



Privacy Policy

MONTEFIORE HOME WEBSITE PRIVACY POLICY

Introduction

Montefiore Home and its affiliates respect your concerns about personal data protection and value our relationship with you. This Website Privacy Policy (the “Policy”) applies solely to personal data collected through Montefiore web sites, web pages, portals, interactive features, applications, telephone support lines, e-mail, widgets, blogs and their respective contents in addition to our Facebook or other social networking sites, and their respective contents (collectively, the “Website”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal data we collect through the Website and how that personal data may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your contact information, access and control the use of the personal data we collect in connection with our marketing communications and activities, or get answers to questions you may have about our privacy practices at the Website. Please read this Policy carefully, because by using the Website you are acknowledging that you understand and agree to the terms of this Policy.

Definitions

Except as otherwise defined in this Policy, capitalized terms have the meanings set forth herein.

“Identifiable natural person” means a person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

“Personal data” or “personal data” means any information about an identified or identifiable natural person.

Compliance with Local Laws

This Policy is meant to guide Montefiore with respect to personal data collected from or about you at this Website. While this Policy applies to personal data generally, the local laws, rules

and regulations of jurisdictions that are applicable to Montefiore (“Local Laws”) may require standards which are stricter than this Policy and, in such event; Montefiore will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

Collection and Use of Personal Data

The privacy and security of the personal data that Montefiore collects from you is a priority for Montefiore. Generally you can visit the Website without providing personal data, unless otherwise mentioned in the Website itself. However there may be circumstances when you may be asked or choose to provide personal data that could reasonably be used to contact you or to identify you personally such as your name, home address, telephone number, credit card data or e-mail address through the Website. By submitting personal data to Montefiore at this Website, you hereby consent to Montefiore’s collection, use and disclosure of such personal data.

Montefiore collects and uses personal data for the following purposes:

- Montefiore may collect and use personal data that you submit at our Website to communicate with you, better understand your needs, and to provide you with better service. For example, when you visit our websites, or send e-mails to Montefiore, you are communicating with us electronically and may be submitting personal data to Montefiore. We may use this personal data to communicate with you either electronically, by e-mail, or using other means.
- By way of example, Montefiore may collect and use personal data that you submit at our Website when you (1) register with Montefiore for an event, (2) make a donation to Montefiore, (3) register your e-mail address with us, (4) opt-in to receive newsletters, (5) send e-mail messages or feedback, submit forms or transmit other information by e-mail, (6) submit your credit card or other payment information when registering for an event or making a donation at our Website, or (7) complete a survey. If you elect to engage in such activities, we may ask that you provide us personal data, such as your first and last name, date of birth, age, mailing address (including zip code), e-mail address, telephone and facsimile numbers, credit card type and number, credit card security code, and other personal data. If you do not provide certain personal data with respect to a particular activity, you will not be able to engage in that activity.
- We may also use your personal data that you submit to provide you with a more efficient and customized experience, process your orders or event registration, improve our marketing and promotional efforts, statistically analyze Website use, improve our event and service offerings, contact you to solicit donations, and enhance our Website’s content, layout, and services. We may contact you regarding administrative notices and/or send you occasional e-mails or regular mail regarding our services, special offers and upcoming events that may be of interest

to you. If you do not wish to receive this information, please click on the “Unsubscribe” link shown on all our e-mails and electronic newsletters to you or contact us at the address or telephone number listed herein and we will remove your name from our mailing lists.

- To help Montefiore improve your experience on our Website Montefiore may also track your use of our Website. We may collect certain non-personally identifiable information about you based upon how you search and interact with our Website, including which pages you view while visiting our Website. For system administration and statistical analysis purposes, this information is compiled and analyzed on both a personal and an aggregated basis. This information may include a website’s Uniform Resource Locator (“URL”) that you just came from, which URL you next go to, general geographic location, device type, what browser you are using, Internet service provider, date/time of visit information, operating system, and your Internet Protocol (“IP”) address, which tells us the country and state you are searching our Website from. A URL is the global address of documents and other resources on the World Wide Web.
- We may also use your personal data that you submit at our Website to update your profile information on our off line database.
- We also collect, or enlist a third party service provider to collect, store, process and manage certain non-personally identifiable information to diagnose problems with our servers and software, administer our Website, connect you to the credit card payment platform and gather and analyze demographic and other statistical information. Our third party service providers may also provide us with summary, but not individual, reports that will tell us how our Website is being used. We may also share such aggregate statistical and demographic information with select third parties, such as our partners; however, these reports do not contain any personal data.
- As you browse our Website, our servers may collect information about your visit. For example, to help us better serve you and improve our Website, we may monitor statistics such as how many people visit our Website, which pages people visit on our Website, and which browsers people use to visit our Website.

Montefiore also may use and disclose your personal data: (1) to the extent required to respond to a legal or ethical obligation, (2) to the extent necessary to meet national security, public interest or law enforcement obligations, and (3) to the extent expressly permitted by an applicable law, rule or regulation.

Of course, you may choose not to provide Montefiore with personal data. However, this choice may prevent Montefiore from providing you with the product, service, event, or other information you requested or that could be offered to you.

Montefiore may use your personal data as set forth in this Policy (or any other Montefiore policy, as applicable), and for any other purposes for which your consent is required under applicable law so long as Montefiore obtains your consent.

Additionally, where Montefiore is permitted to do so under applicable law, Montefiore may share your personal data with its affiliates, employees, contractors, volunteers, consultants and other parties who assist Montefiore including, without limitation, parties that provide information technology and data processing services to Montefiore with respect to the operation of its businesses.

Where Montefiore is permitted to do so under applicable law, Montefiore may transfer or provide your personal data to affiliates or third parties both in and outside of the nation where you reside.

Additionally, your personal data may be disclosed as required by applicable law, to comply with a court order, subpoena, warrant or other legal process, or where the personal data is publicly available (unless otherwise restricted by applicable law).

Cookies

Like many websites, Montefiore uses “cookies” and similar tools on the Website to improve its performance and enhance your user experience.

What are Cookies?

A cookie is a small text file which is placed on your Device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Certain cookies may contain personal data – for example, if you click to “remember me” when logging in, a cookie may store your username. Most cookies won’t collect personal data that identifies you, and will instead collect more general information, such as how users arrive at and use our Website, or a user’s general location.

What do we use Cookies for?

Montefiore may place cookies or similar files on your Device for security purposes, to tell us whether you have visited the Website before, to remember your language preferences, if you are new visitor or to otherwise facilitate site navigation, and to personalize your experience while visiting our Website. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our Website and pages visited. Cookies also 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 Website. Cookies may enhance your online experience by saving your preferences while you are visiting a particular Website. Overall, cookies help us provide you with a better Website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your Device or any information about you, other than the data you choose to share with us.

What kinds of Cookies do we use?

Generally, the cookies that are used on the Website can be broken down in to the following categories:

- Session Cookies - These cookies are used 'in-session' each time you visit and then expire when you leave a Website or shortly thereafter: they are not stored on your Device permanently, do not contain any personal data and help by minimizing the need to transfer personal data across the internet. These cookies can be deleted or you can refuse to allow their use, but this will hamper the performance and your experience in using the Websites. These cookies also take time stamps that record when you access a Website and when you leave a Website.
- Tracking Cookies - These cookies enable us to recognize repeat visitors to our Website. By matching an anonymous, randomly generated identifier, a tracking cookie keeps track of where a user of our Website came from, what search engine they may have used, what link they clicked on, what keyword they used and where they were in the world when they accessed a Website. By monitoring this data, we can make improvements to our Website.
- Persistent Cookies - This type of cookie is saved on your Device for a fixed period (sometimes for a few hours, sometimes for a year or longer) and is not deleted when the browser is closed. Persistent cookies are used where we need to remember who you are for more than one browsing session. For example, this type of cookie can be used to store your preferences, so that they are remembered for the next visit to a Website.
- Performance or Analytical Cookies - Performance cookies are used to analyze how the Website is used and to monitor its performance, which allows us to improve your experience in using the Website. These cookies help us to tailor the content of the Website to reflect what the Website users find most interesting and to identify when technical issues with the Website arises. We may also use this data to compile reports to help us to analyze how a Website is used, what the most common issues are and how we can improve the Website.

Can the Cookies be blocked?

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies.

However, please be aware that if you disable or reject cookies, some features and services on our Website may not work properly because we may not be able to recognize and associate you with your Montefiore account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

Instructions for blocking or allowing Cookies in Popular Web Browsing Software

Internet Explorer 7 and 8

Firefox

Google Chrome

Apple Safari
AboutCookies.org

Opting-out

Even after you have consented to Montefiore's collection and use of your personal data and submitted personal data to Montefiore at this Website, you may opt-out of having your personal data collected or used by Montefiore by contacting Montefiore. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any events or services you request. You may contact Montefiore by sending us a letter at:

Montefiore Home
1 David N Myers Pkwy
Beachwood, OH 44122
Attention: Privacy Officer

Or by e-mail to: ahyman@montefiorecare.org

Or by telephone at: (216) 360-9080

Or by facsimile at: (216) 910-2299

General Principles for the Processing of Personal Data

Personal data will be collected, stored, processed and transmitted in accordance with Montefiore's established policies and applicable federal, state, local and foreign laws, rules and regulations.

The principles of Montefiore with respect to the processing of personal data are as follows: (1) personal data will be processed fairly and lawfully, (2) personal data will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (3) personal data collected by Montefiore will be adequate, relevant, and not excessive in relation to the purposes for which it is collected, (4) personal data collected by Montefiore will be accurate and, where necessary, kept up to date to the best of our ability, and (5) personal data collected by Montefiore will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal data was collected.

If Montefiore engages in the processing of personal data for purposes other than those specified in this Policy, Montefiore will provide notice of these changes, the purposes for which the personal data will be used, and the recipients of personal data.

Transfers of Personal data

Montefiore may transfer your personal data in connection with a merger, consolidation, or reorganization of the assets of Montefiore or affiliates, or other transaction, or by way of assignment (whether by operation of law or otherwise) in connection with any such or similar transaction or in connection with the administration of a bankruptcy estate. However, your personal data will continue to be protected by any pre-existing privacy policy of Montefiore, unless you agree otherwise. Your personal data may become the property of the successor and, subject to your agreement, will be subject to the successor's privacy policies.

We do not sell any of your personal data (including your name, mailing address, or e-mail address) to any companies or third parties. We do provide some of our services through contractual arrangements with affiliates, service providers, volunteers, and other third parties that require us to share your personal data with them in order to deliver those services. For example, we must release your credit card information to the card-issuing bank to confirm payment for events and services purchased on this Website; release your address information to our mailing service to deliver letters; provide your name, phone number, or other contact information to volunteers that help with donation solicitation and events; and provide name and address to third parties that help us provide donor services. We require our service providers to adopt and post privacy policies consistent with this Policy.

Linking to and Privacy Policies of Third Party Sites

This Policy applies to information collected from this Website by Montefiore. Once you click on a link to another website (the "Linked Site"), you are no longer on this Website. This Policy does not apply to the content or privacy practices of any Linked Site. We encourage you to read the privacy statements of each and every website or Linked Site that collects personal data. You should contact advertisers, other websites or Linked Sites directly if you have any questions about their privacy policies or their use of the information they collect.

Security

Montefiore will take reasonable steps to protect the personal data in its possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction, and will take useful precautions with regard to the nature of the data and the risks of the processing, to preserve the security of the data and, in particular, prevent its alteration and damage or access by non-authorized third parties. Montefiore has put in place appropriate technical, physical, and organizational procedures and security measures to safeguard and secure the personal data from destruction, loss, alteration, unauthorized access or disclosure, or other forms of unauthorized or unlawful processing commensurate with the risks posed by the particular type of processing, the

nature of the personal data and in accordance with applicable law and applicable guidelines, and taking into consideration the cost of implementing such measures.

Accuracy

It is your responsibility to provide Montefiore with accurate personal data. Except as otherwise set forth in this Policy, Montefiore shall only use personal data in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, Montefiore shall take reasonable steps to ensure that personal data is accurate, complete, current and relevant to its intended use.

Access

Upon request by you, Montefiore will grant you reasonable access to your personal data. Except where your rights are limited by applicable law (e.g., where necessary to safeguard national security, defense, or public security, for the prevention and detection of crime, or to safeguard an important economic or financial interest of the nation in which you reside, the employee, or the rights and freedoms of others, for the purpose of scientific research or statistical purposes, provided that the data is not used for making decisions that relate to a particular individual), such access will include: (1) confirmation as to whether or not your personal data is being processed and, if so, information as to the purposes of the processing, the categories of personal data processed, and the recipients (or categories of recipients) of the personal data; (2) communication in intelligible form of the personal data undergoing processing and information as to its source; and (3) details of the logic involved in any automatic processing of the personal data. Montefiore will permit you to correct, amend or delete inaccurate or incomplete personal data, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Subject to the above, you may change any of the personal data you have provided to us on this by writing us at:

Montefiore Home
1 David N. Myers Pkwy
Beachwood, OH 44122,
Attention: Privacy Officer

...or by e-mail at ahyman@montefiorecare.org. Please include your name, address, and/or e-mail address when you contact us.

You may ask to have the information on your account deleted or removed; however, because we keep track of past transactions, you cannot delete information associated with past transactions on this Website. In addition, it may be impossible to completely delete your information without some residual information because of backups.

Compliance

Montefiore will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your personal data has been processed or disclosed in violation of this Policy, Montefiore encourages you to raise any concerns using the contact information provided in this Policy. Montefiore will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal data.

Changes to this Policy

This Policy may be amended from time to time, consistent with the requirements of applicable law. A notice will be posted by Montefiore on this Website when this Policy is changed.