



Seward County Chamber & Development Partnership (SCCDP) Data Protection and Privacy Policy (Updated 2021)

SCCDP Data Protection Policy

The SCCDP staff uses strong passwords for user authentication (i.e., lower/uppercase letters, numbers, and symbols). Multi-factor authentication is required for each SCCDP staff member and their work-issued laptop.

The SCCDP utilizes Microsoft Office 365 for data storage and email. Zoom is used for web conferencing. The SCCDP membership database is ChamberMaster. All SCCDP data is protected through these software services.

Each SCCDP staff member is expected to handle all data with the utmost care and concern. Per this topic of data protection, specific expectations of conduct are outlined in the SCCDP Record Retention Policy which is a part of the SCCDP General Operations and Employee Manual.

Technology Administration Policies

As outlined in the SCCDP General Operations and Employee Manual, the following sections summarize SCCDP employee expectations for handling equipment and technology (every new SCCDP employee is required to review and sign a Statement of Understanding and Employee Manual Purpose document; these are kept in employee files):

Use of Equipment/SCCDP Property

Employees are expected to take all precautions necessary to assure that SCCDP equipment and other property are not lost, damaged, or stolen. Employees should notify the President if equipment is in need of repair.

Employees may not use SCCDP's equipment on another job without authorization from the President.

Removal of any SCCDP property or records without the President's authorization is not allowed and will subject the employee to disciplinary action and/or termination. Any theft or loss should be reported to the President immediately.

Telephone & Cellular Phone Usage



The primary purpose of your office telephone is for business calls. Personal calls should be kept to a minimum and then preferably limited to emergencies or extreme necessities.

SCCDP reserves the right to monitor incoming and outgoing calls, and will incorporate a written performance improvement plan if excessive use of regular lines are being made for personal business.

Personal cell phones may be used for work as needed. In the event of resignation or termination, all email passwords will be changed and contents on phone/email account will be forwarded to the President or new employee.

Computer Software

All computers, monitors, servers, software, and computer services used by employees are the property of SCCDP. No-notice audits may be conducted at any time.

No outside software or hardware should be brought into SCCDP and/or installed on any SCCDP computer without prior approval from the President. In addition, all new software should be "virus checked" by the President or designated staff member before being installed on any SCCDP computer. All SCCDP desktops and laptops will be checked annually for compliance with all software licenses.

Electronic Mail (E-Mail) Usage

All employees are required to adhere to the following e-mail policy.

Ownership – All information and messages that are created, sent, received or stored on SCCDP's e-mail system is the sole property of SCCDP.

E-Mail Review – All e-mail is subject to the right of SCCDP to monitor, access, read, disclose and use such e-mail without prior notice to the originators and recipients of such e-mail. E-mail may be monitored and read by authorized personnel for SCCDP for any violations of law, breaches of SCCDP policies, communications harmful to SCCDP, or for any other reason.

Prohibited Content – E-mails may not contain statements or content that is libelous, harassing, illegal, derogatory, or discriminatory. Foul, inappropriate or offensive messages such as racial, sexual, or religious slurs or jokes are prohibited. Sexually explicit messages or images, cartoons or jokes are prohibited.



Security – The e-mail system is only to be used by authorized persons, and an employee must have been issued an e-mail password in order to use the system. Employees shall not disclose their codes or passwords to others and may not use someone else’s code or password without express written authorization from SCCDP.

No Presumption of Privacy – E-mail communications should not be assumed to be private and security cannot be guaranteed. Highly confidential or sensitive information should not be sent through e-mail.

Message Retention and Creation – Employees should be careful in creating e-mail. Even when a message has been deleted, it may still exist in printed version, be recreated from a back-up system, or may have been forwarded to someone else. Please note that appropriate electronic messages may need to be saved. And, SCCDP may be required to produce e-mail in litigation.

Consequences of Violations – Violations of this policy or other company policies may result in discipline, suspension, and even termination of employment.

Website, Blogging, and Social Media Policy

Why This Policy is Necessary

SCCDP utilizes social media, blogging and its website to share and promote the region and the organization’s activities. They are important marketing and communication tools for the chamber and economic development industries.

SCCDP understands that many of our employees enjoy sharing their knowledge and enthusiasm for our industry and region online and we encourage these activities. We also encourage employees to expand their knowledge and understanding of our industry by interacting with their colleagues online and in traditional meeting environments.

At the same time, management is responsible to protect the privacy, security and image of our company, clients, and stakeholders. This policy is intended to foster an open and expressive environment while at the same time maintaining company security.

Private Use of Social Media, Websites, and Blogs by Employees

A single employee is designated, and under the direction of the President, to produce and publish a regular blog for SCCDP, as well as regular posts, updates and news stories to SCCDP’s social media sites and website. All employees are encouraged to share these items through their contacts and to post items and photos of SCCDP’s



events, activities and news items about business, industry and the region. When sharing information about the chamber and economic development industry or an employee's area of expertise, the employee should make it clear that it is their own opinion. All postings must respect copyright, privacy, fair use, financial disclosure, and other applicable laws. Employees are not to use company logos or trademarks without permission.

Non-Disclosure of Confidential Information

Employees are never to reveal information that is covered by any non-disclosure agreement or the organization's confidentiality policy (see attached). In addition, employees are never to disclose information that has not already been made public by the SCCDP. This includes, but is not limited to: expansion plans; plant closings; business relocations; new product announcements; financial data; and staffing changes.

Maintaining Positive Communications

At all times, be respectful of SCCDP as well as its employees, customers, vendors, and competitors. Employees are ultimately responsible for their personal and professional online behavior and should avoid content or actions that are political, defamatory, pornographic, proprietary, harassing, libelous or threatening. Any employee can be sued by employees, competitors or any other individuals affected by such content. The SCCDP reserves the right to request certain subjects are avoided, withdraw certain posts, and remove inappropriate comments.

SCCDP Privacy Policy

This Privacy Policy describes Seward County Chamber & Development Partnership's (SCCDP) policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. This Privacy Policy has been created with the help of the [Privacy Policy Generator](#).

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.



Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Seward County Chamber & Development Partnership (SCCDP), 616 Bradford Street, Seward, Nebraska 68434.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to: United States
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Website.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (e.g., the duration of a page visit).
- **Website** refers to Seward County Chamber & Development Partnership, accessible from <https://cultivatesewardcounty.com/>.
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data



While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Information from Third-Party Social Media Services

If You decide to register through or otherwise grant us access to a Third-Party Social Media Service, We may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy.

Tracking Technologies and Cookies



We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Flash Cookies.** Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how You can delete Flash Cookies, please read "Where can I change the settings for disabling, or deleting local shared objects?" available at https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html#main_Where_can_I_change_the_settings_for_disabling_or_deleting_local_shared_objects
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. Learn more about cookies: [What Are Cookies?](#).

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**
Type: Session Cookies
Administered by: Us
Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Cookies Policy / Notice Acceptance Cookies**



Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.



- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data



Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.



Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country/state requires consent from a parent, We may require Your parent's consent before We collect and use that information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: hello@cultivatesewardcounty.com
- By phone number: (402) 643-4189



Sources Used for Creation of these Policies:

- SCCDP General Operations and Employee Manual
- <https://www.privacypolicies.com/live/370b7857-39cc-4345-ab99-029735484b34>
- Matthew Schranz, SCCDP IT Contractor