

American Volkssport Association 1001 Pat Booker Road, Suite 101 Universal City, Texas 78148

AVA: America's Walking Club

DATE: May 13, 2017

TO: All AVA Club Officers

RE: AVA'S NEW PRIVACY POLICY AND PROCEDURES ON THE COLLECTION OF PERSONAL INFORMATION

Last June the National Executive Council of the AVA approved the creation of a Privacy Policy so certain personal data collected by the AVA could be shared with club presidents, state association presidents and Regional Directors and used only for dissemination of information related to AVA services and activities. A copy of this policy is attached.

The only information that will be released will be name, address, telephone number and email address. If an individual does not want any of this information shared she/he can opt out at any time by contacting Karen at the AVA National office or by sending an email notice that you do not want your information shared to optout@ava.org

Any AVA club personnel, Regional Director or staff member with access to this information must ensure it is properly safeguarded in accordance with the AVA Privacy Policy Procedures. If this information is misused by clubs it could result in termination of membership. A copy of these procedures is also attached.

Effective June 1, 2017 only a Regional Director and/or State or Club Association President may request personal information from the AVA National Office. To simplify the process all that is needed is an email request from one of these representatives with the following information:

- 1. Name and title of Requestor
- 2. Name of the club and club number the Requestor is associated with
- 3. Phone number of the Requestor
- 4. Date
- 5. A list of the States the Requestor is asking for individuals' information. (We will only send out info by States.)
- 6. The information request must be made from an email account on file in our ESR system. If the information is not sent from an AVA club or Regional Director account on file, the AVA reserves the right to hold the information until the requestor can be verified. A two weeks turn-around time for receipt of this information is appreciated.

Please see the AVA Privacy Policy for our information sharing practices located on our website, www.ava.org or contact Karen at the AVA office at 210-659-2112 with any questions.

Respectfully,

Henry Rosales Executive Director

AVA PRIVACY POLICY PROCEDURES

These policy procedures apply to any American Volkssport Association ("AVA") personnel or authorized representatives, including local, statewide or regional AVA club personnel with access to AVA personally identifiable member information. The AVA Executive Director has overall responsibility for ensuring that proper safeguards are in place and that these procedures are followed. It is the responsibility of any of these individuals to learn, understand and comply with these procedures. Failure to do so could result in a club or individual's expulsion from AVA membership or employment.

Personally identifiable member information (PIMI) must be collected in the method described in the AVA Privacy Policy and safeguarded in accordance with these procedures. PIMI may only be used for the purpose for which it was collected and intended and may not be shared without proper authorization from the member. (Member has not opted out.) PIMI is a combination of certain types of individual information from which the identity of a person can be determined. These types of information include a combination of two or more of any of the following:

- First and last name or first initial and last name;
- Physical Description;
- Ethnicity;
- Social Security Number;
- Driver's License Number or State Issued ID Card Number;
- Credit or Debit Card Number, regardless of whether any of the following are included with that number:
 - Expiration Date;
 - o CSV Code;
 - o PIN;
 - o Password; or
 - Access Code;
- Financial Account Number, in combination with any access code or password that would permit access to an individual's financial account;
- Mother's Maiden Name;
- · Date of Birth;
- Medical Information; or
- Passport Number.

PIMI should not be shared with any person or organization outside of AVA and should only be shared internally within AVA and its local, statewide or regional AVA club personnel as provided for and allowed by AVA's Privacy Policy. When such information is shared, it should be done so via encrypted or otherwise protected email or on paper documents that are shredded or stored in a locked file cabinet or area with restricted access. Any authorized individual accessing the PIMI housed in paper or electronic fashion will be responsible for securing that information by key or password prior to leaving that work area.

Any information maintained electronically must be maintained in a computer storage system that has current anti-virus and firewall or security software in place and is accessible only to individuals who need access in order to conduct the business of AVA. Security passwords should be in place on such computer system with each individual responsible for his or her own password. Passwords should not be shared.

Any information maintained in paper copies must be stored in a locked file cabinet or locked area with restricted access. When such information is no longer needed in paper form, the paper should be properly shredded and disposed of.

No PIMI should be copied to portable media devices, including USB fobs or external data saving devices, without prior written approval of the AVA Executive Director. No PIMI should ever be placed on an individual cell phone or other portable media device. Printing of PIMI should be done on a designated printer or a printer with password printing capability.

Local, statewide or regional AVA clubs and club personnel with access to PIMI because of information shared in accordance with the AVA Privacy Policy must not use any such information for any reason outside of the AVA Privacy Policy.

Any AVA personnel or authorize representative who is or becomes aware of a violation of these procedures is required to report such violation immediately to the AVA Executive Director.

American Volkssport Association Privacy Policy

This privacy policy discloses the privacy practices for the American Volkssport Association ("AVA"). AVA maintains its website at www.ava.org and a physical address at 1001 Pat Booker Road, Suite 101, Universal City, TX 78148. AVA can also be reached at the following numbers: Fax (210) 659-1212; Office (210) 659-2112.

This privacy policy applies to information collected by the AVA web site or any membership application or other material completed by you and provided to AVA or its authorized representatives electronically or otherwise. AVA will notify you of the following:

- What personally identifiable information is collected from you through our relationship with you, and how we may use or disclose that information.
- What choices are available to you regarding the use of your information.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.

Information Collection, Use, and Sharing

You may share certain information with us, including your name, address, telephone number, email address, credit card number or other personally identifiable information. Sharing that information will enable you to obtain membership, join email or newsletter subscriptions, share stories with us, make donations, pay membership fees or dues or purchase merchandise.

We are the sole owners of the information collected on our website or by email, fax, mail, applications or that you may otherwise provide to us or our authorized representatives. We only have access to and collect information that you voluntarily give us via our website or by email, fax, mail, your written application or other direct contact from you.

We may use your information to provide you with information related to AVA activities and services, including newsletters, solicitations for volunteers, donations, requests for your personal stories for us to share or to request your feedback. We may also use your information to fulfill orders or complete transactions.

We may share your name, address, telephone number and email address information with local, statewide or regional AVA clubs. We will not share your information with any third party outside of the organization. Your credit card information will never be shared.

Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline and collected via secure server. When you submit sensitive information via email, mail or any other method, your information is protected offline. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Cookies

AVA uses cookies on its website to improve its performance, to remember user preferences and settings and to collect analytic data. A cookie is a string of information that a website stores on your computer, and that your browser provides to the website each time you return.

Links

This web site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Your Access to and Control Over Information / Opting Out of Sharing

You may opt out of any future contacts from us or do any the following at any time by contacting us via the email address, optout@ava.org or contacting Membership Services at (210) 659-2112 between 8-5 CST Monday through Friday:

- See what information we have about you, if any.
- Change/correct any information we have about you.
- Have us delete any information we have about you.
- Express any concern you have about our use of your information.
- Designate any individual or club with which you do not want your information shared.
- Opt Out of having any of your information shared.

Updates

Our Privacy Policy may change from time to time and all updates will be posted on our website at www.ava.org.