

Last Updated October 1, 2024

MCL PRIVACY POLICY

The privacy policy is an extension of our commitment to integrity in managing interaction with visitors, members, donors, shoppers, and other partners. The policy is designed to assist in understanding how we collect, use, and safeguard the personal information you provide to us, and to assist you in making informed decisions when using our site and our products and services. This statement will be regularly assessed against new technologies, business practices, and our customers' needs.

The policy shall apply to all portions of the Marine Corps League Albert E Schwab Detachment #857 web site(s), (collectively and individually, hereinafter referred to as the "MCL web site," the "web site," or the "site.") Access to and use of the MCL web sites are available only to individuals who can form legally binding contracts under applicable law. If you do not qualify, you may not use the MCL web site. If you are a minor under the age of 15, you may use the MCL web site only in conjunction with your parent, legal guardian, or other responsible adult supervision. We urge supervising adults to actively oversee minors' on-line use.

COLLECTION OF INFORMATION

INFORMATION YOU PROVIDE TO US

- When you opt to create or modify your account and/or submit various financial transactions through the Marine Corps League Albert E Schwab Detachment 857 site you are asked to provide certain "Basic Registration Information" including your name, address, phone, current e-mail address, date of birth, service information, and other information you choose to provide. This information is submitted voluntarily.
- If you choose to correspond further with us through e-mail, we may retain the content of your e-mail messages together with your e-mail address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone.
- MCL may offer contests, promotional give-a-ways, special membership offers or surveys. Participation is completely voluntary, and the user therefore has a choice whether or not to disclose such information as user contact and demographic information. Information collected may be used to

contact participants of prize notification or for solicitation purposes to join/support the MCL.

INFORMATION WE COLLECT THROUGH YOUR USE OF OUR SERVICES

- Web site use information is collected through web site browser software tools, such as cookies and web server logs, on an aggregate basis as you and others browse our web site. Only aggregate data – such as the number of hits per page – are collected. Aggregate data are only used for internal and marketing purposes and do not provide any personally identifying information.
- Additionally for some e-mails sent in HTML format by MCL to its members, we will collect specific information regarding what the recipient does with the email. For these emails, MCL will monitor whether a recipient subsequently clicks through to links provided in the message. Other information collected through this tracking feature includes email address of a user, the date and time of the user’s “click”, the name of the list from which the message was sent, tracking URL number and destination page. MCL only uses this information to enhance its products and distribution of those products to its members, donors, shoppers, and other partners. This information is not sold or distributed in any other manner.
- This site may make chat rooms, forums, discussion boards, and/or news groups available to its users. Please remember that any information that is disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose your personal information. Your right to speak freely here must be exercised with courtesy and self-restraint. Entering a chat room or using a discussion board constitutes your acceptance of the terms and conditions of this site (TOS), including this policy, provided by MCL. If you do not agree to abide by these terms and conditions, please do not use these services.

COOKIE STATEMENT

- Cookies are files that contain information created by a web server that can be stored on a user’s hard disk for use either during a particular session (“per-session” cookie) or for future use (“persistent” cookie).
- Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that web site by the same user or to use the information to streamline the user’s transactions on related web pages. This makes it easier for a user to move from web page to web page

and to complete commercial transactions over the Internet. Cookies should make your on-line experience easier and more personalized.

- Cookies are not used to disseminate significant information about users over the Internet or to analyze any information that users have knowingly or unknowingly provided.
- Cookies help us to collect important business and technical statistics. The information in the cookies lets us trace the paths followed by users to our web site as they move from one page to another. Web server logs allow us to count how many people visit our web site and evaluate our web site's visitor capacity. We do not use these technologies to capture your individual e-mail address or any personally identifying information about you, although they do permit us and third-party vendors to send focused on-line banner advertisements or other such responses to you. See the OPT OUT section for details on how to Opt Out of cookies from Google and other third-party vendors.

USE OF INFORMATION WE COLLECT

- Broadly speaking, we use personal information for the purposes of administering our business activities, providing customer service, and making available other products and services to our customers and prospective customers. Occasionally, we may also use the information we collect to notify you about important changes to our web site, new products and services, and special events or offers we think you will find valuable.
- We may disclose information when legally compelled to do so—in other words, when we, in good faith, believe that the law requires it or for the protection of your, or our legal rights.
- The information collected through web site browser software tools assists us in designing and arranging our web pages in the most user-friendly manner and in continually improving our web site to better meet the needs of our customers and prospective customers.
- MCL is the sole owner of the information collected on this site. We reserve the right to share Member information with our affinity partners who may be given access to personal information including your name, mailing address, email, and/or phone number for the purpose of providing you with information regarding value added products and services that we think will be of interest to you. In connection with affinity partner alliances, we retain ownership rights to the information, and we will not share information regarding your personal financial data if the same has been collected. Please

see the Opt Out section for information on how to Opt Out from various MCL communications.

- We may exchange the names and addresses of our donors with other carefully selected Marine Corps affiliated organizations to build our base of support.
- MCL reserves the right to share personal information for all constituents with trusted third-party vendors that provide contracted service to MCL. These third-party vendors may be given access to personal information including your name, mailing address, email, and/or phone number solely for the purpose of providing contracted services to MCL. MCL retains ownership rights to the information, and we will not share personal financial data if the same has been collected. Please see Opt Out section for information on how to Opt Out from various MCL communications.
- From time to time, you may notice offers from MCL affinity partners endorsed on our web site. We take measures to select products or service providers that are reputable and have negotiated prices, products, services, and benefits with you, the member, being of paramount importance. However, we cannot make any representations about the practices and policies of these companies.
- Any email addresses provided through “Basic Registration Information” or through email correspondence may be used to contact you for other MCL solicitations unless you opt out of receiving these emails.
- If you use the MCL secure on-line server to order merchandise, we ask that you submit the information needed to process the order as requested on the order form. This information is encrypted during transit over the Internet. Our customer service department uses this information to ship your order and/or to contact you should a problem arise with your order. We do not use this information to notify you of other retail products or services unless you choose this option via a check box or similar device. The information provided may be used for solicitation purposes to join/support the MCL. If a membership is purchased, then information may also be shared with MCL affinity partners as indicated in this privacy policy.
- If you use the MCL secure on-line server to join MCL, donate to MCL, or register for an MCL event, we ask that you submit the information needed to process the order as requested on the order form. This information is encrypted during transit over the Internet and immediately forwarded to the appropriate MCL department. MCL uses this information to ship your magazine if applicable, to contact you should a problem arise with your membership/subscription, donation, or event registration, and/or to

otherwise follow up with you on your submission. The information provided may be used for solicitation purposes to support the MCL. Member information may also be shared with MCL affinity partners as indicated in this privacy policy.

HOW DO I OPT OUT?

- Third party vendors such as Google also use information gathered from cookies from the MCL website to provide ads on products and services that you may find valuable based on your browsing history. If you wish to Opt Out of Google's use of cookies you may do so by visiting Google's [Ads Settings](#). To Opt Out of third-party vendor's use of cookies, visit the [Network Advertising Initiative opt-out page](#).
- Users may also instruct their Internet browsers to opt out of accepting a "persistent" cookie and rather accept only a "per-session" cookie but will need to login each time they visit the MCL website to enjoy the full benefits.
- You may opt out of receiving email, mail, surveys, and/or telephone communications from MCL and/or our Affinity Partners on behalf of MCL either by contacting us by telephone, submitting an electronic communication through the Contact Us link on the MCL website.
- You may opt out of any donor/contact sharing by contacting us 539-777-1109 or by submitting an electronic communication through the Contact Us link on the MCL website.

ADDITIONAL INFORMATION

- We utilize encryption/security software to safeguard the confidentiality of personal information we collect. This software provides protection against unauthorized access or disclosure, as well as accidental loss, alteration, or destruction.
- We are not responsible for the practices employed by web sites linked to or from the MCL web site or for the information or content contained therein. Often links to other web sites are provided solely as pointers to information on topics that may be useful to the users of our web site.
- Please remember that when you use a link to go from our web site to another, our privacy policy is no longer in effect. Your browsing and interaction on any other web site, including those linked to our own, is subject to that web site's own rules and policies. Please read over those rules and policies when you visit those sites.

- We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. MCL follows industry information security standards including Payment Card Industry Data Security Standards in our business practices.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Inadvertent disclosures may result. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

CONSENT

By using our web site, you consent to our collection and use of your personal information as described in this privacy policy. If we change our privacy policies and procedures, we will attempt to post those changes on our web site to keep you aware of what information we collect, how we use it, and under what circumstances we may disclose it. By using our web site, you agree that MCL may immediately, without prior notice, issue a warning, temporarily suspend, indefinitely suspend, or terminate your use of and refuse to provide access to the MCL web sites at MCL's sole discretion, for any reason, whether with or without cause. You also acknowledge that MCL may, in its sole discretion add, delete, or change some of or the entire MCL site at any time.

Further, you expressly agree that use of the MCL web site is at your sole risk. The MCL web site is provided on an "as is" and "as available" basis. The MCL expressly disclaims all warranties of any kind, express or implied, including without limitation any warranty of merchantability, fitness for a particular purpose, or non-infringement.

All materials, content, trademarks, service marks, trade names, logos, and seals are proprietary to the Marine Corps League. No material from our site, unless it is in the public domain, may be copied, reproduced, republished, uploaded, posted, transmitted, or distributed in any way without express written permission from an authorized officer of the League.

New Privacy Policy Required for Android Apps

This privacy notice for Marine Corps League ("Company," "we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Download and use our mobile application Marine Corps League (MCL), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@MCLeague.org.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us. We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases. such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Paypal. You may find their privacy notice link(s) here: <https://www.paypal.com/myaccount/privacy/privacyhub>.

Application Data. If you use our application(s) we also may collect the following information if you choose to provide us with access or permission:

- *Geolocation Information.* We may request access or permission to track location-based information from your mobile device, while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, contacts, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected. We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your device characteristics, operating system, device name, device model and other technical information. This information is primarily needed for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Device Data.* We collect device data such as information about your phone, tablet you use to access the Services. Depending on the device used, this device data may include information such as your application identification numbers and system configuration information.
- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention; and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies. and other similar information.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information in specific situations described in this section and/or with the following third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("*third parties*") who perform services for us or on our behalf and require access to such information to do that work. They also commit to protect the data they hold on to our behalf and to retain it for the period we instruct.

The third parties we may share personal information with are as follows:

- **Web and Mobile Analytics** – Google Analytics for Firebase

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in

backup archives) then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organizational and technical security measures. We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we deem that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at admin@mcl857.org.

8. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

In certain situations, you may request to review, update, delete your personal information. To do so please submit a request to admin@mcl857.org.

Should you have additional questions, comments or concerns, please contact us at:

Our mailing address:

Marine Corps League – Albert E Schwab Detachment #857

PO Box 470816

Tulsa, OK 74147-0816

We can also be reached via e-mail at:

admin@mcl857.org