



*Our mission is to facilitate the use of general aviation
to transport endangered species and to promote
conservation through education and outreach*

TURTLES FLY TOO'S PRIVACY STATEMENT

Updated April 15, 2020

Turtles Fly Too (hereinafter known as **TF2**) takes your privacy very seriously and cares about how your information is collected, used, stored, and shared. We are providing this Privacy Statement to explain our practices and the choices that you can make about the way your information is used by TF2. The Privacy Statement describes our practices in connection with the information we collect through our website from which you are accessing this Privacy Statement ("**Website**"), through the software applications made available by us for use on or through computers and mobile devices (the "**Apps**"), through our social media pages that we control through which you are accessing this Privacy Statement (collectively, our "**Social Media Pages**"), as well as through HTML-formatted email messages that we send to you that link to this Privacy Statement and through offline interactions that we may have with you (collectively, including the Website, the Apps and our Social Media Page, providing personal curated content) (the "**Services**").

For U.S. users only—by visiting this website you are accepting the policies described in this statement and consenting to disclosure of Personal Information to trusted third parties including grantors, grantees, other charities, collaborative partners, and sponsors, to permit them to send you marketing communications, consistent with your choices.

Personal Information We Collect

"**Personal information**" is information that identifies you as an individual or relates to an identifiable individual.

- We collect the following Personal Information: Name, email address, postal address, phone number, profile picture, social media ID, and similar contact information and credit card or other payment information. If you choose to provide your payment or credit card information to TF2, we will use that information for the purposes for which it was provided; TF2 does not store credit card or other payment information.

How We Collect Personal Information

TF2 and our service providers collect Personal Information in a variety of ways, including:

- We collect Personal Information you provide to us over the phone, in email, through a face-to-face conversation, or through online and offline forms such as e-newsletters, surveys, donation forms,

▪ AVIATION ▪ CONSERVATION ▪ COMMUNITY

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East Coast Office: 22441 SW 88th Place, #304 | Miami, FL 33190 | 904-463-0513

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event registration/participation (including volunteering) and advocacy action alerts that you populate.

- We use third-party postal address, phone number, email address products, and other sources to provide and collect accurate and updated contact information.
- We collect information from social media platforms and other sources used by you or people with whom you are friends or otherwise connected on social media platforms.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

How TF2 Uses Personal Information

The TF2 and our service providers use Personal Information for legitimate business purposes including:

- **Providing the functionality of the Services and fulfilling your requests**
 - Process and respond to inquiries and for the purposes for which you provided the information, such as to process donations, register or renew you as a donor or supporter, purchase merchandise, or receive information about a project, special event, and service.
 - Respond to your questions and comments.
 - Alert you to administrative information such as information regarding the Services' features, and changes to our terms, conditions, and policies.

We will do the above to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Providing personalized services.**
 - Personalize the content, improve the navigability of the Services, and customize your experience on the Services, including targeted content, offers, and advertising on the Services, or via email or text message.
 - Notify you about special programs, offers, products and services that we believe will be of interest to you, either from TF2 or on behalf of our affiliates or other third parties.

We will provide personalized services either with your consent or because we have a legitimate interest.



- **Allowing you to participate in special programs, activities, events, or promotions.**
 - Facilitate your participation in sweepstakes, contests, and similar promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose information including your Personal Information. We suggest that you read any such rules carefully.

We will provide personalized services either with your consent or because we have a legitimate interest.

- **Accomplishing our business purposes.**
 - Protect the security or integrity of the Services and TF2, such as by protecting against fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users.
 - Conduct surveys to measure your satisfaction with aspects of TF2's activities.
 - Analyze data, usage trend identification, promotional campaign development, audit, fraud monitoring or prevention, new product or service development, Services' enhancement, interaction improvement, or operating and expansion purposes.
 - To enforce our [Terms of Use](#) or other program terms.

We use this information to manage our contractual relationship with you, comply with a legal obligation, and/or because we have a legitimate interest.

- **Aggregating and/or anonymizing Personal Information.**
 - If we aggregate and anonymize Personal Information the data will no longer be considered Personal Information and we may use it for any purpose.
- **As otherwise described to you at the point of collection.**

How TF2 Discloses Personal Information

We disclose Personal Information:

- **To our service providers:** We disclose the information we collect from you to third parties who perform functions on our behalf such as website hosting, data analysis, payment processing, information technology and related infrastructure provisions, solicitation or acknowledgment of charitable gifts, aggregate analysis and marketing activities as well as professional advisors such as auditors and attorneys.



- **To our affiliates:** We share information with our related entities such as affiliates and subsidiaries for the purposes detailed in this Privacy Statement.
- **To other organizations:** We share your information, excluding e-mail address and phone number, with unaffiliated third parties for their own uses. You may choose to opt out as described in “How You Can Control the Collection and Use of Your Information” below.
- **You may elect to disclose Personal Information:** If you post information or materials on our message boards, chat, profile pages, blogs, and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public. We urge you to be very careful when deciding to disclose any information on the Services.

Other Uses and Disclosures

We also use and disclose your Personal Information if it would be necessary or appropriate, in ways other than those noted above, especially when we have a legal obligation or legitimate interest to do so.

- **To comply with applicable law:**
 - This can include laws outside your country of residence.
- **To respond to requests from public and government authorities:**
 - This can include authorities outside your country of residence.
- **To cooperate with law enforcement:**
 - For example, when we receive law enforcement requests and orders.
- **For other legal reasons:**
 - To enforce our terms and conditions;
 - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction:**
 - In addition, we have legitimate interest to disclose or transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our operations, assets (including in connection with any bankruptcy or similar proceedings).



Other Information

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. If we are required to treat Other Information as Personal Information under applicable law, then we use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Statement.

We collect Other Information such as IP address, browser type, mobile device type, content visited while on the Websites or Apps, Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, or the duration of the use of the Services. Collecting browser activities or IP addresses, along with the time of the visit and the page(s) that were visited, are common practices, and are often performed automatically by many websites, applications and other services for such purposes as calculating usage levels, helping diagnose server problems, and administering the Services. In addition:

- We and our service providers collect information from the Apps that you use. We track and collect Apps’ usage data such as the date and time the Apps accesses our servers and what information and files have been downloaded to the Apps based on your device number.
- We collect information that can identify the physical location of your mobile device or geographic location of your device by, for example, using satellite, cell phone tower or Wi-Fi signals to provide you with personalized location-based services and content.
- We use “Cookies” and similar technology to obtain information about your visits to the Services or your responses to our e-mails or other electronic communications—both individually and in an aggregated form. Cookies are pieces of data placed on your device when you visit the Services that help us recognize you when you come back to the Website, allowing us, for example, to remember the email address and password you use when you log in on a specific computer. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We also use cookies or other technologies to track responses to our online advertisements. At this time, we do not respond to Do Not Track requests.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the



Services and you may not be able to access some of the features we offer. For example, we may not be able to recognize your computer, and you may need to log in every time you visit. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- We use third-party web and mobile app analytics and optimization services to improve the Services and enhance the visitor experience by, for example, recording mouse clicks, mouse movements, scrolling activity as well as text you type in the Services.
- We use pixel tags and other similar technologies to, among other things, track the actions of users of the Services, measure the success of our marketing campaigns, and compile statistics about use of the Services and response rates.
- We use Google Analytics and Adobe Analytics which use Cookies and other similar technologies to collect information about use of Services anonymously and report website trends. You can learn about Google's practices by visiting www.google.com/policies/privacy/partners/, and you may opt out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. You can learn about Adobe's practices by visiting <https://www.adobe.com/privacy/analytics.html> and you may opt out by visiting <https://www.adobe.com/privacy/opt-out.html>.
- We collect information about your interactions with email messages, such as the links clicked on and whether the messages were opened or forwarded.
- Aggregate information: We share aggregate statistics and other non-personally identifiable information with third parties for marketing, advertising, research, or similar purposes. These aggregate statistics will not allow anyone to identify you.

We use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we combine Other Information with Personal Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

Our Advertising

We may use third-party advertising companies to address advertisements that may be of interest to you when you access and use the Services and other websites, based on information relating to your access to and use of the Services and other websites. To do so, such companies may place or recognize a unique Cookie on your browser (including through use of pixel tags). They may also use these technologies, along with your Mobile Advertising ID and information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.



This advertising may be directed to you because you visited or logged in to our website. When we generate this advertising, data we collect from you through online Cookies your Mobile Advertising ID, and other technologies may be combined with other de-identified data (such as a hashed, non-readable email or postal address) in order to tailor ads on your computer, device or Smart TV to you or your business based on your preferences and other information about you. To learn more about targeted advertising, these providers, or how you may opt out, please visit <http://www.networkadvertising.org/choices/> or the DAA's consumer choice page at <http://www.aboutads.info/choices>.

How You Can Control Collection and Use of Your Information

- **Personal Information Sharing with Other Organizations:** You may, at any time, choose to opt out on a going forward basis of sharing your information for the purpose of renting or exchanging with unaffiliated third party organizations for their own uses by calling us at (208) 484-7774, or emailing us at info@TurtlesFlyToo.org. We do not rent or exchange your e-mail address or phone number.
- **Marketing Email Opt Out:** You may, at any time, choose to opt out of receiving marketing-related emails by following the opt-out procedures at the bottom of our emails. Please allow 10 business days for us to respond to your request.
- **Mailing List:** You may, at any time, choose to opt out of receiving mail from us by calling us at (208) 484-7774 or emailing us at info@TurtlesFlyToo.org. Please allow 30-60 days for your address to be removed from any mailings that are currently underway.
- **Telemarketing:** You may, at any time, choose to opt out of TF2's residential telemarketing list by calling us at (208) 484-7774 or emailing us at info@TurtlesFlyToo.org. Please allow 30 days for your telephone number to be removed from any programs that are currently underway.

Accessing, Modifying, Updating, and Deleting Your Information: We strive to keep our records as accurate as possible. You may, under applicable laws, have a right to access, correct, restrict, update, modify or delete your Personal Information that you have previously provided to us at any time. To do so, or to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), please call us at (208) 484-7774 or email us at info@TurtlesFlyToo.org.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.



Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a donation or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such donation or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed.

Your California Privacy Rights

If you are a California resident and have provided Personal Information to us, you are entitled by California law to request information regarding certain categories of Personal Information we share with third parties for their direct marketing purposes. Your request should be submitted to: Attn: Member Care Team, Turtles Fly Too, 4911 No. Parkwood St., Boise, ID 83704. Within 30 days of receiving such a request, we will provide a response listing the categories of Personal Information disclosed to third parties, along with the names and addresses of those third parties, for their own direct marketing purposes during the previous year. This request may be made no more than once per calendar year, and we reserve our right not to respond to requests submitted to addresses other than the address specified herein.

If you are a resident of California, under 18 and a registered user of the Services, you may ask us to remove content or information that you have posted to the Services by writing to info@TurtlesFlyToo.org. Please note that your request does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

How We Protect Information

TF2 uses a variety of security measures to protect your Personal Information. We employ appropriate and reasonable organizational, electronic, physical, administrative, and technical measures, including encryption, to help safeguard Personal Information from unauthorized access or disclosure.

When we work with other companies to process credit card transactions, those companies also use encryption and other appropriate security measures. However, no transmission or electronic storage of information can be completely secure. If you have reason to believe that your use of the Services or engagement with us is no longer secure, please immediately notify us as described in the **“Questions/Contact Information”** section below.



Retention Period

We retain Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Children's Privacy

This Website is not directed toward children under 13 years of age nor does TF2 knowingly collect information from children under 13, and we request that they do not submit any Personal Information through the Services.

Cross-Border Transfer

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

If you are located in the European Economic Area ("EEA"): Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard



contractual clauses adopted by the European Commission to protect your Personal Information. You may obtain a copy of these measures by following this link: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

Third Party Content and Links

Our Services may contain links to third-party websites, applications, or similar technology that are not associated with or over which TF2 has no control. Any access to and use of such linked websites is not governed by this Statement, but instead is governed by the privacy statements of those third-party websites. We are not responsible for the information practices or content of these other websites and/or applications.

We are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

Third Party Payment Service

We will use a third-party payment service to process payments made through the Services. If you wish to make a payment through the Services, your Personal Information will be collected by such third party and not by us and will be subject to the third party's privacy statement, rather than this Privacy Statement. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your Personal Information.

Sensitive Information

Unless explicitly requested, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.



Changes to This Privacy Statement

TF2 may, from time to time, amend this Privacy Statement. We will post any revisions to the Services, and we advise you to check back periodically. The “Effective Date” reference at the top of this page indicates when we last revised this Privacy Statement. Any changes to this Privacy Statement will become effective when we post the revised Privacy Statement on the Services. Your continued use of the Services or engagement in the Interactions after we implement such changes will also constitute your affirmative consent to the revised Privacy Statement.

Questions/Contact Information

If you have any questions, concerns, or suggestions regarding this Privacy Statement or our privacy practices, you may send us an email at info@TurtlesFlyToo.org, call our Member Care Team at (208) 484-7774 Monday through Friday between 9:00 am and 5:00 pm Central Time, or write us at:

Attn: Member Care Team
Turtles Fly Too
4911 No. Parkwood St.
Boise, ID 83704

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

Additional Information for Individuals in the EEA

If you are located in the EEA, you also may:

- Contact us at info@TurtlesFlyToo.org.
- Lodge a complaint with a data protection authority for your country or region, or where an alleged infringement of applicable data protection law occurs.

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