

Coleridge Initiative, Consumer Privacy Notice

Who Are We?

The Coleridge Initiative, Inc. is a not-for-profit organization that facilitates the use of data to inform public decision-making more effectively. We achieve this goal by partnering and collaborating with government agencies to create value for the taxpayer by careful use of data, by building new technologies to enable secure access to and sharing of confidential microdata, and by training agency staff to acquire modern data skills.

Under a sponsorship from the U.S. Census Bureau, Coleridge was originally established to build a secure remote access facility to host confidential data to inform the decision-making of the Commission on Evidence-Based Notice making. Presently, The facility – the [Administrative Data Research Facility](#) (ADRF)- hosts over 400 confidential datasets from over 50 federal, state, and local government agencies in a FedRAMP authorized environment.

What Does This Privacy Notice Cover?

We are committed to protecting the privacy of our consumers. In this Privacy Notice related to services we, we explain **who we are, why and how we collect, store, share and use** (together, "process") **your personal data (Personal Information and/or Protected Health Information (PI)), your rights and how to contact us.**

Please read this notice carefully to understand our views and practices regarding your personal information and how we will treat it. **By providing your PI to us and/or otherwise engaging with our Services, you acknowledge you have read and understood this privacy notice.**

We are responsible for treating your PI safely, in accordance with applicable data protection and privacy laws. If you have any questions about how we protect your PI, please **contact us.**

This Privacy Notice covers our treatment of any Personal Information that you, the consumer, share with us or that our business partners have provided. For information about how we treat PI of our business partners, please see our separate business to B2B Privacy Notice accessible [here](#).

The Type of Personal Information We Collect

We currently collect and process the following information:

- Personal identifiers, contacts, and characteristics (for example, name and contact details)
- Employment Data (Employer, Job Title)
- Email Addresses
- Customer Financial Information

Coleridge Initiative, Consumer Privacy Notice

How We Get the Personal Information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- For coursework enrollment purposes
- To request access to the ADRF
- To request information about our service offerings
- To request ADRF user support
- To contract for services.

We also receive personal information indirectly, from the following sources in the following scenarios:

- From your employer or related organisations to provide access to the ADRF
- From your employer or related entities to enrol you in coursework
- From your employer or related entities to request access to our services and service offerings.

Why We Have It

We use the information that you have given us to:

- To provide services requested by you
- To provide services requested by your employer or related organisations on your behalf
- To respond to information request regarding our service offerings
- To respond to ADRF user support request

OUR LEGAL BASES FOR PROCESSING

- Consent
- Legal obligation
- Our legitimate interests

Who Is the Information Shared With

Information Shared with Our Sub-contractors:

We employ and contract with people and other entities that perform certain tasks on our behalf (our “sub-contractors”).

Our subcontractors may gain incidental access to your PI to assist us in our mission to provide services to your entity. Our sub-contractors may only use PI in accordance with our instructions.

Our sub-contractors may include:

Coleridge Initiative, Consumer Privacy Notice

- Technical staff who assist us with maintaining and/or securing your data.
- Organizations that assist is with marketing and administering programs.
- Our auditors, legal advisors and other professional advisors or service providers
- Payment processing providers who provide secure payment processing services (note your payment card details are not shared with us by the provider)

Information Disclosed for Our Protection and the Protection of Others

We also reserve the right to access, disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process, or governmental request, (ii) enforce our contractual responsibilities, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and to prevent cybercrime, including but not limited to spam/malware prevention.

Information We Share with Your Consent

Except as set forth above, you will be notified prior to your PI being shared with third parties.

Legal bases explained

Consent: We will only access your personal information when you have given us your express consent for us to do so, where required by law and/or regulation.

Contract/Provide a Service/Query: We also collect, store, and process your agency's personal information where it is necessary for performing a service you have requested, where you have asked us to take specific steps regarding a service we may provide, or where you may have a question regarding our products, services, or provisions thereof.

Legal Obligation: we may need to process your personal information to comply with our legal obligations, including under applicable local and Federal law, and any court orders.

Legitimate interests: processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests.

Our legitimate interests are:

- delivering, developing, and improving our Platform and Services, including using data
- enabling us to enhance, customize or modify our Platform, Services, and communications
- improving our Platform and data security
- product development

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us at Privacy Officer.

How We Store and Secure Your Data

Coleridge Initiative, Consumer Privacy Notice

Your PII may be stored in a variety of locations within our organization.

We maintain the appropriate physical, technical, and organizational safeguards necessary to defend against unauthorized processing of personal data and against accidental loss, destruction or damage.

Your Data Protection Rights

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. However, more than one request per year may result in your being charged the actual cost to make multiple requests for items such as copies.

Should you make a request, we will respond within 30 days.

What Happens When There Are Changes to this Privacy Notice

This notice was last updated on February 1, 2023.

Any changes we make to this notice in future will be posted on this page. If we make any substantive changes, we will post notice on our website or through a pop-up within our Sites.

What If We Have Questions or Concerns

If you have any questions or concerns regarding privacy of your PI, please send contact our Data Privacy Officer at info@coleridgeinitiative.org.