Communication Privacy & Consent Policy

1. Purpose

The purpose of this policy is to ensure that **L.E.A.D.S. (The Excel Centers)** collects, stores, uses, and protects personal contact information in a transparent, secure, and lawful manner while providing meaningful communications to our clients, customers, volunteers, employees, and community members.

This policy applies to all departments, programs, websites, events, Excel Center locations, and digital platforms operated by **L.E.A.D.S. (The Excel Centers)**.

2. Information We Collect

We may collect the following contact information:

- Name
- Email address
- Mobile phone number
- Mailing address
- Communication preferences
- Program participation or customer relationship information
- Other information voluntarily provided to us
- Website usage and technical information, such as IP address, browser type, device type, operating system, referring website, pages visited, and interactions with our websites
- Cookie and similar technology information

Information may be collected through:

- Website forms
- Program enrollment
- Event registrations
- Volunteer applications
- Employment applications
- Surveys
- Social media lead forms
- Text message opt-ins
- In-person interactions
- Cookies and similar technologies
- Website analytics tools

3. Cookies, Website Analytics & Tracking Technologies

When you visit our websites, **L.E.A.D.S. (The Excel Centers)** may automatically collect certain information about your device and use of our websites through cookies and similar technologies. This information may include your browser and device type, operating system, pages visited, approximate location, referring website, and information about how you interact with our websites.

Cookies are small files stored on your device that help websites function properly and provide information about website usage. We may use cookies and similar technologies to:

- Operate and maintain our websites;
- Understand how visitors use our websites;
- Measure website traffic and performance;
- Improve website content and the user experience;
- Evaluate the effectiveness of our outreach and marketing efforts; and
- Support other functions described in this Privacy Policy.

Google Analytics

We use **Google Analytics**, a web analytics service provided by Google, to help us understand how visitors use our websites. Google Analytics may collect information about website activity and interactions through cookies and similar technologies. Information transmitted to Google may include information such as the page visited, device or browser information, and IP address. Google describes how it uses information from websites and applications that use its services at **https://policies.google.com/technologies/partner-sites**.

Visitors may control or delete cookies through their browser settings. Disabling certain cookies may affect how some website features function. Visitors who do not want their website activity available to Google Analytics may also use the **Google Analytics Opt-out Browser Add-on**, available at https://tools.google.com/dlpage/gaoptout.

Cookie Choices

Where required by applicable law, we will provide visitors with appropriate choices regarding non-essential cookies and similar tracking technologies. Visitors may also manage their cookie preferences through available website controls and/or their browser settings.

How We Use Your Information

We use contact information to:

- Communicate regarding services or programs
- Complete wellness checks
- Send appointment reminders
- Provide updates related to participation in our programs
- Share organization news and impact
- Notify individuals about events
- Send newsletters
- Conduct satisfaction surveys
- Respond to inquiries
- Meet legal or regulatory obligations

4. Text Message (SMS) Communications

Individuals may choose to receive text messages from **L.E.A.D.S. (The Excel Centers)**.

Text messages may include:

- Academic progress
- Appointment reminders
- Event information, including links to newsletters and resources
- Program updates
- Volunteer opportunities
- Emergency notifications
- Wellness Checks and encouragement
- Community announcements

Message frequency varies.

Message and data rates may apply.

Recipients may opt out at any time by replying **STOP**.

Recipients may request assistance by replying **HELP** or contacting

sms-help@ExcelCenterHS.org

5. Email Communications

Individuals who provide an email address may receive:

- Newsletters
- Organization updates
- Program information

- Academic progress
- Wellness checks and encouragement
- Event invitations
- Volunteer opportunities
- Educational resources

Every marketing email will include an easy unsubscribe option.

Transactional emails related to active services or participation may continue as necessary.

6. Consent

We obtain consent by one or more of the following methods:

- Website checkbox
- Registration form
- Program enrollment
- Event registration
- Text message keyword enrollment
- Written authorization
- Verbal consent documented by staff

Consent records will be maintained whenever practical.

Individuals may withdraw consent at any time.

7. Sharing Information

L.E.A.D.S. (The Excel Centers) does **not sell** personal information.

Information may be shared only:

- With trusted service providers who assist us in delivering communications
- When required by law
- To protect the safety or rights of individuals or the organization
- With the individual's permission

All vendors handling personal information are expected to maintain appropriate privacy and security safeguards.

8. Data Security

The organization maintains administrative, technical, and physical safeguards to protect personal information, including:

- Secure systems

- Password protection
- Role-based access
- Encryption where appropriate
- Staff training
- Regular security reviews

Access to contact information is limited to employees and authorized contractors with a legitimate business need.

9. Data Retention

Personal information will be retained only as long as necessary to:

- Provide services
- Meet legal requirements
- Maintain business records
- Support ongoing communication preferences

Information no longer needed will be securely deleted or destroyed according to the organization's records retention schedule.

10. Individual Rights

Individuals may request to:

- Review their contact information
- Update inaccurate information
- Change communication preferences
- Opt out of marketing communications
- Request deletion where legally permitted

Requests should be directed to:

sms-help@ExcelCenterHS.org

Communication Collection & Use Process

Step 1 – Collection

Departments collecting contact information must:

- Clearly explain why information is being collected.
- Obtain consent when required.
- Record the source of the information.
- Use only approved forms or systems.

Step 2 – Storage

Information must be entered into approved systems such as:

- Excel Communications Database Share Point
- Student database
- Accounting and Purchasing software
- Volunteer management system
- Program management software

Personal information should never be stored on personal devices or unsecured spreadsheets unless specifically approved.

Step 3 – Access

Departments may access contact information only for legitimate business purposes.

Examples include:

- Client Services
- Mission Programs
- Retail Operations
- Marketing & Communications
- Volunteer Services

Access should be limited according to job responsibilities.

Step 4 – Communication Approval

Marketing communications should follow this workflow:

1. Department submits communication request.
2. Marketing reviews branding and messaging.
3. Appropriate department verifies content.
4. Scheduled through approved communication platforms.
5. Communication archived when appropriate.

Step 5 – Managing Preferences

Recipients may:

- Unsubscribe from emails.
- Reply STOP to text messages.
- Update communication preferences.
- Contact the organization directly.

Preference changes should be processed promptly.

Step 6 – Vendor Requirements

Third-party providers (email, SMS, CRM, etc.) must:

- Protect personal information.
- Use information only to provide contracted services.
- Maintain appropriate security measures.
- Comply with applicable privacy laws.

Roles & Resp

Role	Responsibility
Legal/Compliance	Reviews privacy policy and legal compliance
Information Technology	Maintains system security and access controls
Marketing & Communications	Oversees email, SMS, website forms, and communication preferences
Department Leaders	Ensure staff follow collection and communication procedures
All Employees	Protect personal information and report privacy concerns

Policy Review

This policy shall be reviewed at least annually or whenever significant changes occur to:

- Applicable laws
- Communication technologies
- Organizational practices
- Third-party vendors

Effective Date: 9.24.26

Policy Owner: Marketing & Communications in partnership with Legal/Compliance and Information Technology

Approved By: Chief Financial & Compliance Officer; Information Technology

Next Review Date: 10.24.26