

## **Privacy Policy**

This is the official Privacy Policy for the Upwell Turtles website. At Upwell Turtles, we are committed to safeguarding the privacy of our website visitors. In this Privacy Policy, we explain how we will treat your personal information. This Privacy Policy applies only to information gathered through our website and does not necessarily reflect our practices with respect to information we gather through other means.

This Privacy Policy is part of the terms and conditions which are set forth in our Terms and Conditions. By using this site, you agree to and accept the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our site. We reserve the right to modify or amend the terms of our Privacy Policy from time to time without notice. If we make any such changes, we will notify you by posting the revised policy on this website. We encourage you to periodically review this website to inform yourself of any changes. If you continue to use our site after we post changes to this Privacy Policy, it will mean that you agree to and accept those changes.

### **Collection and Use of Personally Identifiable Information**

Upwell Turtles has a firm commitment to Internet privacy. When you visit our website, we collect two different kinds of information: non-personal information and personal information that you choose to supply us.

#### ***Non-Personal Information***

You can visit most portions of our website without telling us who you are and without revealing any personal information. The only information we collect from your visit, if you do not voluntarily supply us with personal information, is your IP address, the name of your internet service provider, the browser and type of operating system and machine you are using, the web site that may have referred you to us, the pages you request and the date and time you request them. An IP address is a number used by computers on the network to identify your computer so that data can be transmitted to you. We collect and use this information to generate statistics and measure site activity so that we can improve the usefulness of our website to our visitors and enhance your experience on our website.

Also, we use “cookies” to collect information about your visit to our website and to manage information about your preferences. A cookie is a small encrypted computer code added to a file on your computer as a record of its visit. It does not collect or provide your name or any other personal information about you. It can, however, be used by our website to note information about your visit to better tailor the site for you. It can also be used to recognize you when you return as a repeat visitor to our website. We use cookies, for example, to monitor the times when visitors access the website, to estimate the audience size of the website and to track visitor preferences. Cookies do not allow the website to access personally identifiable information that you have not otherwise provided to us. You can control what cookies are accepted by your computer through the settings on your web browser or by deleting them from your computer. Because we use this information only for internal and analytic purposes, your selection of the “Do Not Track” option provided by your browser will not have any effect on our collection of cookie information for these purposes. The only way to opt out of the collection of any information through cookies or other tracking technologies is to actively manage the settings on your browser.

## ***Personally Identifiable Information***

Upwell Turtles may collect email addresses and other personally identifiable information about visitors when such information is voluntarily submitted to us. For example, some of the activist functions, promotions, action networks, surveys and contests referenced on our site require registration or disclosure of personal information. If you want to make a donation to Upwell Turtles, we will also ask personally identifiable information about you. This personal information that we collect is provided only voluntarily by you, and if you do not want to provide such personal information, you should refrain from engaging in those activist functions, promotions, action networks, surveys, contests, donations or other activities that require the disclosure of personal information.

We use personally identifiable information collected from visitors for several important purposes including: making our activities, such as the action network, promotions, and activist functions more effective, to allow us to receive donations and to conduct certain promotions and contests, to help us fulfill visitor requests, to provide you with additional information about conservation issues, to notify you about events of which you may be interested, to protect the security of visitors to our website, to help prevent fraud, to provide you with a website of an enhanced value to you, and to improve our website.

We may have third parties perform certain services on our behalf, such as data processing, marketing, analytics, credit card processing including processing of donations, shipping or stocking orders, and providing customer service, advocacy and outreach programs. These third parties have access to your personal information only as needed to perform their services for Upwell Turtles and are contractually obligated to maintain the confidentiality and security of the personal information.

We may sometimes partner with other advocacy organizations. When we do, if appropriate, we will present you with the option to share your email and personal information with the partner organization and to opt-in to their program.

You acknowledge and agree that we may disclose your personal information if required to do so by law, if you give your consent, or if we have a good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or this website; (b) protect and defend our rights or property, this website, or our users, (c) enable us to provide services or to conduct legitimate business activities related to this website and (d) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, website users, or the public.

We use industry accepted data collection and encryption methodologies in an attempt to ensure the secure collection and transmission of sensitive user information. While we try our best to safeguard your personal information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. Accordingly, although we follow commercially reasonable practices to securely store the information we collect, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use or disclose such information.

We do not sell or otherwise disclose your personal information outside the organization without your explicit permission. However, if you sign up to receive newsletters, make donations, or participate in our promotions or contests, some information, such as your name and mailing address, may be exchanged with other organizations. You can opt out of having your information exchanged by following the Opt-Out Procedures, below.

Our website may provide links to third party websites that are neither owned nor operated by Upwell Turtles. We do not control those websites or how they use or may disclose your personally identifiable information. In the event you follow a link and leave our website, you will be subject to the privacy policy and terms of use agreement of that website owner and operator, and the information you disclose on that other website and to that owner and operator will not be subject to our control or the terms of this Privacy Policy. We are not responsible for the collection, use or disclosure of information you provide on that other website and, by supplying a link to another website, we are not endorsing the content of that website, its products or its services.

This website is not directed to children under the age of 13. We do not knowingly collect personally identifiable information from children under the age of 13. If we become aware that we have received personally identifiable information from a child under the age of 13, we will delete the information from our records.

### **Notice to Visitors from Outside the United States**

This website is published in the United States. By visiting this website and by providing personally identifiable information, you agree that we may collect, use, and disclose your personally identifiable information as described in this Privacy Policy including by transferring such information from the country where you live to the United States.

### **"Remember me" feature:**

On some of our forms, we may offer an optional "remember me" feature that can recall your information for greater ease on subsequent visits to the site.

### **Your California Privacy Rights**

Residents of the State of California have the right to request a list of all third parties to which a company conducting business in California has disclosed personal information during the preceding year for direct marketing purposes. Such requests must be submitted to us at the address listed below. Alternatively, the law provides that if the company has a privacy policy that gives either an Opt-out or Opt-in choice for use of your personal information by third parties for marketing purposes, the company may instead provide you with information on how to exercise this choice.

Upwell Turtles qualifies for this alternative option; it has a comprehensive privacy policy and provides you with details on how you may either Opt-out or Opt-in to the use of your personal information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of the third parties that received your personal information for marketing purposes during the preceding year.

### **Opt-Out and Correction Procedures**

Upwell Turtles provides you with the opportunity to opt out of having your personally identifiable information exchanged with other organizations for direct marketing purposes or used for certain other purposes. To opt out, to correct your personally identifying information, or to unsubscribe from Upwell Turtles publications, send us email or postal mail as follows:

Email to: [turtles@upwell.org](mailto:turtles@upwell.org)

Send postal mail to:  
Upwell Turtles  
99 Pacific Street, Suite 375-E  
Monterey, CA 93940

In your letter or email, make sure to give us your:

- Full Name
- Mailing address (including City, State and Zip Code) and email address
- Indication that you do not wish to have your personally identifiable information exchanged with other organizations and/or other instructions that you may have.

Upwell Turtles may contact you by email to communicate advocacy and educational messages and other information that may be of interest to users of this website. There are several ways in which you can opt-out of receiving such future email communications from us:

1. We provide you with the opportunity to opt-out at the point at which we request information from you, such as when you take certain action through our website;
2. When you subscribe to a newsletter or other publication sent to you by email, you can update your subscription preferences through a link at the bottom of the email; and
3. You also have an opportunity to opt-out of receiving future email communications from us by following the "unsubscribe" or "remove" instructions contained in emails we send you.

We may continue to contact you via email for administrative or informational purposes, including follow-up messages regarding contests or promotions you have entered or other transactions you have undertaken such as donations.

### **California Do Not Track Notice**

Upwell Turtles does not track its website visitors over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked.

Third parties that have content embedded on our websites such as a social feature may set cookies on a website visitor's browser and/or obtain information about the fact that a browser visited a specific website from a certain IP address. Third parties cannot collect any other personally identifiable information from our website unless you provide it to them directly.

### **Complaint Procedure**

If you suspect that we have handled your personally identifiable information in a manner that does not comply with the Privacy Policy, please contact us by e-mailing an explanation to [turtles@upwell.org](mailto:turtles@upwell.org).

**Effective Date:** July 1, 2018