

Privacy Policy for Capitol Hill Village
Version 1.1
September 6, 2007

SUMMARY

Capitol Hill Village recognizes and respects the privacy interests of its members, volunteers, donors, and others covered by this privacy policy. This policy reflects our core principles of respect for privacy and limited disclosure of personal information. We collect information only by lawful and fair means. When appropriate, we collect personal information directly from the data subject or with the knowledge or consent of the data subject. We do not sell, rent, exchange, or share with third parties personal information about members, volunteers, or donors for use in marketing or solicitations of any kind. We use and disclose information only as described in this policy. We provide access and correction rights. We maintain reasonable measures and safeguards to protect personal information.

INTRODUCTION

This privacy policy covers the main personal data processing activities of Capitol Hill Village, a non-profit organization created to provide support for residents of the Capitol Hill community who become members of Capitol Hill Village because they wish to stay in their homes as they grow older.

The goal of this policy is to implement a version of Fair Information Practices (FIPs) for personal information collected, maintained, used, and disclosed by Capitol Hill Village. FIPs are a set of internationally recognized principles that address the privacy of information about individuals. FIPs are important because its principles are at the core of many laws and policies addressing privacy and data protection matters. You can find a basic statement of FIPs at <http://bobgellman.com/rg-docs/rg-fips.pdf>. The Board of Directors of Capitol Hill Village has determined that the version of FIPs reflected in this privacy policy is appropriate to protect the privacy interests of those covered by this policy.

This policy is long and complex because Capitol Hill Village has relationships with different categories of individuals, including members, members' siblings and designated surrogates, volunteers, contributors and donors, vendors and other third-parties, and website visitors. This policy seeks to provide reasonable specificity about each of those relationships.

OPENNESS

This privacy policy describes the processing of most personal data by Capitol Hill Village. Because of the complexity of our operations, the policy is not completely comprehensive at this time for all personal information we process. However, this policy covers personal information about the major classes of our data subjects: members, volunteers, contributors, and website visitors. We may expand this policy in the future to cover other categories of personal information.

Capitol Hill Village opened for business in 2007, and its activities, services, and operations are likely to change over time, especially in the first few years. These changes, as well as matters that we may not have fully anticipated at the beginning of operations, may necessitate alterations to this privacy policy. In addition, new laws and external events may force adjustments.

As a result, the Board of Directors reserves the right to make any changes to this policy that it deems appropriate. The Board does not anticipate making any major modifications to the core principles of respect for privacy and limited disclosure of personal information. However, we may make changes at any time, we may not provide advance notice to data subjects of those changes, and we expect to apply changes retroactively so that they apply to personal data collected and maintained prior to the effective date of the change.

The Board of Directors will endeavor to provide notice of changes in the privacy policy by posting notice of the changes at <http://capitolhillvillage.org/privacy>. If possible, we will post notice of changes before their effective date, and the notice will describe and explain the changes. However, we cannot guarantee either advance posting or advance notice. Each change in the policy will have a new version number. We will maintain an archive of superseded policies available for inspection upon request.

USE, DISCLOSURE, and PURPOSE

The main purpose for our personal information processing activities is to provide support for residents of the Capitol Hill community who become members of Capitol Hill Village.

We do not sell, rent, exchange, or share with third parties personal information about members, volunteers, or donors for use in marketing or solicitations of any kind, with the exception of vendors who may require information about members – including names, mail addresses, and email addresses – to provide services to CHV members; e.g. *Consumers' Checkbook*, as discussed below.

We do not solicit information online from children under the age of 13. We do not anticipate use of our online services by children. However, adult siblings of members may, if so designated by the member, use our services to assist the member.

Members: Providing support to members involves a variety of different services as well as the use of volunteers and third-party providers of goods and services. We may use or disclose personal information about members for these purposes as well as for activities that support the operations of Capitol Hill Village.

Example: If a member asks us for assistance in locating a carpenter for home repairs, we may share the name, address, telephone number, and other information about the member with one or more carpenters.

Example: We may work together with other organizations to provide services to members. We may share personal information about members or volunteers with these other organizations. For example, we have arranged with *Consumers' Checkbook* (an independent non-profit organization that rates local service firms, <http://www.checkbook.org>) to provide services to our members at no additional cost. We provide a list of members, including names, postal mail, and email addresses, to *Consumers' Checkbook* so that it knows who is eligible for services. We will be able to provide each member with a required user ID and password as an alternative to the member registering directly on the *Consumers' Checkbook* website. Members who register will be subject to *Consumers' Checkbook* normal communication policy, which calls for a double opt-in for most communications. Members who do not register may occasionally receive further invitations to register from *Consumers' Checkbook*.

Example: We may hire a third party to send bills, notices, or newsletters via postal mail or via email to members. The third party will have access to member information necessary to support the activity.

Example: If a member needs transportation to a health care provider, we may tell one or more volunteers (some of whom may be known to the member) about the member's need for services.

A member who seeks a particular service agrees that we can share personal information as necessary or appropriate for providing that service. If a member objects to the sharing of particular information, we will try to comply with the member's request, but we cannot guarantee to do so in all circumstances. As a small organization run in part by volunteers, it may not be administratively possible to comply with individual member requests for special confidentiality treatment. A request from a member, who wants his or her personal information treated differently than other members' information, can be granted only if submitted in writing and accepted in writing by CHV.

Example: If a member asks for help in locating a tax lawyer but asks that we not disclose his precise problem until he make a decision on whom to hire, we will try to avoid disclosing that information.

Example: A member provides us with emergency contact information for his son and for his daughter, but instructs us to always call his son first. We will try to comply with this instruction, but we may contact the daughter when the son is unavailable or if the emergency is critical.

In the normal course of operations, we do not plan to disclose our membership list to our members, but we reserve the right to do so. Some sharing of member information may occur as part of providing service to members. For example, if two members have doctors' appointments in the same place and time, we may provide transportation jointly. If we decide to publish a membership list for use of our members, we will provide members with the opportunity to keep their name, home address, and/or email address off any shared list.

Volunteers: We undertake a background check on each volunteer with the knowledge and consent of the volunteer. We will use and disclose personal information provided by a volunteer for background checks of the volunteer, including date of birth, and Social Security number, only to the organization running the background check. After the check is completed, we do not normally maintain a copy of the volunteer's SSN.

In the course of our operations, we may share some personal information about volunteers with members or with other volunteers. Most of this information sharing will be the type of sharing that occurs between neighbors and friends who provide assistance to one another.

Example: In order to coordinate driving activities, we may disclose the telephone numbers and car descriptions of volunteers to members or to other volunteers.

Donors: We do not expect to use or disclose personal information about donors except that we may disclose contact information in connection with soliciting contributions for Capitol Hill Village. We may use address correction services to update mailing addresses for donors who have moved.

Website visitors: We do not anticipate making any use or disclosure of personal information provided by website visitors except in connection with the purpose of their activity on the website.

Example: If a website visitor asks us about membership in Capitol Hill Village, we may retain the visitor's information and use or disclose it to solicit the visitor for membership in the future.

Uses and Disclosures Applicable to All Personal Information

Some uses and disclosures may occur in addition to those discussed above.

- We may make a use or a disclosure with the consent of a member.
- We will make any use or disclosure required by law.
- We may disclose personal information in response to a subpoena or court order, or if we are served with a search warrant. If appropriate, feasible, and lawful, we may make reasonable attempts (via telephone or email) to tell a member of Capitol Hill Village about any of these disclosures, either before or after they occur. However, we cannot guarantee that we will always be able to provide any notice of these demands or disclosures.
- We may voluntarily disclose personal information about website visitors and activities to law enforcement, to the website hosting company, or to security providers or other investigators in connection with the operation of our website.

- We may voluntarily disclose any personal information about members, volunteers, donors, employees, or others to law enforcement agencies if we have reason to believe that a law has been or may be violated.
- We may disclose personal information to the extent we deem it necessary:
 - (i) to protect the security or integrity of its website or online service;
 - (ii) to take precautions against liability;
 - (iii) in the event of a security breach, to take action to prevent, minimize, or remedy any harm from the breach;
 - (iv) to respond to judicial process; or
 - (v) to the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety.
- We may disclose personal information to those we employ or seek to employ as lawyers, accountants, insurers, financial institutions, credit card service providers, computer service providers, or others who may provide services to us.

When we disclose personal information to third parties, the information that we disclose may remain in the possession of the third party and will become subject to the third party's information practices. Those practices may differ from the policies that we follow. While we may be able to restrict the further processing of Capitol Hill Village information when we disclose it to third parties, we cannot guarantee that we will be always be able to do so. Capitol Hill Village is not responsible for the privacy policies or practices of any third party.

ACCESS AND CORRECTION

Access: Upon request, we will provide members, volunteers, and donors with access to any personal information about them that we maintain. We may also accept requests from others (e.g., employees) who are the subject of records that we maintain, but we cannot guarantee that we will always respond to those requests.

Anyone seeking to know if we have information about himself or herself or who want access to (or a copy of) his or her personal information can make a request in writing to:

Privacy Officer
 Capitol Hill Village
 Box 15126
 Washington, DC 20003-0126

A request should include sufficient identifying information (name and address) as well as a telephone number. In some cases, we may ask for a copy of identification (such as a driver's license or other government-issued identification).

We may also accept requests by email at privacy@capitolhillvillage.org or by telephone at 202-543-1778. However, we may not be able to authenticate requesters by email or telephone so we may ask for a written request and identification.

If a member has designated a third party (e.g., relative or friend) to act on their behalf, we will accept an access request on behalf of the member from the designee.

We will not normally charge members who want to inspect or have a copy of the information that we maintain about them. We reserve the right to impose charges for repeated requests, to deny or ignore requests that we deem to be harassing, or to deny or ignore requests that impose a substantial burden on staff.

Correction: A member, volunteer, or donor who is the subject of a record that we maintain may ask us to correct or amend that record. We may also accept requests from others who are the subject of records that we maintain, but we cannot guarantee to do so.

For routine changes to our records – such as a changed telephone number or a new email address – we will normally accept requests for changes by telephone or by other informal methods.

For some corrections, we will require a formal written request. A member, volunteer, or donor seeking a correction can make a request in writing to:

Privacy Officer
Capitol Hill Village
Box 15126
Washington, DC 20003-0126

A correction request should include sufficient identifying information (name and address) as well as a telephone number. In some cases, we may ask for a copy of identification (such as a driver's license). The request should also identify the contested information; should state whether the information is incorrect, inaccurate, or incomplete; and should state what information should appear in place of or in addition to the contested information.

If a member has designated a third party (e.g., relative or friend) to act on their behalf, we will accept a correction request on behalf of the member from the designee.

If we agree with the request, we will change the record appropriately. We may retain a copy of the contested information if retention is necessary or appropriate for legal, administrative, or other reasons.

If we do not agree or are unable to determine which information is correct, we will inform the requester, explain the reason we cannot make the change, and allow the requester to provide a short statement of disagreement that we will include in the record along with the contested information.

Example: We transport a member weekly to her physician. The physician informs us that the member suffers from a form of dementia and should be personally escorted from car to office. The member disagrees with the physician's diagnosis and asks us to change our record. We will not be able to determine if the diagnosis is correct so we will accept a statement of disagreement by the member to include in the member's record.

Example: A volunteer informs us that information in the background check that we obtained about the volunteer is wrong. It is unlikely that we will be able to determine the accuracy of public record or other information in the background check so we will accept a statement of disagreement that we will attach to our copy of the background check.

If we later disclose the contested information, we will endeavor to disclose the statement of disagreement at the same time. However, we cannot assure members or others that we will always be able to disclose the statement of disagreement along with the contested information.

INFORMATION COLLECTION

Capitol Hill Village collects personal information only by lawful and fair means. When appropriate, we collect personal information directly from the data subject or with the knowledge or consent of the data subject.

Members: Members who use the services that we provide – whether directly (through staff, volunteers, or online) or indirectly (through commercial or other third parties) – may disclose personal information to us incident to the provision of those services. We may retain this information in our records.

Example: If we drive you to a physician, we may learn and retain the name and specialty of your physician as well as facts about your medical condition.

In connection with providing services, we may collect from members' financial information such as credit card numbers and bank account numbers, Social Security Numbers, email addresses, home addresses, insurance numbers, and other personal information.

Sometimes while caring for elderly, infirm, or other members, it may be necessary or appropriate for us to collect personal information from third parties. These third parties may include family members, neighbors, health care providers, and others who are involved in the care or maintenance of the member, those who provide services to the members, and those who are otherwise involved in their personal lives. Members who use our services and facilities consent to the routine collection of personal information, including health information, in support of those services. It is impossible to predict with certainty the scope of possible information collection activities, but we will seek to limit collection to information that we consider appropriate for our purposes.

Example: When we provide transportation for a member to a health care provider, we may learn that the member uses a wheelchair. That information may remain in our records.

Example: A patient advocate working on behalf of a member may obtain information about the member from an insurance company, and we may retain that information in the records of that member.

In cases where we believe that there may be an emergency or threat to life or safety, we may suitably adjust our standards for information collection.

Example: If a member known to be housebound does not answer the door or telephone, we may make broader inquiries (e.g., to neighbors or the police) to seek information about the location or status of the member.

If a member informs us that the collection of some types of information or the collection of information from some sources is objectionable, we will endeavor to comply with the wishes of the member. However, in emergencies, threats to life or safety, or in other circumstances, we may not be able to comply with those wishes.

Volunteers: Those who volunteer to assist Capitol Hill Village must provide basic identification information, including Social Security Number, date of birth, and home address. We provide that information to a third party to conduct a background check. The report of the background check that we receive may reveal information from public records and commercial sources, including criminal history records, Department of Motor Vehicle records, and other sources. We use that information to assess the volunteer's suitability.

Donors: Capitol Hill Village does not routinely collect personal information from third parties about those who have made financial or other contributions other than any information provided directly by the donor. We may use address correction services to update mailing addresses for donors who have moved. We may obtain contact information about prospective donors from individuals, commercial list services, or from other non-profit organizations.

Website Visitors: Capitol Hill Village and its website hosting company may maintain standard Internet web logs that include IP addresses and other information about those who visit the website. Web logs often include the Internet domain from which you accessed our site; the address of the website you linked from; your Internet protocol address, which may be personally identifiable; the type of browser and operating system you use on your computer; the date, and time of your visit; and the pages that you viewed.

We have no plans to use the web logs to identify individuals. However, in the event that we suspect hacking, harassment, or illegal activity on the website, we may review the web logs and share them with law enforcement agencies or others to identify responsible individuals.

In addition to web logs, website visitors may provide information in several different ways.

- Visitors may send email messages. We may retain any personal information included in an email (including the sender's email address).
- Visitors may become members by filling out the membership application and providing names, addresses, telephone numbers, and email addresses. We will retain this information.
- Visitors may make donations through the website. Donors usually provide basic identification and address information. We accept credit card donations through Paypal <<http://paypal.com>>, an independent organization with its own privacy policy. If we accept credit cards directly, we will retain credit card information as appropriate for legal, contractual, and audit purposes. Those who make donations by check may share bank account numbers with us.
- In the event that we maintain a blog or other facility for members to communicate among themselves or with our staff through an open forum, we may retain any communications and the communications may be public.

We may set cookies on your computer when visiting our website. You can learn more about cookies at http://en.wikipedia.org/wiki/HTTP_cookie. You can control the setting of cookies in your browser. If you do not accept cookies, our website may not function for you as intended. We do not use cookies to track individual activities on our website.

DATA QUALITY

Capitol Hill Village seeks to maintain only personal information that is relevant to its activities. Given the broad range of services that we provide, we are likely to apply a broad standard of relevance. For members, the information that we maintain will normally relate to the services sought by a member or to membership status.

We seek to maintain personal information that is accurate, complete, and current for our purposes. Maintaining good quality information relies on cooperation between the record keeper (us) and the record subject (the member, volunteer, or donor). We count on our members, volunteers, and donors to help us by informing us when there is a change in their addresses, telephone numbers, email addresses, and other relevant information that we maintain about them. If a member's health status changes in a way that affects our services, the member should let us know.

We do not have a fixed schedule for discarding personal information that we maintain about our members and former members. That means that we may retain information indefinitely. We are likely to retain personal information about former members after a membership lapses on the theory that the member may rejoin. We may keep financial information, such as credit card transactions, for several years or longer to meet contractual, legal, or audit requirements.

Personal information about volunteers, donors, and website visitors is subject to the same broad data quality standards. We may eventually implement disposal schedules for obsolete information about these individuals, but we are likely to retain this information indefinitely for now.

SECURITY

Capitol Hill Village uses reasonable measures and safeguards to protect personal information against risks such as loss, unauthorized access, destruction, improper disclosure, and modification. We employ technical, administrative, and physical safeguards that are commercially available and typically used by small organizations.

We do not maintain Social Security Numbers, credit card numbers, and bank account numbers in an online database. Other personal information about members will be maintained in computers that are connected to the Internet because we need online access to support our operations and our services. We protect our computers with commercially available virus protection software, firewalls, and other standard computer security measures. Some information, other than SSN's, credit card information and bank information, may be held by volunteers or others on their personal computers, and we are not responsible for the security of those computers.

We may share information about members, volunteers, and donors with third parties that provide services to us or that assist us in providing services to members. These third parties are responsible for their own personal information processing and security measures. We try to employ third parties that provide appropriate levels of security for personal information about members that we share, but we cannot guarantee that third parties will use any particular level of security.

We cannot guarantee that information shared with volunteers (e.g., neighbors) or with independent service providers (e.g., small businesses) will be subject to any security safeguards. We tell all volunteers and employees about general privacy and security obligations.

ACCOUNTABILITY

Capitol Hill Village is responsible for compliance with this privacy policy by our employees and volunteers. Our Privacy Officer is the designated official for accepting questions or complaints about this policy.

Privacy Officer
Capitol Hill Village
Box 15126
Washington, DC 20003-0126

We will also accept questions or complaints by email at privacy@capitolhillvillage.org. We will respond to any reasonable question or complaint. Please include appropriate contact information, including a telephone number, with your communication.

The routine operations of Capitol Hill Village may involve some sharing of personal information with third party service providers and with others. Capitol Hill Village is not responsible for the privacy policies of these service providers or other third parties.

We ask each employee and volunteer to sign a statement acknowledging receipt of a copy of this privacy policy and committing to comply with the privacy policy.

POLICY HISTORY

- 0.1 7/5/07 First draft
- 1.1 9/6/07 First public posting

Capitol Hill Village thanks Robert Gellman, Privacy and Information Policy Consultant, www.bobgellman.com, for the preparation of this privacy policy.
