



# DELTA SIGMA THETA SORORITY, INC.

*A Service Sorority Founded in 1913*

## PRIVACY POLICY

Effective Date: July 3, 2019.

### 1. **Introduction and Overview.**

This Privacy Policy describes how Delta Sigma Theta Sorority, Inc. (“DST,” “we,” “our,” or “us”) collects, uses, and shares information about you as well as your rights and choices about such use and sharing. It applies to your use of our website (<https://www.deltasigmatheta.org/>) and any online service location that posts a link to this Privacy Policy, including all apps, features, content, and other services that we own, control, and make available through such online service location, and individual Delta chapter and regional sites that link to this Policy (collectively, the “Service”). This Privacy Policy also applies to our information collection activities outside of the Service (unless otherwise stated at the time of collection).

By using the Service, you agree to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, discontinue use of the Service.

If you have any questions about our privacy practices, please contact us as described in the “Contact Us” section below.

### 2. **Information Collection.**

#### **A. Information You Provide.**

We collect information you provide directly via the Service, such as when you apply for membership or create an account in our member portal, update your profile, access our content, make a purchase or pay dues, participate in a survey, or promotion, contact customer support, register for an event, or apply for a job. We may use Service Providers (defined below) to collect this information.

The information we collect includes information that identifies you personally (whether alone or in combination). Some examples of information we collect include the following:

- **Contact Data.** We collect your first and last name, e-mail address, postal address, phone number, and other similar contact data.

- **Credentials.** We collect passwords, password hints, and other information for authentication and account access.
- **Demographic Data.** We collect demographic information including your age, date of birth, gender, and country.
- **Payment Data.** We collect data necessary to process your payment if you make a purchase, including your payment instrument number (such as a credit card number), and the security code associated with your payment instrument.
- **Profile Data.** We collect your username, education information including grade point average, interests, membership category, Delta activity over the years, skills and certifications, community service, and other profile data.
- **Contacts.** We collect data about your contacts in order to fulfill a request by you, such as finding your contacts on the Service or inviting your contacts to join the Service. Such functionality is only intended for United States (“U.S.”) residents. By using this functionality, you acknowledge and agree that both you and your contacts are based in the U.S. and that you have your contacts’ consent for us to use their contact information to fulfill your request. We also collect emergency contact information from all of our members.
- **Content.** We collect the content of messages you send to us, such as feedback and product reviews you write, or questions and information you provide to customer support. We also collect the content of your communications as necessary to provide you with the services you use. For example, if you call voluntarily complete a survey, we collect and analyze the responses we receive.
- **Financial Data.** We collect information about your historical payment of dues. Further, if you apply for a leadership position, we may collect financial information regarding your campaign, including cash received and expenses.
- **Resume Data.** We collect data as necessary to consider you for a job opening or leadership position if you submit an application to us, including your employment history, transcript, writing samples, and references.

You may choose to voluntarily submit other information to us through the Service that we do not request, and, in such instances, you are solely responsible for such information.

## **B. Information Collected Automatically.**

We automatically collect information about your device and how your device interacts with our Service. We may use Service Providers to collect this information. Some examples of information we collect include the following:

- **Service Use Data.** We collect data about the features you use, the pages you visit, the e-mails and advertisements you view, the products you purchase, the time of day you browse, your referring and exiting pages, and other similar information.
- **Device Connectivity and Configuration Data.** We collect data about the type of device or browser you use, your device’s operating software, your internet service provider, your device’s regional and language settings, and other similar information. This data also includes IP address, MAC address, device advertising Id (e.g., IDFA or AAID), and other device identifiers.

We use various current – and later – developed technologies to collect this information (“**Tracking Technologies**”), including the following:

- **Log Files.** A log file is a file that records events that occur in connection with your use of the Service, such as your service use data.
- **Cookies.** A cookie is a small data file stored on your device that acts as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate the Service and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising both on and off the Service. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings.
- **Pixels.** A pixel (also known as a web beacon) is code embedded in a website, video, e-mail, or advertisements that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, e-mail, or advertisement that contains a pixel, the pixel may permit us or a third party to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from third parties that allow us track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.
- **App Technologies.** There are a variety of tracking technologies that may be included in our apps, and these are not browser-based like cookies and cannot be controlled by browser settings. For example, our apps may include third party SDKs, which is code that sends information about your use to a server, and is in effect the app version of a pixel. These SDKs allow us track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.
- **Device Fingerprinting.** The process of analyzing and combining sets of information elements from your device’s browser, such as JavaScript objects and installed fonts, in

order to create a “fingerprint” of your device and uniquely identify your browser and device.

Some information about your use of the Service and certain Third Party Services (defined below) may be collected using Tracking Technologies across time and services and used by us and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on the Service and certain Third Party Services.

For further information on Tracking Technologies and your rights and choices regarding them, see the sections entitled “Third Parties” and “Your Rights and Choices” below.

### **C. Information from Other Sources.**

We also obtain information about you from other third party sources. To the extent we combine such third party sourced information with information we have collected about you through the Service, we will treat the combined information in accordance with the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the data. These third party sources vary over time, but have included:

- Social networks when you reference our Service or grant permission to DST to access your data on one or more of these services.
- Partners with which we offer co-branded services, sell or distribute our products, or engage in joint marketing activities.
- Publicly-available sources such as open government databases or other data in the public domain.

For further information on Third Party Services, see the section entitled “Third Parties” below.

### **3. Use of Information.**

We use information about you for our legitimate interests, including to:

- Manage our Service, including your registration and account.
- Perform services requested by you, such as to respond to your comments, questions, and requests, provide customer service, and process transactions.
- Send you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.
- Manage Chapter finances, including dues payments.

- Prevent and address fraud, breach of policies or terms, and threats or harm.
- Monitor and analyse trends, usage, and activities.
- Conduct research, including focus groups and surveys.
- Improve the Service or other DST websites, apps, marketing efforts, products and services.
- Develop and send you direct marketing, including advertisements and communications about our and third party products, offers, promotions, rewards, events, and services.

We also use information about you with your consent, including to:

- Serve advertising tailored to your interests on our Service and Third Party Services.
- Fulfill any other purpose disclosed to you and with your consent.

We may use information that does not identify you (including information that has been de-identified) without obligation to you except as prohibited by applicable law. For information on your rights and choices regarding how we use your information, please see the section entitled “Your Rights and Choices” below.

#### 4. **Sharing of Information.**

We share information about you as follows:

- **Service Providers.** We share your information with our agents, vendors, and other service providers (collectively “**Service Providers**”) in connection with their work on our behalf. Service Providers assist us with services such as payment processing, background screening, data analytics, marketing and promotional services, surveys, website hosting, and technical support. Service Providers are prohibited from using your information for any purpose other than to provide this assistance, although we may permit them to use aggregate information which does not identify you or de-identified data for other purposes.
  - **Affiliates.** We may share your information with our related entities including local chapters. For example, we may share your information with our affiliates for customer support, marketing, and technical operations. Chapter representatives and other members may have access to any profile information to you enter through our membership portal.
- Business Partners.** We may share your information with our business partners in connection with offering you co-branded services and events, selling or distributing our products, or engaging in joint marketing activities.
- **Third Parties.** We may share your information with third parties for purposes of facilitating your requests (such as when you choose to share information with a social

network about your activities on the Service) and in connection with tailoring advertisements, measuring and improving our Service and advertising effectiveness, and enabling other enhancements.

- **Members.** We may share your member information with other verified members to allow them to contact you regarding member news or events (e.g., funerals, reunions, alumni celebrations, Founder’s Day events, etc.). You may opt out of this sharing by contacting us at [memberrelations@deltasigmatheta.org](mailto:memberrelations@deltasigmatheta.org).
- **Merger or Acquisition.** We may share your information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.
- **Security and Compelled Disclosure.** We may share your information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also share your information to protect the rights, property, life, health, security and safety of us, the Service or any third party.
- **Consent.** We may share your information for any other purpose disclosed to you and with your consent.

Without limiting the foregoing, in our sole discretion, we may share aggregated information which does not identify you or de-identified information about you with third parties or affiliates for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we share your information, please see the section entitled “Your Rights and Choices” below.

## 5. **Public Information.**

Certain areas of the Service, such as user profiles and app, are designed to help you share information with the world. If you make information public through our Service, other people will have access to it. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be able to edit or delete such information; however, California residents and data subjects in Europe have additional rights as set forth in “Your Rights and Choices” below.

## 6. **Third Parties.**

### A. **Third Party Services.**

Our Service contains content from and hyperlinks to websites, locations, platforms, and services operated and owned by third parties (“**Third Party Services**”). These Third Party Services may use Tracking Technologies to independently collect information about you and may solicit information from you. The information collected and stored by third parties, whether through our

Service, a Third Party Service, a Third Party Feature (defined below), or a third party device, remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

## **B. Third Party Features.**

We may allow you to connect our Service to a Third Party Service or offer our Service through a Third Party Service (“**Third Party Features**”). If you use a Third Party Feature, both we and the applicable third party may have access to and use information associated with your use of the Third Party Feature, and you should carefully review the third party’s privacy policy and terms of use. Some examples of Third Party Features include the following:

- **Liking, Sharing, and Logging-In.** We may embed a pixel or SDK on our Service that allows you to “like” or “share” content on, or log-in to your DST account through, Third Party Services, including social networks such as Facebook and Twitter. If you choose to engage with such a Third Party Service through our Service, we may collect any information you have authorized the Third Party Service to share with us (such as your user ID, billing information, public profile information, e-mail address, birthday, friends list, and other account and profile data). Likewise, if you choose to engage with such a Third Party Service through our Service or visit our Service while logged in to that Third Party Service on your device, the Third Party Service may receive information about your activities on our Service and be able to associate that information with information the Third Party Service already has about you.
- **Brand Pages.** We may offer our content on social networks such as a Facebook and Twitter. Any information you provide to us when you engage with our content (such as through our brand page) is treated in accordance with this Privacy Policy. Also, if you publicly reference our Service on a Third Party Service (e.g., by using a hashtag associated with DST in a tweet or post), we may use your reference on or in connection with our Service.

## **C. Analytics and Interest-Based Advertising.**

Our Service contains Tracking Technologies owned and operated by Third Parties. For example, we use Tracking Technologies from third party analytics providers, such as Google Analytics, to help us analyze your use of the Service, compile statistic reports on the Service’s activity, and provide us with other services relating to Service activity and internet usage. We also work with ad serving services, advertisers, and other third parties to serve advertisements on the Service and/or on Third Party Services. These third parties may use Tracking Technologies on our Service and Third Party Services (including in e-mails and advertisements) to track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you on the Service and Third Party Services or third party devices after you have left the Service (“**Interest-based Advertising**”).

We serve ads on and through Third Party Services, such as Facebook and Google, that are targeted to reach people (or people similar to people) who have visited our Service or are identified in one or more of our databases (“Matched Ads”). This is done by us uploading a customer list to the Third Party Service or incorporating a pixel from the Third Party Service on our Service, and the Third Party Service matching common factors between our data and their data. To opt-out of receiving Matched Ads, please contact the applicable Third Party Service. If we use Facebook Custom Audiences to serve Matched Ads on Facebook services, you should be able to hover over the box in the right corner of such Facebook ads and find out how to opt-out. We are not responsible for such Third Party Service’s failure to comply with your opt-out instructions.

For further information on Tracking Technologies and your rights and choices regarding them, please see the sections entitled “Information Collected Automatically” above and “Your Rights and Choices” below.

## 7. **Your Rights and Choices.**

### A. **Review and Update of Account Information.**

You may access, update, or remove certain account information that you have voluntarily submitted to us through the Service by updating your account online or by sending an e-mail to the e-mail address set forth in the section entitled “Contact Us” below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. California residents and data subjects in Europe have additional rights as set forth in the sections entitled “Your California Privacy Rights” and “Your European Privacy Rights” below.

### B. **Tracking Technology Choices.**

- **Cookies and Pixels.** Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- **App Technologies.** You can reset your device advertising Id at any time through your device settings, which is designed to allow you to limit the use of information collected about you. For information on how to do this on Apple devices, visit Apple.com or <https://support.apple.com/en-us/HT202074>. For information on how to do this on Android devices, visit Google.com. You can stop all collection of information via an app by uninstalling the app.
- **Location-Identifying Technologies.** The location data collected through an app depends on your device settings and app permissions. You can exercise choice over the location data collected through our apps by (i) for GPS data, disabling location in your device settings or disabling location permissions to that app; (ii) for Bluetooth data, disabling



Bluetooth and any Bluetooth scanning option in your device settings; or (iii) for WiFi data, disabling WiFi and any WiFi scanning option in your device settings. You can stop collection of all location data via an app by uninstalling the app.

- **Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take action with respect to “Do Not Track” signals or other mechanisms. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Please be aware that if you disable or remove Tracking Technologies some parts of the Service may not function correctly.

### **C. Analytics and Interest-Based Advertising.**

You can opt-out of your data being used by Google Analytics through cookies by visiting <https://tools.google.com/dlpage/gaoptout> and downloading the Google Analytics Opt-out Browser Add-on.

Some of the third parties that collect information from or about you on the Service in order to provide more relevant advertising to you participate in the Digital Advertising Alliance (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. This program offers a centralized location where users can make choices about the use of their information for online behavioral advertising. To learn more about the DAA and your opt-out options for their members, please visit (i) for website opt-out, <http://www.aboutads.info/choices>; and (ii) for mobile app opt-out, <http://www.aboutads.info/appchoices>. In addition, some of these third parties may be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and your opt-out options for their members, please visit <http://www.networkadvertising.org/choices/>. Please note that if you opt-out of online behavioral advertising using any of these methods, the opt-out will only apply to the specific browser or device from which you opt-out. Further, opting-out only means that the selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). We are not responsible for effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs.

You may also limit our use of information collected from or about your mobile device for purposes of serving online behavioral advertising to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Interest-Based Ads” (for Android devices).

### **D. Communications.**

- **E-mails.** You can opt-out of receiving promotional e-mails from us at any time by following the instructions as provided in e-mails to click on the unsubscribe link, or e-mailing us at the e-mail address set forth in the section entitled “Contact Us” below with

the word UNSUBSCRIBE in the subject field of the e-mail. Please note that you cannot opt-out of non-promotional e-mails, such as those about your account, transactions, servicing, or DST's ongoing business relations.

- **Push Notifications.** If you have opted-in to receive push notification on your device, you can opt-out at any time by adjusting the permissions in your device or uninstalling our app.
- **Text Messages and Calls:** We may send you reoccurring text messages and calls (including prerecorded and/or by autodialer) to the phone number you provide for transactional and direct marketing purposes. You understand that your consent is not required as a condition of purchase, and that you can opt-out of receiving text messages or calls from us at any time by: (i) for text messages, texting "STOP" in response to any text message you receive from us or contacting us here and specifying you want to opt-out of text messages; and (ii) for calls, requesting opt-out during any call you receive from us or contacting us here and specifying you want to opt-out of calls. For text messages, you can also text "HELP" at any time for more information. You understand that you may receive a text message confirming any opt-out by you. Standard message, data, and other fees may be charged by your carrier, and carriers may deduct charges from pre-paid amounts or data allowances, for which you are responsible. Not all phone and/or carriers are supported. Contact your carrier for further details.

Please note that your opt-out is limited to the e-mail address, device, and phone number used and will not affect subsequent subscriptions.

#### **E. Your California Privacy Rights.**

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes. Under the law, a business should either provide California customers certain information upon request or permit California customers to opt in to, or opt out of, this type of sharing.

DST will not share personal information as defined by California's "Shine the Light" law with third parties and/or affiliates for such third parties' and affiliates' own direct marketing purposes. If you are a California resident and wish to obtain information about our compliance with this law, please contact us as set forth in the section entitled "Contact Us" below. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that DST is not required to respond to requests made by means other than through the provided e-mail address or mail address.

Any California residents under the age of eighteen (18) who have registered to use the Service and posted content or information on the Service, can request that such information be removed from the Service by sending an e-mail to the e-mail address provided under "Contact Us" below. Requests must state that the user personally posted such content or information and detail where

the content or information is posted. We will make reasonable good faith efforts to remove the post from prospective public view.

## **F. Your European Privacy Rights.**

### *Data Controller*

EU data protection law makes a distinction between organizations that process personal data for their own purposes (known as “controllers”) and organizations that process personal data on behalf of other organizations (known as “processors”). DST acts as a controller with respect to personal data collected or provided through the Service.

### *Lawful Basis for Processing*

Data protection laws in Europe require a “lawful basis” for processing personal data. Our lawful bases include where: (a) you have given your consent to our processing for a specific purpose, either to us or to our service providers or partners; (b) processing is necessary for the performance of a contract with you or to comply with a legal obligation; or (c) processing is necessary for the purpose of legitimate interests pursued by DST, and fundamental rights do not override these interests.

### *Your Rights*

If you are a data subject in Europe, you have the right to access, rectify, or erase any personal data we have collected about you through the Service. You also have the right to data portability and the right to restrict or object to our processing of personal data we have collected about you through the Service. In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to us.

To exercise any of these rights, send a written request to us at the address provided under “Contact Us” below and specify which right you intend to exercise. We will respond to your request within 30 days. We may require additional information from you to allow us to confirm your identity. Please note that we store information as necessary to fulfil the purposes for which it was collected and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

### *Complaints*

If you have any issues with our compliance, you have the right to lodge a complaint with a European supervisory authority. We would, however, appreciate the opportunity to address your concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us at the address provided under “Contact Us” below.

## **8. Children.**

The Service is generally intended for a general audience and not directed to children under thirteen (13) years of age. In most cases, DST does not knowingly collect personal information as defined

by the U.S. Children’s Privacy Protection Act (“**COPPA**”) in a manner that is not permitted by COPPA. If you are a parent or guardian and believe DST has collected such information in a manner not permitted by COPPA, please contact us as set forth in the section entitled “Contact Us” below, and we will remove such data to the extent required by COPPA. If we intend to collect personal information from children, we take additional steps to protect children’s privacy, including notifying parents about our information practices with regard to children, obtaining consent from parents for the collection of personal information from their children in accordance with applicable law, limiting our collection of personal information from children to no more than is reasonably necessary for the purpose for which it is collected, and giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted.

**9. Data Security.**

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

**10. Changes to this Privacy Policy.**

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your e-mail address.

**11. Contact Us.**

If you have any questions or comments about this Privacy Policy, our data practices, or our compliance with applicable law, please contact us:

By e-mail:

[privacy@deltasigmatheta.org](mailto:privacy@deltasigmatheta.org)

By mail:

Delta Sigma Theta Sorority, Inc.  
1707 New Hampshire Ave., NW  
Washington, DC 20009