



# West Harlem Development Corporation

Solutions through collaborations™

## WEST HARLEM DEVELOPMENT CORPORATION (WHDC) PRIVACY & COOKIES NOTICE

Last updated January 6, 2022 [Update history](#)

### Privacy Policy

The WEST HARLEM DEVELOPMENT CORPORATION and our affiliates are committed to the lawful, fair, and transparent collection and use of personal data. This notice is intended to help you understand how we collect and use your personal data, as well as how we share, store, and protect that data. If at any time you have questions about this notice, please let us know by contacting us at the information listed below in the section titled, “How to contact us.”

We may update this notice and any supplemental privacy notices to reflect changes in our practices and applicable law.

### Cookies & Similar Technologies

This notice applies to personal data we collect, including through this website, or other website, mobile applications, online portals, electronic forms, surveys, interactive exhibits, and any other channel or mobile feature that we operate (collectively, “our sites”). In these instances, WHDC is the controller responsible for your personal data.

### Links to third-party sites

This notice does not apply to any third-party sites that may link to, or be accessible from, our sites. We are not responsible for any of the content, features, functionality, or privacy practices of other linked sites or services. The data collection and use practices of any linked third-party site will be governed by that third party’s applicable privacy notice, statement, or policy, and its terms of use. We encourage you to read them.

### What data we collect about you

#### Data you provide about yourself

We collect your personal data when you voluntarily provide it to us. For example, you may give us: your email address, country of residence, and areas of interest if you choose to receive newsletters, updates, or other information from us; your contact information, and any other personal data you choose to include, if you email, text, or instant message us, or contact us through our sites; and any personal data contained in, or included with, any proposal documents, feedback, comments, photos, videos, or other information you submit via online portals, forms, surveys, or interactive portions of our sites.

It is always your choice whether to provide this personal data. However, some personal data must be provided to participate in certain programs, activities, or events (such as to sign up for a newsletter, apply for a job, become a grantee or register to participate in one of our events), so the decision not to provide information might limit or eliminate such functions of our sites or your ability to participate in such programs, activities, or events. Please do not disclose more personal data than is requested.

### Personal data you provide about others

Do not provide personal data about others unless you are authorized or required to do so by contract or applicable law. You may provide personal data on behalf of another person if you have provided them with a copy of this notice and any applicable supplemental privacy notice, and obtained their explicit consent. We may ask you to provide evidence of that notice and consent.

### Data we receive from third parties and other sources

We may receive personal data about you from other sources, including your company/organization, professional references, publicly-available sources, third-party analytics providers, and other third parties. For example, we may receive your personal data if: someone at your company/organization designates you as a contact person for that company/organization or includes information about you in proposal; or one of our employees or service providers provides or a third party acting on apparent authority provides it to us when registering you to access our facilities or our sites, apply for a job, become a grantee or participate in one of our events.

### Data we collect automatically, including cookies, pixels, and similar technologies

We may collect some personal data automatically. For example, when you visit our sites, we may collect your Internet Protocol (“IP”) address, Internet service provider (“ISP”) information, and browser type and language. We also may use cookies, pixels, and similar technologies to collect data about your interaction with our sites, including, for example, referring webpage, pages visited on our sites, and crash data. In addition, we may link the information we collect automatically or the information from any cookie or pixel with the information you provide in other contexts on our sites (newsletters, etc.) to personalize, connect and streamline your experience when visiting our sites. For example, this may include connecting your use of our site from your desktop, mobile, or other device. Please see Cookies & Similar Technologies for more information, including how to manage cookies, pixels, and similar technologies.

### Minors

Our sites are not intended for minors (individuals under the age of 13, or equivalent minimum age depending on jurisdiction), and we do not knowingly collect personal data from minors. If you become aware of any personal data we have collected from a minor, please contact us. If we learn that we have collected personal data from a minor, we will take steps to delete the data without notice as soon as possible.

### How we use your data

#### Purposes

We may use your personal data to: send you information that you have expressly chosen to receive [with your consent]; review and respond to proposal documents, feedback, comments, photos, videos, or other information you submit via online portals, electronic forms, surveys, or interactive portions of our sites [for our legitimate interests and/or to perform a contract with you]; administer and inform our program strategies and charitable activities [for our legitimate interests]; administer, safeguard, and improve our sites, systems, facilities, events, and other business operations [for our legitimate interests]; protect our rights and the safety of others [for our legitimate interests]; contribute to our

archive of information in the public interest [for our legitimate interests]; and/or comply with applicable law, court order, subpoena, or legal process served on us [to comply with legal obligations].

## When we share your data

### Employees, agents, affiliates, service providers, and partners

We may share your personal data with our employees, agents, and affiliates who have a business need to know, our services providers (including contingent workers, consultants, contractors, vendors, and out-sourced service providers) to process it for us based on our instructions and for no other purpose, and with partners that are collaborating with us to fund projects or host events. We do not share your personal data with any third party (including our service providers) for marketing purposes unless you have provided consent for us to do so. If you believe personal data you provided to us is being misused by a third party, please contact us right away.

## How we store and protect your data

### Storage and transfers

Any data we collect from you, we store on secure servers and secure cloud based services that have a current and valid certification for ISO 27001 or SOC 2. We may also allow employees and service providers to access personal data as provided in this notice. We will also comply with applicable laws regarding the storage and transfer of personal data in jurisdictions where your personal data may be collected or provided.

### Storage period

We will store your personal data until it is no longer needed to fulfill the purpose(s) for which it was collected or as otherwise required or permitted by law. After such time, we will either delete or anonymize your personal data or, if this is not possible, we will securely store your personal data and isolate it from any further use until deletion is possible. We may dispose of any data in our discretion without notice, subject to applicable law. Please contact us if you would like more details regarding our retention periods for different categories of personal data.

### Protection

As the transmission of data via the internet is not completely secure, we cannot guarantee the security of your information transmitted to our sites and any such transmission is at your own risk. However, we maintain appropriate technical and organizational measures, including performing regular self-assessments, to prevent unauthorized disclosure of, or access to, personal data. We limit access to personal data and require that employees authorized to access personal data maintain the confidentiality of that data. We hold our service providers to at least the same data privacy and security standards to which we hold ourselves. Our standard information security requirements for service providers are available here.

## WEST HARLEM DEVELOPMENT CORPORATION SUPPLEMENTAL PRIVACY NOTICE FOR JOB APPLICANTS

This notice supplements our Privacy & Cookies Notice and describes how we collect, use, share, and retain additional personal data when you participate in our job application process, and how you can access and control this additional data. Please let us know if you have any questions about this supplemental notice.

### What additional data we collect about job applicants

#### Data you provide about yourself

When you participate in our job application process, we will ask you to provide personal data such as: your name, email address, mailing address, and telephone number; your resume/CV, work experience, educational history, and skills; links to any relevant websites or your LinkedIn profile; whether you are 18 years or older; and whether you are currently working for a grantee of ours. In addition, we will ask you to voluntarily provide information regarding your gender, veteran status, ethnicity, and disability status. This information, or your decision not to provide this information, will not impact your application in any way.

Before uploading a resume, please remove any sensitive personal data such as government-issued ID numbers, financial information, photos, dates of birth, etc. We do not require or wish to receive sensitive personal data in a resume.

#### Data we receive from other sources

We may receive personal data about you from other sources, your references, prior employers, a person or company/organization authorized by you to submit an application on your behalf, and/or publicly-available sources.

#### How to contact us

Via email,

[privacy@whdc.org](mailto:privacy@whdc.org)

If you prefer to contact us by mail:

WEST HARLEM DEVELOPMENT CORPORATION  
Attn: Legal - Privacy Notice Inquiry (Time Sensitive)  
423 W 127th St Suite A, Ground Floor, New York, NY 10027  
U.S.A