

Privacy Policy

This Policy was updated on January 14, 2022

This Privacy Policy (“Policy”) describes how Washburn & McGoldrick, LLC (“Washburn & McGoldrick”) collects, uses, discloses, and protects the personal data we are holding about clients, client employees, agents electronically or otherwise and client-affiliated alumni, parents, and friends. This Policy applies to all clients and recipients of information provided by Washburn & McGoldrick.

Definitions

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as "We", "Us" or "Our" in this Policy) refers to Washburn & McGoldrick, LLC, 24 N. Bryn Mawr Avenue, #252, Bryn Mawr, PA 19010.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to: Pennsylvania, United States
- **Device** means any device that can access the web such as a computer, a cell phone, or a digital tablet.
- **Personal Data** refers to any information that relates to an identified or identifiable individual.
- **Service Provider** means any natural or legal person who processes the data on behalf of Washburn & McGoldrick. It refers to third-party companies or individuals employed by Washburn & McGoldrick to facilitate the website, delivery of products and/or services on behalf of Washburn & McGoldrick or to assist the Washburn & McGoldrick in analyzing how the website and other platforms are used.
- **Usage Data** refers to data collected automatically, either generated using our website or from the infrastructure itself (for example, the duration of a page visit).
- **Website** refers to the Washburn & McGoldrick, LLC company website accessible at <https://www.wash-mcg.com>.
- **You** means the individual accessing or using the website, or the company, or other legal entity on behalf of which such individual is accessing or using the website or other business platforms, as applicable.

Collection and Use of Information

Personal Data

As the controller of your personal data, we control how all information we are holding about you is stored, processed, or transferred. We will only deal with your information in accordance with the terms of this Policy.

We collect personal data submitted voluntarily by you or that we otherwise learn through our interactions with you. This includes information that can be used to contact or identify or communicate with You in connection with our legitimate business interests and may include, but is not limited to:

- First name and last name
- Email address
- Phone number
- Address, State, Province, ZIP/Postal code, City

We continuously review our records to ensure your data are as accurate as possible and may therefore consult alternative sources to do so such as newspaper articles, company websites, and other publicly available sources. Washburn & McGoldrick collects and uses information that it believes to be factually correct, relevant to our work, and not overly excessive. We are always respectful of our constituents regarding the information that is retained.

Washburn & McGoldrick may use Personal Data for the following purposes:

- To provide and maintain our website and additional business platforms to monitor the usage of our website and services.
- To contact You by email, telephone, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news and general information about other services and events unless You have opted not to receive such information.
- To manage Your requests to Us.
- For other purposes such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our website, products, services, marketing, and the user experience.

Usage Data

Usage Data are collected automatically when using the Washburn & McGoldrick website and other business-related platforms. Usage Data may include information such as Your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our

website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access our website and other platforms used by Washburn & McGoldrick to conduct business using a mobile device, Washburn & McGoldrick may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

Like most websites, we also use cookies to give you the best browsing experience possible. In general, cookies do not contain any personal data unless you as a visitor knowingly supply the information. If you block the use of cookies, you may not be able to take full advantage of the site's features. By using our site, you agree to the use of cookies.

Disclosure of Information to Third Parties

Washburn & McGoldrick generally does not collect, use, or disclose personal data to any third party. In the event your personal data are to be disclosed to a third party or used for a purpose that is materially different from the purpose we originally collected it for or that you consented to, we first offer you the choice to opt out of such collection, use, or disclosure.

Washburn & McGoldrick will take all steps reasonably necessary to ensure that Your data are treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Washburn & McGoldrick may share your data:

- If we notify you and you consent to the sharing.
- In the event of any merger, sale of Washburn & McGoldrick assets, consolidation or restructuring, financing, or acquisition of all or a portion of Washburn & McGoldrick's business by or into another company.
- To protect our interests, rights, and property in the event of a claim or dispute brought against us.
- If we are required by applicable law, regulation, operating agreement, legal process, or in response to valid requests by law enforcement officials, governmental agencies, or other public authorities, including to meet national security requirements.

Security of Information

Your information, including Personal Data, is processed at Washburn & McGoldrick's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

Washburn & McGoldrick will do its utmost to protect your privacy. Data protection legislation obliges us to follow security procedures regarding the storage and disclosure of information to avoid unauthorized loss or access. We have implemented industry-standard security systems and procedures to protect personal information from unauthorized access, disclosure, alteration, misuse, or destruction.

Statement on Data Protection for Surveys

Washburn & McGoldrick takes the confidentiality of the individual data as both an ethical obligation and a best practice. As such we follow the guidelines spelled out in the U.S. Federal Code (Title 34, Part 97, Protection of Human Subjects) and the EU's General Data Protection Regulation (GDPR). All individuals whom we include in any study are informed at the beginning of a survey of its purpose and given the opportunity not to participate. They are assured their responses and any additional data will be kept confidential. This extends to both quantitative and qualitative data. Individuals can also stop their participation at any time or amend their responses at a later date. Anyone who opts out of a study is immediately removed from any further analysis.

Washburn & McGoldrick has conducted multiple large-scale surveys of alumni/ae and donors using the Survey Monkey platform¹. Allowing Washburn & McGoldrick to send the survey requires us to have access to email addresses for all potential recipients. Our practice has been to use one file with only email addresses and a second file with any pertinent demographic and giving data. In order to link these data, both files should have an identifier created by the client institution's alumni/donor database or CRM, or other random identifier used by our client institutions. These files should be made accessible to Washburn & McGoldrick using encryption. Previous clients have given us access to a college or university "box" that is password protected and contains only the needed data files. Washburn & McGoldrick also has the capacity to create a secure "box" into which a client can upload any files. If a client institution prefers to send out the survey, we will work with your staff to link the survey responses to any needed demographic or giving data to analyze the results.

Once all data are received, a random identifier will be created by Washburn & McGoldrick, and the files used for analysis will be scrubbed of names, emails, and any other information that can reveal individual identities. These files will be further protected with a password (double entry) and encryption. In all reports, data are aggregated into groups to mask individual responses. These aggregated groups do not have fewer than five individuals as per the research guidelines used by College and University Professional Association for Human Resources (CUPA-HR). We will maintain a "crosswalk" between our unique identifiers and the client institution's random identifier until the end of our consulting contract with the client, at which time it will be electronically shredded and destroyed.

¹ Survey Monkey's data security statement is available at <https://www.surveymonkey.com/mp/legal/security/>

Further Information

Washburn & McGoldrick's communications are conducted by phone, email, and mail. If you prefer not to receive some or any of our communications, you can opt out by contacting us by email, phone, or in writing.

Access or Corrections to Information

Washburn & McGoldrick may retain your personal information if necessary for Washburn & McGoldrick's legitimate business interests or to comply with any legal requirement. We will make reasonable efforts to ensure that the information is accurate and complete, and we will update or correct your information as needed when notified by you.

You may have the right to access the personal information we hold about you. In some cases, however, access rights may not apply, including when providing access is unreasonably burdensome or expensive under the circumstances.

To request access to, correction of, amendment to, anonymization of, or erasure of your information, please contact us directly using the contact information provided below.

Changes to our Privacy Policy

We keep our Policy under regular review. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

Washburn & McGoldrick, LLC
24 N. Bryn Mawr Avenue, # 252
Bryn Mawr, PA 19010
info@wash-mcg.com
(518) 783-1949

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