



## **Privacy Policies & Terms of Use**

### **Challenge America Terms & Conditions**

#### **Web Terms and Conditions**

Last modified on November 6, 2018

Challenge America is a nonprofit organization with the mission of connecting veterans, service members and their families to resources and solutions that build community and give purpose to their lives. The goal of this website, [www.challengeamerica.com](http://www.challengeamerica.com) (the "Site" or "Website"), is to provide a source of information to our clients, their families, and the general public on issues of relevance to the Military community (active duty, veterans and their families). The information that is found on the Site is based on professional advice, published research and expert opinion, but does not represent therapeutic recommendation or prescription. Challenge America strives to provide useful, up-to-date information on matters of concern to the Military community. The material is intended for general information purposes only, and it does not constitute medical advice. Those affiliated with the Site and Challenge America cannot be held responsible for any unintentional errors in the writing of this website or changes in information that may occur, possibly affecting certain details of an explanation, assumption, or treatment. Challenge America does not endorse nor recommend products, services or items that appear on this website.

By browsing or using the Site, you agree to comply with and be bound by the Terms, which, together with our [Privacy Policies](#), govern Challenge America's relationship with you as it relates to your use of this Site.

Challenge America reserves the right to change or modify the Terms at any time without notice and at its sole discretion. Any changes or modification will be effective immediately upon posting of the revisions on the Site. Your continued use of the Site following the posting of changes or modifications will constitute your acceptance of such changes or modifications. Therefore, you should periodically review these Terms. If you do not agree to these Terms at any time, you must stop using the Site. If you have any questions about these Terms, please contact us at [info@challengeamerica.com](mailto:info@challengeamerica.com)

#### **Copyright and Limited License**

The entire content and design of the Site are protected under U.S. and international copyright laws. The Site is owned and operated by Challenge America and unless specifically stated or otherwise indicated, all content, including, but not limited to, trademarks, logos, trade names, text, data, messages, pictures, images, video, audio, graphics, buttons, data compilations, icons, code, links or other electronic files or things that can be uploaded, downloaded, copied from, or posted on the internet (referred to hereafter as "Content") on the Site is the property of Challenge America and protected by intellectual property laws.



The Site is for your own personal noncommercial use. You may download materials for personal use only. You may not modify, distribute, transmit, display or publish any materials contained on the Site without the prior written permission of Challenge America or the appropriate copyright owner. Please refer to the copyright notices for more information.

Content owned by third parties may also appear on the Site, and you should respect those property rights as well. Content owned by third parties available on the Site is used by Challenge America pursuant to a license from a third party. Your use of this Content must comply with the terms of that license.

Challenge America does not represent that the content provided on the Site is completely accurate or error free, and therefore any reliance on the Content is done so at your own risk. Any use of the Site or its Content other than the uses allowed in these Terms of Use, including but not limited to other non-private, commercial purposes, is prohibited.

Any use of, or posting any Content on, the Site that could destroy, damage or impair any portion of the Site or any computer systems, hardware or software used by us or other visitors to the Site, is prohibited.

Certain portions of the Site are password protected and may only be accessed by authorized users with a valid login and password. Any attempt to gain unauthorized access to the Site or its Content, or any computers, systems, hardware or software used by us or other visitors to the Site, through hacking or other similar means, is prohibited.

Do not attempt to hack into, or bypass any security features of the Site or any Challenge America computers, servers, systems, hardware or software.

The Site is funded through various grants, donations and fundraising events. Challenge America does not have or accept any paid links or advertising on the Site.

### **Cookies**

We use cookies (small files that are sent to your web browser and stored on your computer's hard drive to improve your website experience). The cookie is used to speed up your access to the website and the information you wish to see, but it does not contain any personal information. When you log on to our website our web server automatically records domain name and standard information about the operating system and web browser. To track your progress through the site and help us evaluate usage of the site, the server places a "cookie," a small text file with an identification number, on your machine. This automatically collected information is used for statistical purposes to help us manage our site.

Our site uses cookies to identify end users based on their visit our website and/or other sites on the Internet. We also use cookies to analyze website traffic and performance.

### **Opting-Out**



The majority of web browsers accept cookies but the “help” menu on your browser should give you options for preventing and accepting or receiving notice of new cookies. However, please be aware that if you block cookies, some website functionality may be lost. After gathering any user information, Challenge America offers users the opportunity to remove their information from our active database so as not to further communication and/or to no longer interact with its website.

Individual site visitors who wish to review their personal information gathered by Challenge America, request corrections, or inform Challenge America that he/she does not wish his/her personal information to be shared outside this organization can contact Challenge America at [info@challengeamerica.com](mailto:info@challengeamerica.com).

### **Copyright Infringement**

If you believe that any Content on the Site infringes your copyright and you want the Content removed from the Site, please send a detailed message to:

Designated Copyright Agent:

Challenge America, IT Department, PO Box 4467, Basalt, CO 81621

Under the Digital Millennium Copyright Act, the following information must be included in the message:

- A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works on that site.
- Identification of the materials that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit the service provider to locate the material.
- Information reasonably sufficient to permit the service provider to contact the complaining party, such as an address, telephone number, and, if available, and electronic mail address at which the complaining party may be contacted.
- A statement that the complaining party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.
- A statement that the information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

### **Other Intellectual Property Infringement**

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[www.challengeamerica.com](http://www.challengeamerica.com)



If you believe that any Content on the Site violates or infringes your intellectual property rights other than copyright claims referenced in the previous section, please send a detailed email to [info@challengeamerica.com](mailto:info@challengeamerica.com) detailing your allegation or complaint. Challenge America takes infringement of a party's intellectual property rights very seriously and will investigate the matter accordingly.

### **Link Policy**

The Site may contain links to other sites. Challenge America is not responsible for the content or accuracy of the information, or the privacy practices of these sites. You should review the privacy policy of these sites to learn more about what and how they collect and use personal identification information. All websites who wish to link to challengeamerica.com must be reviewed by Challenge America and in some way represent Challenge America's mission to put our military community first. If you are interested in linking to Challenge America's website, please contact our webmaster at [info@challengeamerica.com](mailto:info@challengeamerica.com). Challenge America reserves the right to determine which links to provide on the website as well as the right to terminate links at any time. Challenge America does not have or accept any paid links or advertising to its website.

### **Acceptance of These Terms**

By using our website, you consent to the collection and use of this information by Challenge America. If we decide to change these Terms of Use or the privacy policy therein, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

### **Challenge America Privacy Policies**

Last modified November 6, 2018

This document describes how Challenge America respects privacy and the use of information collected in regard to the veterans, services members and families we serve, financial supporters of our mission and general visitors to our website.

If you have comments or questions regarding this notice, please feel free to contact us at [info@challengeamerica.com](mailto:info@challengeamerica.com)

### **General User Privacy Policy**

This privacy policy applies to general users of the Challenge America website and describes how Challenge America protects the information you provide when you use this website.

Although elements of this general policy apply to the veterans, service members and families we serve, and our donors who visit the website, we do collect additional data from these groups. Veterans and service members who apply to take part in various programs and initiatives can find additional information about how we use their information in our Program



Participation Privacy Policy. Donors and supporters can find additional information in our Donor Privacy Policy. Both policies are included below.

### **Data Collection**

Challenge America collects contact and other information from website visitors only when they have voluntarily provided these details to Challenge America. While on Challenge America's websites, individuals may provide their information by registering as a website user, registering for an event, purchasing tickets for an event, completing a survey, sending an email inquiry to Challenge America, making an online contribution, contributing to an online event, and other online activities.

The site uses an SSL (Secure Sockets Layer) as our generally accepted standard security technology for encrypting information submitted via online forms of all types (donations, registrations, surveys, and any other transactions that include personally identifiable information) before being transmitted. This certificate-verified encryption is in place to make it difficult for unauthorized entities to view submitted information traveling between computers or devices.

Our Site collects data related to targeted advertising and the behavior demonstrated by end users on advertiser websites. Data is converted into obfuscated audience lists from which individual identities cannot be determined by Third-Party vendors. Specifically, collected data is cookie data, which our/the DSP platform processes, creating audiences and attributing actions to specific ad campaigns. Data is stored in vetted third-party platforms, which facilitate the collection of this data through secured tags. These platforms all conform to necessary data privacy laws and allow for the exercising of all rights of data subjects. Lastly, platforms that allow for user-level tracking do so only through data gathered with proper consent and obscure any form of user identification.

### **Data Use**

Information collected via our website is used in a manner that is appropriate to the basis on which the data was collected. For example, your personal information may be used to reply to inquiries you send to us. Challenge America generally responds to requests via United States Postal Service mail, email, or telephone, depending on the type of material requested. It may also be used to handle donations or other transactions you initiate. And when you have specifically agreed to this, to send you marketing communications relating to our work we think may be of interest to you. For instance, people may be contacted via mail, email, or phone to be informed of breaking news, local and regional events, programs and services they may be of benefit, requests to share information through surveys, and to inform individuals when vital

information is published. Additionally, fundraising and contribution opportunities are also communicated to enable those who are interested in helping to support Challenge America's critical mission of connecting veterans, service members and their families to resources and solutions that build community and give their lives a sense of purpose.



Please note that individuals may opt to have their personal information removed at any time. To do so, please email: [info@challengeamerica.com](mailto:info@challengeamerica.com).

Please note that the deletion of your data will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

Challenge America uses vendor Salesforce for online constituent record management and transaction data. Salesforce's Non-Profit Starter Pack solution and other applications are PCI DSS and PA-DSS compliant. The provider has implemented PCI standards regarding secure storage of data, strong access control, and other requirements. For more details, please visit <https://scdp.salesforce.com/>

### **Sharing of Data**

We will only share your data with third parties in the following circumstances: you have provided your explicit consent to do so; we are using a third party purely for the purpose of processing data on our behalf and have an agreement in place that fulfills our legal obligations; or, we are required by law to share your data.

### **Donor Privacy Policy**

#### **Donor Rights**

Challenge America adheres to the Donor Bill of Rights, created by the American Association of Fund Raising Counsel ((AAFCR), the Association for Healthcare Philanthropy (AHP), the Association of Fundraising Professionals (AFP), and the Council for Advancement and Support of Education (CASE). The full text of the Donor Bill of Rights can be found at [www.afpnet.org/Ethics/content.cfm?ItemNumber=3094&navItemNumber=537](http://www.afpnet.org/Ethics/content.cfm?ItemNumber=3094&navItemNumber=537)

#### **Donor Bill of Rights**

*As published by the Association of Fundraising Professionals at [www.afpnet.org](http://www.afpnet.org):*

Philanthropy is based on voluntary actions for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To ensure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the nonprofits organizations and causes they are asked to support, we declare that all donors have these rights:

- To be informed of the organization's mission, of the way the organization intends to use donated resources, and its capacity to use donations effectively for their intended purposed.
- To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.
- To have access to the organization's most recent financial statements.
- To be assured their gifts will be used for the purposes for which they were given.

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- To receive appropriate acknowledgement and recognition.
- To be assured that information about their donation is handled with respect and with confidentiality to the extent provided by law.
- To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
- To be informed whether those seeking donations are volunteers, employees of the organization, or hired solicitors.
- To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.
- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

### **Security of Donation**

If you are making a donation to Challenge America online, you will be directed to a secure website where you can make a donation to Challenge America via credit card. Challenge America will not be sharing this information you provide with any outside parties. All donations made online will only be handled by those who are either contracted by Challenge America or are members of the internal staff. We have put in place appropriate physical, electronic and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online.

Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed in a manner that is inconsistent with this privacy notice. Inadvertent disclosures may result, for example, when third parties misrepresent their identities in asking the site for access to personally identifiable information about themselves for purposes of correcting possible factual errors in data.

### **Disclosure of Funding Sources**

Challenge America's site, [challengeamerica.com](http://challengeamerica.com), is funded through various grants, sponsorships, events, and donations from private and corporate donors. Challenge America does not have or accept any paid links or advertising on the Site. Challenge America determines all editorial content on the site and does not recommend or endorse any specific products, no external company has any influence on the editorial content.

For more information or to make adjustments to your contact information or other specifics provided to Challenge America, please contact Challenge America's Donor Relations via [info@challengeamerica.com](mailto:info@challengeamerica.com) or via phone at (970) 279-1323.

### **Program Participant Privacy Policy**

This Program Participant Privacy Policy applies to veterans, service members and their family member who register for Challenge America programs. If you register for our programs, we use





industry-standard safeguards to protect your data, including firewalls, physical safeguards, and encryption.

This policy describes how Challenge America protects information provided in conjunction with their registration with, and applies regardless of whether the registration occurred online, over the phone, or in person. It is our goal that you fully understand how we collect information, how we use that information, and the steps we've taken to protect that information.

### **What type of information does Challenge America collect?**

Challenge America collects different information depending on the program and your role in that program.

As a program attendee we may ask you for your service information, such as your branch, rank, and service dates. We will also ask for your contact information, such as name, email address, telephone number, and mailing address. We collect this information when you register either online through our website, in person with a Challenge America staff member, or over the phone.

We will also ask other identifying information, such as date of birth, gender, and type and location of your injury.

Once you are registered as a participant, depending on the program, we may ask you for additional information. This may include questions about your individual hobbies and interests, basic financial information, basic physical and mental fitness details, and other information that may be relevant to the particular program you are interested in. While you are not required to provide this information, your ability to participate in specific programs may be impacted if we do not have the necessary relevant information.

### **How does Challenge America use the information we collect?**

Generally, we use this information to tailor our programs to fit your needs.

We will use your contact information and other information that we collect for the following reasons:

- For internal record keeping, reporting, and data analysis;
- To communicate with you to obtain your input and provide information about our programs and services;
- To improve our programs and services;
- To customize our website according to your interests;
- To share information with third parties who help us deliver our programs;
- To share information with third parties who deliver their own programs and services for the military community;
- As required by law, or as part of a legal process.



**Do you share my information?**

Challenge America shares your information only as discussed above. We will not share your information with a third party that does not provide services (or help us provide services), or for purposes of adding you to a mailing list. We will never sell or rent your personal information for profit.

**Information security**

We have put in place physical, electronic, and managerial procedures to safeguard and secure the information we collect. Records containing personal information are stored at secure facilities; our websites use SSL (a tool used to verify the legitimacy of a website); and we train our employees on how to treat your data securely. Additionally, when Challenge America shares your information with third parties, we take reasonable steps to ensure that third party has sufficient safeguards in place to protect your information.

Data collected from program participants will be sent to a link at FormAssembly.com where data will be stored in a password protected electronic format. We do not give out, exchange, barter, rent, sell, lend, or disseminate any information about applicants applying to our programs that is considered client confidential, is restricted by law, or has been specifically restricted by a client in a signed HIPAA consent form. No names or identifying information will be included in any presentations or shared documentation, and participant data will remain confidential, unless participants give their signed consent indicating otherwise.