**CRi Privacy Policy – Updated 3/9/2019**

Community Residences, Inc and its subsidiaries are committed to protecting the privacy and confidentiality of personal information we may collect. This Privacy Policy describes what information we collect from you, why we collect it and what we do with it.

This website it not designed for, or directed to, children under the age of 13 and we do not intentionally collect information about anyone under the age of 13 on this website.

**Note to residents of the European Union**: To comply with the requirements of the European General Data Protection Regulation (GDPR) for our European users, this Privacy Policy outlines the legal basis on which we process your personal information and provides other information required by the GDPR. Further country/region specific information for our European consumers and users is outlined in the “EU Specific Terms” section below.

**What Information do we collect?**

* Information that you provide to us such as your name, address, date of birth, telephone number, email address, details of the company you work for, payment information and any feedback you give to us, including by phone, email, mail, or when you communicate with us via social media.
* Information about whether or not you want to receive marketing communications from us.
* Information about your location.
* Information about any device you have used to access this website (such as your device’s make and model, browser or IP address) and also how you use this website, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.
* Your contact details and details of the emails and other electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication.
* Information from other sources such as specialist companies that provide customer information (like marketing and research companies and analytics providers), social media providers, as well as information that is publicly available.
* We also collect information on behalf of our clients and process personal information given to us by our clients pursuant to a written agreement with our clients.

**How We Collect Information**

We collect information in the following manner:

* Through our website in one of three ways: you may provide us with your personal information through surveys, job applications and inquiries; we may collect and store information about your visit to this website in collective or aggregated data that does not identify you specifically; or we may use cookies to collect information about you. Please see “About Cookies” for more information.
* You may provide us with personal information via telephone calls, emails or written correspondence.
* You may provide personal information in connection with a job application.
* Third party providers may provide CRi with your personal information.
* We may also collect personal information from you if you visit one of our offices (for example, if you sign in or are recorded on CCTV while visiting us, or you give us the registration details of your vehicle).
* Through your use of other websites operated by us.

**About Cookies**

Cookies are small files that are stored on your web browser, laptop or mobile device to help a particular system recognize you and the pages you visit in a website. Our websites use cookies and/or other similar technologies such as device-IDs, pixel tags or web beacons to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and can be used to manage a range of features and content as well as storing searches and presenting personalized content.

Our site uses cookies and similar technologies to distinguish you from other users of our site.  This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites.

**Our Use of cookies**

We use cookies for the following purposes:

* To improve the performance of our websites by understanding which parts work well, and which don’t.
* To deliver relevant online advertising to you both on our websites and elsewhere.  This is sometimes done by combining data that we already have about you with the data collected through Cookies.  These Cookies are placed by us and selected third parties and enable advertisements to be presented to you on our and third party websites.
* To measure how effective our online advertising and marketing communications are.
* To enable us to collect information about how you and other people use our websites, for example recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily. To improve your experience on our websites.

**What Cookies Do We Use?**

There are several types of cookies. We use the following cookies:

* **Strictly necessary cookies**. These are cookies that are required for the operation of our website.  They are necessary for the safety, security and integrity of the site.  For example they help support the structure of the pages that are displayed to you, help to improve navigation and allow you to return to pages you have previously visited. This type of Cookie only lasts for the duration of the time you are visiting the website. When you leave the website they are deleted automatically.
* **Performance cookies**or analytical cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. The data is aggregated and anonymized, which means we cannot identify you as an individual.
* **Functionality cookies**. These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).  These cookies will remain on your device until you choose to clear it.  If you choose to do this, you will need to enter your details each time you visit the site.
* **Targeting cookies**. These cookies will collect information about your browsing habits and allow us to show you adverts while you are browsing our site and other sites on the internet.  They are set by us or by carefully selected third parties.  They help us to understand the performance of our marketing activities and improve the relevance of the adverts that you see.
* **Scout® Product**. Our Scout® product used by our clients may collect information using cookies and web beacons (also known as clear GIFs) or other website technology. Web beacons are used in combination with cookies to gather information about how website visitors are using our client’s products.
* **Google Analytics**. CRi uses a tool called “Google Analytics” to collect information about the use of this site.

***Blocking or Restricting Cookies***

You can stop cookies being used on your device by activating the setting on your browser that allows you to block the deployment of all or some cookies. Please visit [www.allaboutcookies.org](http://www.allaboutcookies.org/) to find out how. Please note, if you use your browser settings to block cookies you may not be able to access all or parts of our website.

**How We Use Personal Information**

We may use your personal information in the following ways:

* **To improve our website.**We use the information we collect through our website to help make our website more useful to you.
* **To maintain accurate accounts. We may use information we collect through our website to help maintain accurate accounts.**
* **To provide our services**– we need to use your personal information to make our products and services available to you and to notify you of any changes to our products and services.
* **For safety and security**– we use your personal information to help provide safe and secure environments for our employees to work in. To enable this, if you visit one of our facilities, we will collect personal information (including CCTV) to ensure a secure environment.
* **Contacting you**– we use your personal information to contact you about products and services from us and with your prior consent other companies. We may also contact you in relation to any questions you have raised with us.
* **To administer our website.**To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

**With Whom Might We Share Your Information?**

*Our service providers*. We work with partners, suppliers/vendors, professional advisers and agencies so that they can help us provide our products and services. These third parties process your personal information on our behalf and are required to meet our high standards of security before doing so. We only share information that allows them to provide their services to us or to facilitate them providing their services to you. These third parties include:

* Advertising companies, who help us place our advertisements online.
* Our agents, advisers or others involved in managing accounts and services for you and your business or collecting what you or your business owe us.
* Market research partners, who help us to analyze website user behavior.
* Social media providers – such as Facebook, Instagram and Twitter – where we interact with you on social media.
* Third party vendors who help us to manage and maintain our IT infrastructure;
* Providers of temporary staff, who need access to certain personal information to carry out their role within the business.
* Where relevant, our professional advisors, such as lawyers and consultants.
* Companies that deploy email campaigns for us.
* Companies that provide insights and analytics services for us so we can send the right marketing campaigns and understand our business and clients better.
* Security and fraud prevention companies to ensure the safety and security of our clients, colleagues and business.
* Companies that enable us to collect your reviews and comments, both online and offline.

We require the relevant businesses, partners, or agents to adhere to our policies regarding the use and protection of your personal information.

*Other organizations and individuals*. We may share your personal information in certain other scenarios. For example:

* If we’re discussing selling or transferring part or all of a CRi Group business, we may share information about you to prospective purchasers and their advisers – but only so they can evaluate the relevant business; or
* If we are reorganized or sold to another organization, we may transfer information we hold about you to them.
* If we are required to by law, under any code of practice by which we are bound or where we are asked to do so by a public or regulatory authority such as the police; or
* If we need to do so in order to exercise or protect our legal rights, users, systems and services.

**Choice**

You may choose not to provide us with your personal information. However, if you choose not to provide your personal information, you may not be able to enjoy the full use of this website. You may choose to “opt out” of our use of personal information you feel is incompatible with the purposes for which it was originally collected or authorized by you, by contacting us by email or by regular mail at the addresses shown in “Contact Us” below.

**Security**

CRi takes reasonable precautions to safeguard the personal information we collect from loss, misuse and unauthorized access, disclosure, alteration and destruction. No system can be completely secure and CRi does not guarantee that personal information will always remain secure.

Our website may from time to time contain links to external sites.  We are not responsible for the privacy policies or the content of such websites.

**Contact Us**

Please contact us with any questions, comments or concerns about this Privacy Policy, including how we use your personal information and how to exercise your rights with respect to your personal information at info@mycri.org

CRi - 14160 Newbrook Drive
Chantilly, VA 20151

Attn: Philanthropy Department

**Policy change**

This privacy policy was most recently updated on March 9, 2020. If changes are made, then we will take appropriate steps to bring those changes to your attention.

**EU Specific Terms**

The terms and conditions contained in this section – EU Specific Terms – applies only to the personal information of European Union residents we may process.

**EU-U.S. Privacy Shield**

CRi International, Inc. and its U.S. subsidiaries comply with the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield frameworks as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland to the United States. CRi has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and accordingly is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. CRi commits to cooperate with EU data protection authorities with regard to human resources data transferred from the EU in the context of the employment relationship. To learn more about the Privacy Shield program and to view our certification, please visit [Privacy Shield](https://www.privacyshield.gov/welcome).

Our accountability for personal information we receive under the Privacy Shield and subsequently transfer to a third party is described in the Privacy Shield Principles. If we contract with third parties to process personal information on our behalf and those third parties violate the Principles, we will remain responsible and liable under the Privacy Shield Principles unless we are not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information.  EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact CRi via email at info@mycri.org.

With respect to non-HR data, if you do not receive timely acknowledgement of your complaint from us or if we have not addressed your complaint to your satisfaction, please contact or visit JAMS at <https://www.jamsadr.com/eu-us-privacy-shield> for more information or to file a complaint. The services of JAMS are provided at no cost to you. As described in the Privacy Shield Principles, a binding arbitration option will be made available to you free of charge if your complaints are not addressed by other means.

With respect to HR data, we have further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.

**Where Do We Store Your Information?**

The data that we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers.

We may transfer your personal information outside the EEA:

* In order to store it.
* In order to enable us to provide services to and fulfill our contract with you or the company your work for.
* Where we are legally required to do so.
* In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

**How Long We Keep Your Information**

We will retain personal information for the period of time necessary to fulfill the purposes outlined in this policy unless a longer retention period of 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; whether there is a legal obligation to which we are subject; and whether the retention is advisable considering our legal position (such as, for example, statutes of limitations, litigation or regulatory investigations).

**Your Rights**

You have the right under certain circumstances:

* to be provided with a copy of your personal information held by us;
* to request the rectification or erasure of your personal information held by us;
* to request that we restrict the processing of your personal information (while we verify or investigate your concerns with this information, for example);
* to object to the further processing of your personal information, including the right to object to marketing;
* to request that your provided personal information be moved to a third party.

**Your Right to Withdraw Consent**

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us as set forth in the “Contact Us” section above.

**How to Exercise Your Rights**

You can also exercise the rights listed above at any time by contacting us at info@mycri.org.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see <http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html>).

**Lawful Basis for Processing**

CRi will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason(s) CRi collected and needs to use your personal information. The different legal bases we rely on are:

* Consent: You have told us you are happy for us to process your personal information for a specific purpose, such as when you request that we contact you with information about our services and products.
* Legitimate interests: The processing is necessary for us to conduct our business, but not where our interests are overridden by your rights or interests.
* Legal claims: The processing of your personal information is necessary for the establishment, exercise of defense of legal claims.
* Legal obligation: We are required to process your personal information by law.