

PATHWAYS COMMUNITY NETWORK'S PRIVACY POLICY

As part of Pathways Community Network's commitment to protecting the privacy rights of individuals and organizations, they have adopted the following privacy policies.

Keeping You Informed

We will always notify people who utilize our Internet based services of:

- What personally identifiable information of yours is collected on our web sites
- Who collects this information
- How this information is used
- With whom this information may be shared, if anyone
- What choices are available to you regarding collection, use and distribution of this information
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information under Pathways Community Network, Inc.'s control, and
- How you can correct any inaccuracies in this information

Notification of Changes: If we decide to change our privacy policy, we will post those changes on our web site so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of email. Users will have a choice as to whether or not we use their information in the different manner. We will use information in accordance with the privacy policy under which the information was collected.

If you feel that Pathways Community Network is not abiding by its posted privacy policy, you should first contact William Matson, Executive Director, by e-mail at william.matson@pcni.org, or by phone at 404-639-9933 ext.301.

Information Collection and Use

Pathways Community Network will not sell or rent personally identifiable information that we collect, and will not collect or share personally identifiable information from visitors or system users without first informing them that information will be collected, whether or not it could be shared, and with whom it might be shared. We will not share any individual's personally identifiable information without that individual's permission.

Log Files: We may use IP addresses to analyze trends, administer the site and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

Links: Pathways Community Network web sites contain links to other sites. Please be aware that Pathways is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site, and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by Pathways Community Network's web sites.

News Service: If a user wishes to subscribe to our news service, we require contact information such as name and email address.

Surveys: From time-to-time our site requests information from users via surveys. Participation in these surveys is completely voluntary and the user therefore has a choice whether or not to disclose this information. Information requested may include contact information (such as name and address), and demographic information (such as zip code, age level). Survey information will be used for purposes of monitoring or improving the use and satisfaction of Pathways Community Network's services.

Security: Pathways Community Network takes every precaution to protect the information of people who use our services. When you submit sensitive information via a Pathways website, your information is protected both online and off-line. When our case management system users are asked to enter sensitive information (such as a social security number), that information is encrypted. While on a secure page, the lock icon on the bottom of web browsers such as Mozilla Firefox and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when you are just 'surfing'. While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, a technical support representative) are granted access to personally identifiable information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure our customers' information is protected. Finally, the servers that we store personally identifiable information on are kept in a secure environment, in a locked data center.

If you have any questions about the security at our websites, you should first contact William Matson, Executive Director, by e-mail at

william.matson@pcni.org, or by phone at 404-639-9933 ext.301.

Consumer Rights

Correcting/Updating Personal Information: If a user's personally identifiable information changes (such as an email address or zip code), or if a user no longer desires our service, we will endeavor to provide a way to correct, update or remove that user's personal data provided to us. This can be done by sending an email to support@pcni.org.

Choice/Opt-out: Users who no longer wish to receive our newsletter may opt-out of receiving these communications by following the directions at the end of the newsletter.

Other Systems

Data Systems: Pathways Community Network has incorporated the following comprehensive procedures to protect the privacy of people who receive services from organizations that use our PATHWAYS COMPASS community information sharing:

User agencies are required to agree to the following:

- Use of shared data must be based on client choice. Each client has control over which agencies access her/his data.
- Each client is asked to sign a Client Authorization Form giving her/his permission for information on the system to be accessed, and for new information added to the system. This form details the kinds of information that may potentially be shared between agencies with the client's permission, and the kinds of data that will not be shared. If the client does not sign the Client Authorization Form, her/his record must not be accessed.
- Each participating social services provider posts a list of other participating agencies in the local area, and provides clients with printed lists of participating providers on request.
- Participating agencies must have a grievance procedure that offers clients an opportunity to make complaints and have them addressed promptly and openly.
- Users are required to participate in regularly scheduled confidentiality and best practices training, facilitated by qualified presenters.
- In addition, our system incorporates the use of agency codes and passwords to protect client information, and client information is encrypted before it passes through the Internet.

Online Donations: Pathways Community Network is committed to preserving the privacy of its donors and volunteers, and safeguarding their information online. The following statement describes how online donors' and volunteers' information is protected.

Pathways Community Network does not sell, loan or trade names or other personal data on its donors or volunteers nor do we maintain any credit card information. Credit card donations through our website are processed exclusively by justgive.org. Justgive.org is committed to providing safe, secure and private online transactions. For further details about their privacy practices, please consult their privacy and security policy directly at www.justgive.org. When you make a donation to us through the JustGive.org link on our website, justgive.org shares your contact information (name, address and e-mail address) with us, unless you indicate during the online donation process that you wish to make your contribution anonymously. If you are an anonymous donor, justgive.org will not disclose your identity or contact information to Pathways. If you do not request anonymity, Pathways will receive your name and contact information. Pathways maintains this information in its database of supporters in order to keep you abreast of our future work and related issues that may be of interest to you. If you do not want to receive materials from us, you can send an email to info@pcni.org and we will remove you from our mailing lists.