

Privacy Policy and Implementation Guidelines

Adopted: June 4, 2001

Amended: August 2, 2004 (allow internal use of personal information for research)

Amended: September 18, 2005 (to harmonize confidentiality policy and online privacy policy)

Amended: January 3, 2008 (to clarify inquiries may be forwarded through email)

Each BBB must post this revised model privacy policy online, as appropriately revised to reflect your BBB's practices, or one containing the elements of this policy and approved by CBBB, and follow the implementation guidelines, by January 1, 2006.

Model Better Business Bureau's Privacy Policy

The Better Business Bureau (BBB) is committed to maintaining your confidence and trust, and accordingly maintains the following privacy policy to protect your personal information.

BBB's Commitment to Security

BBB encrypts billing information wherever requested online.¹ Personal information is accessible only by staff and volunteers designated to handle complaints or requests. All BBB agents and contractors with access to personal information are also bound to adhere to this policy as part of their contract with BBB.

Personal Information that BBB May Collect

BBB collects the following types of personal information: names, postal and e-mail addresses, phone and facsimile numbers, billing information, and complaint and inquiry information.² BBB may also collect business information from sole proprietorships that apply for membership or program participation, some of which might constitute personal information, as well as personal information from individuals acting solely in their business capacity. BBB's online complaint form is hosted by the Council of Better Business Bureaus (CBBB), which processes your complaint according to its own privacy and security policies.³

BBB does not collect or maintain information from those actually known to be under the age of 13, and no part of our site is structured to attract anyone under the age of 13.

How BBB May Use Personal Information

Unless you consent, BBB will use your personal information for the purpose for which it was submitted such as to reply to inquiries, handle your complaints and process billing and business requests related to program participation, and we will use such information to provide operational notices, and in program recordkeeping and to conduct research on industry marketplace practices. Our research may lead to the

¹ Delete if no billing information is collected.

² Edit list to accurately reflect what the BBB collects.

³ BBBs that use CBBB's complaint form must hyperlink to CBBB Privacy Policy. Delete sentence if BBB hosts its own complaint form.

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publication of aggregate demographic data but will not result in the reporting or publication of any personal information provided to us. At certain points where personal information is collected on our site, there may be a box where you may indicate you would like to be on a list to receive information about other BBB programs and services and about ways to support the BBB and its Foundation.⁴ At any time you can add or remove your name from our mailing list by contacting us at **[ADD APPROPRIATE EMAIL ADDRESS]**.

How Your Information May Be Shared

In order to process complaints against businesses, BBB will transfer complaints received to the company complained about. It is also possible that a complaint, request or inquiry will be more appropriately handled by another BBB, in which case the request or inquiry will be transferred to the proper BBB. By completing a complaint form or sending us a request or inquiry, you are allowing us to forward your information to the proper business and also to the proper BBB, if necessary. Consumer inquiries may be forwarded by email, and consumers should recognize that this method of transmission may not be secure. BBB may also share your personal information with the CBBB for CBBB to research industry marketplace practices. Just as in any research we may do, CBBB research will not result in the reporting or publication of any personal information. BBB never sells or rents personal information.

We will also release personal information under the following circumstances:

- Where release is required by law (for example, a subpoena) or regulation, or is requested by an agency for governmental investigative purposes or governmental proceedings;
- Where our records indicate a company may be engaged in fraudulent activity or other deceptive practices that a governmental agency should be made aware of;
- To appropriate governmental authorities, where warranted by a company's failure to participate in BBB's advertising self-regulatory process; or
- To appropriate persons, where your communication suggests possible harm to others.

Help Us Keep Your Personal Information Accurate

If your personal information changes or you would like to review the personal information we may have on file, please email us with the new information or your review request at **[ADD APPROPRIATE EMAIL ADDRESS]**. Let us also know the department or BBB program that led to your submission of personal information so we may efficiently locate your information.

Computer Tracking and Cookies

Our web site is not set up to track, collect or distribute personal information not entered by its visitors. Our site logs do generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our site. This information is used for internal purposes by technical support staff to provide better services to the public and may also be provided to others, but again, the statistics contain no personal information and cannot be used to gather such information.⁵

⁴ Delete if BBB will not maintain lists. Edit if the BBB does not have a Foundation.

⁵ Edit above paragraph for accuracy.

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A cookie is a small amount of data that is sent to your browser from a Web server and stored on your computer's hard drive. BBB uses non-identifying cookies to provide easier site navigation and access to forms. You can still use BBB site if your browser is set to reject cookies. Our cookies do not generate personal data, do not read personal data from your machine and are *never* tied to anything that could be used to identify you.⁶

Problems

If you have a complaint about BBB's compliance with this privacy policy, you may contact us at **[ADD APPROPRIATE EMAIL ADDRESS]**.

Privacy Policy Implementation Guidelines

1. Identify one staff person responsible for implementation and oversight of the privacy policy;
2. Add your privacy policy to the footer on the BBB's web site ;
3. BBBs must revise their offline complaint forms to note: "Your privacy is important to us. Our privacy policy can be found at www.____.bbb.org or by contacting us."
4. Adopt a data security policy to protect personal information;
5. Incorporate the privacy policy into BBB's personnel manual;
6. Train staff about this policy;
7. Ensure that BBB agents and contractors with access to personal information abide by the privacy policy. One means to do this is by including a confidentiality clause in third party contracts. Alternatively, BBBs may provide agents and contractors with a copy of the privacy policy, ask that they read and return it to BBB signed and dated to indicate they understand and will comply with its terms; and
8. Agree to respond to public complaints about BBB's implementation of the privacy policy.

⁶ Delete paragraph if site does not use cookies.