#### **SROA WEBSITE PRIVACY POLICY**

This Privacy Policy describes how The Sunriver Owners Association, an Oregon non-profit corporation ("SROA," "us," "our," or "we") collects, uses, and protects your personal information when you use or access our website, currently located at: www.sunriverowners.org (the "Site"), and the services we offer (collectively with the Site, our "Services"). This Privacy Policy also describes how we share certain information with third parties and what you can do to control the use, collection, and sharing of your personal information. This Privacy Policy applies to all use or access of our Services and all information provided to us (whether by phone, email, or through any input field on our Site), but does not apply to third parties' sites or services that may be linked to or otherwise available through our Site or Services.

#### 1. Information SROA Collects.

When you submit information to SROA, or otherwise correspond with SROA, SROA receives and information, which may include personal information. Personal information includes any information that could reasonably be used to personally identify you, including information you provide to us when using our Services (*e.g.*, your name, email address, your user account, social media account information, phone number, or location).

We may employ clear gifs (also known as web beacons) on our Site, which are used to anonymously track the online usage patterns of our users. We may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. This information allows for more accurate reporting and improvement of our Services.

When you visit our Site or otherwise use our Services, we also automatically receive and record certain information that your web browser provides, such as: your web request, IP address, browser type, browser language, referring/exit pages and URLs, platform type, domain names, type of device and operating system, pages, and information about your usage and interaction with our Services. In addition, SROA may use "cookies" (session ID or persistent) or similar technologies to record session identification such as browser type, pages, and information about your use and interaction with our Services. Please note that if you disable cookies in your browser settings, you may not be able to use all of our Services' features. You have the ability to manage or disable the use of cookies from Google Analytics by downloading the Google Analytics Opt-out add-on through the Google Chrome Web Store. Notwithstanding any of the foregoing, the use of cookies by our partners, affiliates, tracking utility company, and/or third-party service providers is not covered by our Privacy Policy. We do not have access or control over how these third parties collect, store and utilize cookies.

Our Site may also use third-party services, such as Google Analytics by Google, Inc., permit single signon functions with various social media platforms (FaceBook, Instagram, etc.), or allow you to use such social media platforms in connection with our Site or Services. If you use those services or platforms, we may collect personal information that you make available to us, including, without limitation, your profile and account information.

The cookies and other technologies used by third parties may collect personal information. We use information provided by third party services to help us understand the flow of web traffic to and from our Site and to better understand how individuals use our Site and our Services. The information generated by third party services will be transmitted to and stored by the applicable third party and subject to their respective privacy policies.

Our Site may allow payment by for certain fees. If you make a payment by credit card, that information is collected, processed, and used by our third party service provider. SROA will not store or process any

credit card information. Any payment and credit card processing will be conducted by a third-party service and subject to its terms.

## 2. How SROA Uses Your Personal Information.

We use the information we collect to contact you, to allow you to interact with our Services, to improve the content or functionality of our Services, to provide you with information you specifically request, to provide customer support, updates, and customer service, to contact you regarding new services, or upcoming events, and to comply with legal requirements. The non-identifying information that we collect may be used to improve our Services by providing us information about the number of users, the types of technology used, and to detect any problems with how our Services work.

## 3. How SROA May Share Your Personal Information.

We may share the information you provide us with our agents and service providers that perform certain functions related to our Services on our behalf, including, without limitation, our service providers that store information on our behalf, and service providers that send communications or newsletters on our behalf. We may also share information with third-party business affiliates. SROA is not responsible for these third-party's privacy policies and practices. SROA will advise you of the third-party business affiliates we share your information with, and we encourage you to familiarize yourself with any third-party provider's practices and policies before using their products or services. We may also share non-personally identifiable information (or de-identified information) in bulk with advertising, marketing, or other partners, if any, for analysis of our Services. We may use this anonymous and aggregate analytics information to create reports on usage trends and efficiency metrics.

Except as provided in this Privacy Policy, we will not sell, rent, swap, or authorize any third party to use your email address or other personal information without your permission. Notwithstanding, we will disclose your personal information when we are required to do so by law or believe in good faith that such disclosures are required to: (1) comply with the law or with legal process; (2) enforce any legal agreements between you and us, including without limitation, our Terms of Service for your use of our Services; (3) protect your safety or security; (4) protect the safety or security of SROA, our Site, our Services, our property, and our employees; or (5) protect the safety or security of third parties. Among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions. In the event that we ever merge with or are acquired by another company, we may transfer your information to that company.

# 4. Changing, Correcting, or Updating Your Information.

You can obtain access to the personal information we currently have on file for you and/or correct inaccuracies in such personal information by making a written request to SROA by mail or email to the addresses contained in the "Contact Us" section below. Some of our Services may allow you to update your personal information through your user account. We will correct or remove inaccurate information as requested as long as we do not need to retain the information for legitimate business or legal purposes. We also reserve the right to verify whether the information is correct. For your protection, you may be asked to provide additional information to verify your identity before being granted access to your personal information. You may be able to opt-out of the cookies delivered by our Site by changing the settings on your internet browser. Disabling cookies, however, may substantially limit your ability to interact or access our Services. You may also disable or block the geo-location function through your device settings. If you have questions about your device, please contact the manufacturer directly.

## 5. Children.

Our Services are not directed to individuals under the age of 13, and we do not knowingly collect personally identifiable information from children under age 13. If you are under age 13, you are not authorized to use or access our Services. If we discover that we have received any personal information from a child under the age of 13, we will delete that information immediately. If you believe we have any information from or about anyone under age 13, please contact us at the address listed below.

## 6. Our Email Policy.

SROA complies with applicable law and will not send you marketing messages if you have opted out or unsubscribed. We will not share, sell, rent, or authorize any third party to use your email address for commercial purposes without your permission.

SROA reserves the right, however, to send you email related to your account status and notifications about significant changes to this Privacy Policy. We will also use your email address to respond to any email from you. Please be aware that if you send us an email, the information disclosed in your email may not be secure. We suggest that you exercise caution if sending personal or confidential information to us via email.

## 7. How SROA Protects Your Information.

We protect the security of your information through use of commercially reasonable security features. We also use an SSL certificate for encryption when transmitting certain sensitive information. Of course, no security system is perfect and we do not guarantee that your information is absolutely safe or that information you transmit will not be intercepted.

Also, we restrict access to your personal information to our employees, agents, subcontractors, or other personnel who need to know that information in order to provide you the goods or services offered through our Products. We do not share, rent, or lease your personal information to third parties. Keep in mind, however, that our Products allow you to provide personal information directly to third parties. This Privacy Policy does not govern the security of personal information that you provide to third parties.

#### 8. Changes to this Policy.

Please visit this Privacy Policy from time to time. We reserve the right at any time to change any portion of this Privacy Policy. If we make changes to this policy, we will post an updated version with a new effective date. The posting of the amended policy is your notice of that change. If you do not agree to the updated terms, you are not authorized to use or access our Services.

#### 9. "Do-Not-Track" Signals.

We do not respond to browser-based "do not track" settings or signals at this time.

#### 10. Contact Us.

By phone: (541) 593-2411 By mail: infosroa@srowners.org

Last Updated: April 2020