Policy applies to all Personal Data collected through the Talem Foundation website, Friends of Talem donation pages, email communications, and any other medium through which Donors interact with the Organization.

Friends of Talem may collect the following categories of Donor Personal Data in connection with the operation of the Charitable Fundraising Platform (CFP) and the Organization's charitable activities:

- Identification Data: Full legal name, email address, mailing address, and telephone number;
- Payment Data: Credit card, debit card, or bank account information, processed exclusively through a PCI-DSS compliant payment processor. Friends of Talem does not store, transmit, or process full payment card numbers internally;
- Donation Data: Donation amounts, dates, designated purposes, restricted gift designations, and complete transaction history;
- Communications Data: All correspondence, inquiries, and communications between Donors and Friends of Talem;
- Technical Data: IP addresses, browser type and version, device identifiers, operating system information, and website usage data collected via cookies, web beacons, and analytics tools;
- Consent Records: For Donors located in the European Economic Area or otherwise subject to GDPR, records of all consents obtained for processing Personal Data.

Legal Basis for Processing (GDPR)

For Donors located in the European Economic Area, the United Kingdom, or Switzerland, Friends of Talem processes Personal Data on the following lawful bases under GDPR Article 6:

- Contractual Necessity (Article 6(1)(b)): Processing required to complete and fulfill a charitable donation transaction at the Donor's request;
- Legal Obligation (Article 6(1)(c)): Processing required to comply with applicable legal requirements, including AML regulations, sanctions screening requirements, IRS reporting obligations, and tax receipt issuance;

- Legitimate Interests (Article 6(1)(f)): Processing necessary for legitimate interests pursued by Friends of Talem, including improving Platform functionality, preventing fraud, and ensuring platform security, where such interests are not overridden by the interests or fundamental rights of the data subject;
- Consent (Article 6(1)(a)): For marketing communications, newsletters, and non-transactional communications, processing is based solely on the Donor's freely given, specific, informed, and unambiguous explicit opt-in consent.

Donor Personal Data shall be used by Friends of Talem only for the following specified, explicit, and legitimate purposes:

- Processing, recording, and acknowledging charitable donations;
- Issuing tax receipts, contemporaneous written acknowledgments, and other required charitable gift documentation;
- Communicating with Donors regarding their donations, refund requests, or other Donor inquiries;
- Complying with all legal, regulatory, and reporting obligations applicable to the Organization;
- Conducting fraud prevention, AML screening, and Platform security operations;
- With the Donor's explicit prior consent: sending newsletters, program updates, impact reports, and fundraising communications.

Friends of Talem shall not sell, rent, trade, or otherwise transfer Donor Personal Data to third parties for commercial purposes. Donor Personal Data may be disclosed only in the following limited circumstances:

- To payment processors and financial institutions, solely for the purpose of processing donations, subject to written data processing agreements meeting applicable legal requirements;
- To government authorities, law enforcement agencies, or regulatory bodies, as required or permitted by applicable law;
- To Foreign NGOs: only the aggregate amount and designated purpose of donations received on a Foreign NGO's behalf shall be shared. No Donor identifying information shall be shared with a Foreign NGO without the Donor's explicit prior written consent.

Donor Rights (CCPA and GDPR)

Subject to applicable law, Donors have the following rights regarding their Personal Data held by Friends of Talem:

- Right to Access: Request a copy of the Personal Data held by the Organization;

- Right to Correction: Request correction or rectification of inaccurate or incomplete Personal Data;
- Right to Deletion: Request deletion of Personal Data, subject to the Organization's legal retention obligations;
- Right to Opt-Out: Opt out of marketing communications at any time without penalty;
- Right to Data Portability (GDPR): Receive Personal Data in a structured, commonly used, machine-readable format;
- Right to Object (GDPR): Object to processing of Personal Data based on legitimate interests;
- Right to Withdraw Consent: Withdraw consent for marketing communications at any time, without affecting the lawfulness of prior processing.

Donor rights requests shall be submitted in writing to [talemfoundation@gmail.com]. Requests shall be acknowledged in writing within thirty (30) days of receipt and fulfilled within forty-five (45) days. For complex or voluminous requests, the fulfillment period may be extended to ninety (90) days with written notice to the Donor of the extension and the reason therefore, as permitted by applicable law.

The Talem Foundation website uses cookies and similar tracking technologies for purposes of website functionality, analytics, and (with consent) marketing. A Cookie Consent Banner shall be displayed to all website visitors upon their first visit to the website, providing clear, plain-language information about the types and purposes of cookies used and enabling visitors to accept or decline non-essential cookies. A full Cookie Policy shall be published on the website and shall be updated as necessary to reflect changes in applicable law or the Organization's use of tracking technologies.

Friends of Talem does not knowingly collect, process, or retain Personal Data from children under the age of thirteen (13). If the Organization becomes aware that it has inadvertently collected Personal Data from a child under age thirteen, such data shall be promptly deleted. The donation pages are not directed to minors and include appropriate age-affirmation language.

Donor Personal Data shall be retained only for the period necessary to fulfill the purposes described in this Article and to comply with applicable legal retention requirements. Minimum retention periods are as follows:

Data Category	Retention Period
Donation records and gift acknowledgments	Seven (7) years from date of donation
Payment data	As required by PCI DSS and applicable law

Marketing consent records	Three (3) years from last communication
Donor rights request records	Three (3) years from fulfillment
All other Personal Data	Seven (7) years, or as required by applicable law, whichever is longer

A Donor Privacy Policy, written in plain, accessible language and summarizing the key provisions of this Policy, shall be published prominently on the Talem Foundation website. The Privacy Policy shall be linked from all donation pages, the website footer, and all marketing communications. The Privacy Policy shall be reviewed and updated at least annually and whenever material changes occur to the Organization's data practices.