

The Turtle Survival Alliance Foundation

Privacy Policy

Last Approved by the Board of Directors: July 20, 2025

The Turtle Survival Alliance Foundation (“TSA”) respects privacy, and we know that many care about how information is used and shared. This Privacy Policy applies to the TSA website www.turtlesurvival.org, to all other websites controlled or operated by TSA from which you are accessing this Privacy Policy, to all associated subdomains, and Online services—including our donation and event registration portals, email communications, social media pages, and any other digital platforms or tools controlled or operated by TSA—and to any other interactions we may have with you, whether online or offline (collectively, the “Services”).

Please see our supplemental State Privacy Notices for additional details on how we handle your Personal Information and how to exercise your privacy rights.

What Information We Collect

When you use our Services, TSA and its Service providers (e.g., Customer Relationship Management, email marketing, or donation processing platforms, etc.) may collect *Personal Information* that you provide, such as your name, address, email address, telephone number, payment information, and photos or videos on your mobile device, if you give us access to them. “*Personal Information*” is information that identifies “*You*” as an individual or relates to an identifiable person.

In addition, TSA and its service providers use a variety of techniques to gather other information about your use of the Services, including, among other things, your IP address, browser type, mobile device type, content visited while on the Services, and the duration of your visit to the Services.

“*Other Information*” is any information that does not reveal your specific identity or does not directly

relate to an individual.

If you submit any *Personal Information* relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

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.

How We Collect Information

TSA and its service providers collect *Personal Information* that you provide while using the Services, either directly or through other user actions, including, without limitation, any *Personal Information* provided or otherwise obtained while the Services' web pages are open. For instance, TSA gathers information when you fill out forms on the Services, including, for example, e-newsletter sign-up forms, donation forms, event registration, surveys, and advocacy action alerts. We may also use analytics that enable us to obtain your *Personal Information* based on your use of the Services, including, for example, your clicks on Services' pages and page elements as well as information entered into the Services' HTML form fields, regardless of whether the form is

submitted.

We may collect information from and about you from other online and offline sources, such as public databases, vendors, list exchanges, social media platforms, and from people with whom you are friends or otherwise connected on social media platforms. For example, if you choose to connect your social media account to your Services account, certain *Personal Information* from your social media account will be shared with us. This may include *Personal Information* that is part of your profile or your friends' profiles.

TSA retains donor records and related correspondence for a period of seven (7) years in accordance with our data retention policy and nonprofit best practices. This includes records of contributions, acknowledgment letters, and other communications relevant to donor relationships.

We and our service providers may collect Other Information in a variety of ways, including through:

- **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 settings so that it will refuse Cookies, our Service may use Cookies.

We use “cookies” to help us monitor traffic and collect information about the use of the Services. Cookies are pieces of data placed on your device when you visit the Services that help us recognize you when you come back to the Services, allowing us, for instance, to remember the email address and password you use when you log in on a specific computer. TSA uses the aggregated information collected from cookies to measure the number of visits to the Services, the average time spent on the Services, the identity and number of pages viewed, aid in interest-based advertising with our collaborators, and to gather other traffic data and information that allows us to improve the Services. We also

use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience while using the Services. Cookies further allow us to select which of our content or advertisements are most likely to appeal to you and display them while you are on the Services. We may also use cookies or other technologies in online advertising to track responses to our ads. We may not respond to browser do-not-track signals. 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

- **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 TSA, 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).
- **Analytics & Optimization.** TSA also uses a variety of third-party web and mobile app analytics and optimization services to improve the Services and enhance the visitor experience. When you use the Services, we and our service providers may collect, record, and use your session information, including browsing behavior, click patterns, mouse movements, scrolling activity, keystrokes, chat messages, pages visited, and other analytics in order to improve user experience and the Services' quality, as well as to debug, identify, and repair errors that impair the intended functionality of our Services. The Services do not track your browsing habits across other third-party websites on our behalf.
 - We also use Google Analytics, which uses cookies and other similar technologies to collect and analyze information about the use of the Services and report on activities and trends. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/> and opt out of

them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- **Invisible reCAPTCHA.** We use Google's invisible reCAPTCHA application on our Services in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as such other information as IP address, date, time, language, screen size and resolution, and mouse movements. The use of the reCAPTCHA tool and information collected through it is subject to Google's privacy policy, available at <https://policies.google.com/privacy>, and Google's terms of service, available at <https://policies.google.com/terms?hl=en>.

We may also send anonymized and/or securely hashed data to our vendors to determine the effectiveness of our promotional campaigns.

- If you would like more information about these practices, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <https://optout.networkadvertising.org/> and <https://youradchoices.com/>. You may download the AppChoices app at <https://youradchoices.com/appchoices> to opt out of mobile apps.
- **Pixel Tags.** We may use pixel tags and other similar technologies to, among other things, track the actions of users of the Services, measure the success of our marketing campaigns, and compile statistics about use of the Services and response rates.
- **Browser/Device Information.** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and Internet browser type and version.

- **IP Address.** We may collect your IP address, which is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is a common practice and is done automatically by many websites, applications, and other services. We use IP addresses for purposes such as calculating usage levels, helping diagnose server problems, and administering the Services.
- **Physical Location.** We may collect the physical location of your device by, for example, using satellite, cell phone tower, or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing collaborators to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we and/or our marketing collaborators may not be able to provide you with the applicable personalized services and content. Our Apps may collect the precise location of your device when the App is running in the foreground or background, depending on how you choose to set up the App's location tracking.
- **Aggregating Personal Information.** We may aggregate *Personal Information*. Aggregated information does not personally identify you or any other user of the Services (for example, we may aggregate *Personal Information* to calculate the percentage of our users who have a particular telephone area code).

How We Use Collected Information

TSA may use your *Personal Information*:

- To send you information about TSA or TSA collaborators.
- To personalize your interactions with TSA, such as customizing your web and email content based on your interests, send you requests to participate in events in your area, and otherwise target content and communications to you.
- To respond to inquiries and fulfill your requests, such as to process donations, renew your membership, or send you information about a project, as well as to provide membership services.
- To send administrative information to you, such as information regarding the Services and changes to our terms, conditions, and policies.
- To improve our Services' functionality and user experience, and to debug, identify, and repair errors that impair the intended functionality of our Services.
- To allow you to participate in any events and to administer these activities; some of these activities have additional rules, which could contain additional information about how we use and disclose your *Personal Information*.
- To facilitate social sharing functionality.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products and services, enhancing, improving or modifying the Services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our activities, some of which may be shared or used by our vendors and their technologies and tools.

Your *Personal Information* may be disclosed:

- To our project collaborators for the purpose of implementing conservation activities.
- To our vendors and service providers that support our business and operations through a variety of activities, including but not limited to marketing, data processing, fundraising-related services, website hosting, data analysis and campaign measurement, payment processing, information technology and related infrastructure provision, customer service, email delivery, and auditing services.
- To third parties that assist our project collaborators, vendors, and service providers as part of their work with TSA.
- By you, on message boards, chat, profile pages, blogs, and other services to which you can post information and materials. Please note that any information you post or disclose through these services will become public and may be available to users of the Services and the public. We urge you to be very careful when deciding to disclose your *Personal Information*, or any other information, on the Services.
- To your friends associated with your social media account, to other website users, and your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Services account or log into your Services account from your social media account. By connecting your Services account and your social media account, you authorize us to share information with your social media account provider, friends associated with your social media account, and other website users, and you understand that the use of the information we share will be governed by the recipients' privacy policy(s). If you do not want your *Personal Information* shared with other users or with your social media account provider, please do not connect your social media account with your Services account, and do not participate in social sharing on the Services.

- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our operations, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We may also use and disclose your *Personal Information* as we believe to be necessary or appropriate:

- (a) under applicable laws, including laws outside your country of residence.
- (b) to comply with the legal process.
- (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence.
- (d) to enforce our terms and conditions.
- (e) to protect our operations.
- (f) to protect our rights, privacy, safety, or property, and/or that of yours, or others.
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose other information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat other information as *Personal Information* under applicable law, then we may use it for all the purposes for which we use and disclose *Personal Information*. In some instances, we may combine other information with *Personal Information*. If we do, we will treat the combined information as *Personal Information* as long as it is combined.

Retention of Your Personal Information

TSA will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information 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.

TSA 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 an extended time period.

Transfer of Your Personal Information

Your information, including Personal Information, is processed at TSA'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 with that transfer.

TSA 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 Information 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 Information

Business Transactions

If TSA is involved in a reorganization, joint venture, assignment, transfer or other disposition of all or any portion of our operations or assets, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different

Privacy Policy.

Law enforcement

Under certain circumstances, TSA may be required to disclose your Personal Information 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

TSA may disclose your Personal Information in the “*good faith*” belief that such action is necessary to:

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

Security of Your Personal Information

The security of your Personal Information 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 Information, we cannot guarantee its absolute security.

Please do not send us sensitive information unless requested by one of TSA’s representatives.

How Can You Control the Collection of Your Information on the Services?

1. Set your web browser to inform you of when cookies are being set before a cookie is stored, refuse any request to set cookies, and do not accept cookies from TSA. Erase all

TSA cookies from your hard drive. You may also wish to refer to:

<https://allaboutcookies.org/how-to-manage-cookies>.

2. Do not provide your information when prompted by the ss.

Please note, however, that if you choose to reject or erase cookies, your ability to navigate the Services may be limited, and you also may not receive advertising or other offers from us that are relevant to your interests and needs.

Delete Your Personal Information

You have the right to delete or request that we assist in deleting the Personal Information that we have collected about you.

Our Services may give you the ability to delete certain information about you from within the Services.

You may update, amend, or delete your information at any time by signing in to your account, if you have one, and visiting the account settings section that allows you to manage your *Personal Information*. You may also contact us to request access to, correct, or delete any information that you have provided to us.

Please note, however, that we may need to retain certain information when we have a legal obligation or lawful basis to do so.

How Can You Modify Your Information?

If you would like to modify the *Personal Information* you have previously provided us, please contact us at development@turtlesurvival.org.

How Can You Stop Receiving Certain Communications from TSA?

If you would like to opt out of receiving certain content from TSA, you can:

- Submit a request to development@turtlesurvival.org.
- Take the opportunity to opt out using links at the bottom of the marketing email TSA sends to you.
- Call us at 1-843-724-9763 or tell us you do not want to receive communications from TSA or email development@turtlesurvival.org.

Please note that if you opt out of receiving marketing-related emails from us, we may still send you emails. Important administrative messages, from which you cannot opt out.

Does TSA Collect Information from Children?

TSA does not knowingly collect *Personal Information* from anyone under the age of 13. The Services are not directed at children under the age of 13. If TSA learns that it has collected *Personal Information* from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you believe that we might have collected any *Personal Information* from a child under 13, please contact us at development@turtlesurvival.org.

Your U.S. State Law Privacy Rights

Various U.S. State laws may permit you to exercise certain rights relating to TSA's collection and use of your *Personal Information*. Please refer to our [State Privacy Notices](#), which supplement this Privacy Policy.

Third-Party Services

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked

site or service by us. In addition, we are not responsible for the information collection, use, disclosure, or security practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, payment services provider, wireless service provider, or device manufacturer.

Changes to this Privacy Policy

TSA may, from time to time and at its discretion, amend this Privacy Policy. The “Effective Date” legend at the top of this page indicates when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services.

Security

TSA has procedures and technology in place to safeguard and secure the information we collect. Records containing *Personal Information* are stored at secure facilities. TSA employees are provided with training on how to treat your data securely. Our websites use **Transport Layer Security**, the standard security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remains private. All online donation transactions are handled by Payment Card Industry (PCI)-compliant vendors. PCI refers to the technical and operational standards that businesses must follow to ensure that credit card data provided by cardholders is protected. These security standards are in place for TSA to protect your information.

Cross-Border Transfer

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States.

The European Union and other countries with Data Protection Laws.

TSA is committed to protecting Personal Information to the fullest extent of its Privacy Policy.

Because TSA is based in the U.S., this policy is consistent with U.S. law and practice. This Privacy Policy is not adapted to European laws. By agreeing to TSA's Privacy Policy, you consent to TSA applying its Privacy Policy in place of data protections under your country's law. That is, you freely and unambiguously consent that:

- Terms of this Privacy Policy, not your home country's laws, control how TSA will process personally identifiable information about you.
- Data you enter on this Site, and other data connected with your account, will be transmitted to and processed in the U.S., a jurisdiction whose laws do not offer data protections equivalent to those of your home.
- Sensitive data will also be processed consistent with this Privacy Policy and transmitted to/processed in the U.S., a jurisdiction without equivalent data protections.

Malagasy Law 2014-038 on Personal Information

The main objective of Law 2014-038 is to protect the rights of individuals regarding the processing of Personal Information. The development of information technology and computing is recognized as an important factor in development, but the need to regulate their use is also emphasized to protect the fundamental rights and freedoms of the individuals concerned. This law establishes that the right to the protection of Personal Information is a right recognized to all individuals and an integral part of human rights.

The law establishes several fundamental principles for the processing of Personal Information. Data must be collected and processed fairly, lawfully, and not fraudulently for specified, explicit, and legitimate purposes. It must not be subsequently used for other, incompatible purposes, except with consent or as otherwise provided by law. Data must also be adequate, relevant, and not excessive, as well as accurate and, where necessary, updated. A key principle is the limitation of retention: data must be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which it is collected or used, with possible exceptions for archival, historical,

statistical, or scientific purposes under safeguards.

To ensure compliance with these principles and the rights of individuals, the law establishes an independent data protection authority called the Malagasy Commission for Information Technology and Civil Liberties (CMIL). The CMIL is responsible for ensuring that Personal Information processing is carried out in accordance with the provisions of the law. The law also guarantees rights to data subjects, including the right to object to being included in a processing operation, the right to access their data, the right to rectify inaccurate or incomplete data, and the right to be informed of the collection and processing of their data.

State Privacy Notices

Turtle Survival Alliance Foundation. State Privacy Notices.

Last Approved by the Board of Directors: July 20, 2025

These additional State-specific Privacy Notices (“State Privacy Notices”) supplement Turtle Survival Alliance’s Privacy Policy (the “Privacy Policy”) and provide additional information for residents of the noted States. Capitalized terms have the meanings defined for them in the Privacy Policy.

California:

If you are a California resident, California Civil Code Section 1798.83 permits you to request information about our disclosure of your Personal Information to third parties for those parties’ direct marketing purposes. You may also request that TSA “not” share your *Personal Information* as part of TSA’s participation in list exchanges. To make a request send a letter to:

Member Solutions – Privacy Support

Turtle Survival Alliance

5900 Core Rd. Ste 504

North Charleston, SC 29406

Colorado, Oregon, New Jersey, and Delaware:Rights and Requests

If you are a Consumer as defined by the Colorado Privacy Act, the Oregon Consumer Privacy Act, the New Jersey Data Privacy Act, or the Delaware Personal Information Privacy Act, as applicable (Applicable Privacy Laws), you have certain rights relating to your Personal Information. You or your authorized agent may submit a request to exercise these rights as follows:

- Request to access your *Personal Information*: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org. If you are an Oregon resident, you may also request that we disclose to you the categories of *Personal Information* we process about you and the third parties to whom we have disclosed *Personal Information*.
- Request to correct your *Personal Information*: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org.
- Request to delete your *Personal Information*: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org.
- Request to exercise your right to data portability: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org.
- Request to opt out of the sale (as defined by Applicable Privacy Laws) of your

Personal Information: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org.

- Request to opt out of the use of your *Personal Information* for targeted advertising: Submit your request that contains the information described in the “Information Needed to Authenticate you or your authorized representative” section below via email to development@turtlesurvival.org. Alternatively, you can turn off cookies that support targeted advertisements by clicking “Cookie Settings” at the bottom of the TSA website and toggling off “Targeting Cookies.”

If we refuse to act on your request, you may appeal this refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us at development@turtlesurvival.org.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the *Personal Information* subject to the request. We may need to request additional *Personal Information*, such as your contact details or information about your previous transactions with us, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your *Personal Information*. If you make a request to delete, we may ask you to confirm your request before we delete your *Personal Information*.

We also process opt-out preference signals, such as the Global Privacy Control. These signals set your opt-out preferences only for the particular browser or device you are using and any consumer profile that we associate with that browser or device. For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

Authorized Agents

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted in the section above entitled “Rights and Requests.” We will process the agent’s request consistent with applicable law. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the section above entitled “Rights and Requests” or confirm that you provided the agent permission to submit the request.

De-Identified Information

Where we collect information from you that cannot reasonably be used to infer information about, or otherwise be linked to, you, or a device linked to you (“de-identified information”), we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

Material Changes to this Privacy Notice

TSA may make material and non-material changes to this Privacy Notice and its Privacy Policy at its sole discretion from time to time. TSA will notify you of material changes through the Cookie Banner on this Site. The date shown at the beginning of this Privacy Notice and our Privacy Policy will reflect the date of the most recent changes.