

# Privacy Policy

## Policy:

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Privacy is important to us, and maintaining trust and confidence is a high priority. STARS respects employees, clients and donors' right to keep personal information confidential and understands one's desire to avoid unwanted solicitations.

## Practice:

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### Types of Information We Collect

STARS collects certain personal information— but only when that information is provided by an employee or person served or is obtained by us with authorization.

Examples of sources from which we collect information include:

- interviews and phone calls,
- letters or e-mails,
- employee applications
- new-hire information
- reference, background or drug checks
- medical history (person's served by YODA)

### Parties to Whom We Disclose Information

As a general rule, we do not disclose personal information about our employees, clients, or former clients and employees to any third parties. However, to the extent permitted by law and any applicable state Code of Professional Conduct, certain nonpublic information about an employee or client may be disclosed in the following situations:

- To comply with a validly issued and enforceable subpoena or summons.
- In the course of a review under the authorization of a state or national licensing board, or as necessary to properly respond to an inquiry or complaint from such a licensing board of organization.
- In conjunction with a prospective purchase, sale, or merger of all or part of our agency, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser or merger partner does not disclose information obtained in the course of the review.

- As a part of any actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
- To provide information to affiliates of the firm and nonaffiliated third parties who perform services or functions for us in conjunction with our services to you, but only if we have a contractual agreement with the other party which prohibits them from disclosing or using the information other than for the purposes for which it was disclosed.

### **Confidentiality and Security of Nonpublic Personal Information**

Except as otherwise described in this notice, we restrict access to nonpublic personal information about an employee or client to employees of our company and other parties who must use that information to provide services to our employees or clients. Their right to further disclose and use the information is limited by the policies of our company, applicable law, our Standards of Business Conduct, and nondisclosure agreements where appropriate. We also maintain physical, electronic, and procedural safeguards in compliance with applicable laws and regulations to guard our employees and clients personal information from unauthorized access, alteration, or premature destruction.

Our information systems and supporting business procedures honor customer preferences concerning the opt-out of sharing non-public, personal information to non-affiliated third parties.

### **Donor Privacy Statement**

STARS is committed to protecting our donors' privacy. We collect, use and disclose a donor's personal information only for specific internal use. This includes: establishing and managing a relationship with a donor, providing information on STARS news and events, soliciting funds that help us reach our financial goals, and processing gifts and returning appropriate receipts. To publicly recognize and thank them for their generosity, we occasionally publish the names of our donors. All wishes to remain anonymous will be honored. Individuals who donate or volunteer their time to STARS and share with us their personal information may be added to future mailing lists, including an email lists. STARS will not sell, share or trade our donors' names or personal information with any other entity, nor send mailings to our donors on behalf of other organizations.