

Pathways to Safety International Privacy Policy

Last Updated: October 2, 2017

Pathways to Safety International (“**we**” or “**us**”) is committed to protecting and respecting your privacy. We are registered in the State of Oregon, United States of America under company number 93-1281870 and have our mailing address in Oregon at 25 NW 23rd Place, PMB 461, Portland, Oregon 97210

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using our group within LiveSafe, Inc.’s mobile application (“**App**”), our website (“**Website**”), our telephone hotline (“**Hotline**”) and related services, via which we: (a) provide sexual assault prevention and response support; and (b) information relating to sexual assault and domestic violence, including safety planning, contact information for police, hospitals, and other resources (collectively, the “**Service**”), you are accepting and consenting to the practices described in this policy.

NOTE: If you use the App, LiveSafe will collect certain information from you, and such information will be subject to their separate privacy policy, which you should review carefully when installing the App and registering for an account.

The types of personal data we use

We may collect and use the following information about you:

- **Information you give us.** You may give us information about you by using the Service or by corresponding with us by phone, e-mail or otherwise. The information you give us is completely voluntary, but may include your name, address, email address, and telephone number. When using the App, you may choose for our communications to be fully anonymous, in which case we will not gather any personal data from you.
- **Information we collect about you.** We may automatically collect certain data from you, including IP address or other unique device identifiers, Cookies (as defined below), mobile carrier, time zone setting, operating system and platform and information regarding your use of the Service.
- **Location data.** When you use the Service on a mobile device, we may process information about your location, if activated on your mobile device, by use of a Global Positioning System (GPS). We may use this information to provide you with certain location-based services. If you do not wish to share your location with us, you can switch off GPS functionality on your mobile device.

Cookies

We use cookies and other similar technologies (e.g., web beacons, Flash cookies, etc.) (“**Cookies**”) to enhance your experience using the Service. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality.

We use the following Cookies:

- **Strictly necessary Cookies.** These are Cookies that are required for the operation of the Service. They include, for example, Cookies that enable you to log into secure areas of the Service.
- **Analytical/performance Cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around the Service when they are using it. This helps us to improve

the way the Service works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality Cookies.** These are used to recognise you when you return to the Service. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).

If for any reason you wish to not take advantage of Cookies, you may disable Cookies by changing the settings on your browser. However, if you do so, this will affect your enjoyment of the Service and we may no longer be able to offer you personalised content. Unless you opt out of Cookies, we will assume you consent to the use of Cookies.

Google Analytics

We also use Google Analytics, which includes a tracking token, and may use other technologies in the future, for similar purposes. These monitoring tools collect information anonymously and report Website trends to us without identifying individual visitors. This information can be combined with the information you have generated and transmitted to or through us or provided to us, which will enable us to analyze and improve the Website. Google's ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the [Google Analytics Terms of Service](#) and the [Google Privacy Policy](#). If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-out Browser Add-on available [here](#).

How we use your personal data

We will use the information in the following ways:

- In accordance with our contract with you, we may use your information to:
 - notify you about changes to our service;
 - provide you with user support;
 - enforce our terms, conditions and policies; or
 - communicate with you.
- As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our Service and organisation, we may use your information to:
 - improve the Service and to ensure content from the Service is presented in the most effective manner for you and your device;
 - administer the Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - allow you to participate in interactive features of the Service, when you choose to do so;
 - personalise the content you receive;
 - keep the Service safe and secure; and
 - develop our Service.

How we share your personal data

We may share your personal data with selected third parties, including:

- our third party service providers and subcontractors who help us run the Service;
- analytics and search engine providers that assist us in the improvement and optimisation of the Platform.

We may share your information if you give us your written or oral permission to do so. We may also share with law enforcement agencies, public authorities or other organisations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with legal obligation, process or request;
- enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law.

Where we store your personal data

The information that we collect from you may be transferred to, and stored at, a destination outside of your country and the European Economic Area (“**EEA**”). It may also be processed by staff operating outside your country or the EEA who work for us, for one of our suppliers or one of our business partners. By submitting your information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this policy.

The security of your personal data

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Service; any transmission is at your own risk.

Data retention

We will retain your information for a period of thirty (30) days following the date that we receive such information. However, the registration data you submit to LiveSafe will be subject to their privacy policy, and may be stored for a longer period of time.

After you have terminated your use of our services, we may store your information in an aggregated and anonymised format, including for statistical purposes.

Information relating to children

The Service is not directed at children under the age of 16 unless we have their parent(s)’ or legal guardian(s)’ consent. If we become aware that personal data has been collected from a person under the age of 16 without their parent(s)’ or legal guardian(s)’ consent, we will delete this information and close the person’s account. If you believe that we may have personal data about or collected from a child under the age of 16, please contact us at info@pathwaystosafety.org.

Your rights

- **Data rights.** You have the right to access information we hold about you, to rectify any personal data held about you that is inaccurate, to receive a copy of the data we hold about you in a

structured, commonly-used and machine readable format, and to request the deletion of personal data held about you. You can exercise your rights by contacting us at info@pathwaystosafety.org.

- **Complaints.** In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at info@pathwaystosafety.org and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with your data protection authority.

Changes

Any changes we may make to this Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this policy. If we make any material changes to this Privacy Policy, we will post the updated Privacy Policy here and notify our users.

Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to info@pathwaystosafety.org.