

Project VIC International Inc Privacy Policy

Effective date: October 1, 2025

Controller: Project VIC International (a U.S. 501(c)(3) nonprofit)

Websites & Programs Covered: gpusforgood.org, projectvic.org, subdomains, and related program pages, forms, and services supporting Project VIC International's activities, including **GPUs for Good, Project VIC hash-sharing programs, training and certifications, software licensing and access, open-source project participation, and stakeholder events/meetings.**

1) Purpose

Project VIC International ("Project VIC," "we," "us," or "our") is committed to protecting the privacy and security of everyone who interacts with our organization—including donors (hardware or funds), law-enforcement personnel and non-law-enforcement support persons, trainees, software licensees and their organizations, open-source contributors, event/meeting participants, volunteers, staff, and governance members. This policy explains what information we collect across our programs, how we use and protect it, and the choices you have. It also incorporates and references our **Donor Privacy Policy** (see §12).

2) Scope

This policy applies to personal information collected online or offline through gpusforgood.org, projectvic.org, and associated Project VIC channels (web forms, email, events/meetings, phone, ticketing systems, and third-party platforms we use to run our programs). It covers:

- **Donors** of GPU hardware and funds (individuals or organizations)
 - **Law-enforcement agency personnel** and **non-law-enforcement support persons** who inquire about or receive services (e.g., ICAC affiliates, digital-forensics partners)
 - **Training participants** and certification candidates
 - **Software licensees** and organization administrators/end users
 - **Open-source contributors** and collaborators
 - **Event/meeting registrants and attendees** (including stakeholder convenings)
 - **Volunteers, staff, steering committee, and board members** in the course of official duties
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3) Information We Collect

We collect only what is necessary to operate our programs, fulfill our nonprofit mission, and comply with law. Depending on your interaction with us, we may collect:

- **Identity & Contact:** name, organization/agency, title/role, email, phone, mailing address.

- **Donation Details:** donation type (e.g., GPU model, quantity, condition), donation history, preferences, acknowledgments/receipts.
- **Financial Processing Data:** billing name, address, payment method token(s) (processed via PCI-compliant providers; we **do not** store full card numbers or CVV), and transaction metadata.
- **Program Operations & Eligibility:** agency affiliation, duty status, shipping details, and records needed to verify lawful eligibility of recipient agencies or program participation.
- **Training & Certification Data:** course enrollments, attendance, completions, scores (where applicable), and feedback.
- **Licensing & Access-Control Data:** license entitlements, organization administrator details, user account identifiers, permitted devices, usage/activity needed to provide the service and enforce terms.
- **Project VIC International Managed Github Repository Participation Data:** contribution handles/ usernames (e.g., GitHub), submitted issues/PRs, affiliation (if provided), and contributor agreements.
- **Event/Meeting Data:** registrations, accommodations/preferences, attendance, media consent (if applicable).
- **Communications & Preferences:** inquiries, support tickets, opt-in subscriptions, consent choices.
- **Technical Data (Sites/Forms):** IP address, device/browser info, and cookie/analytics data (see §9).

Sensitive or restricted information (e.g., data tied to ongoing investigations) is handled with heightened confidentiality and access controls. We do **not** knowingly solicit information from children for our programs.

4) How We Use Information

We use information to:

- Operate and improve our programs (e.g., **hash-sharing enrollment and support, training, software licensing and access, open-source collaboration, events/meetings**, and **GPUs for Good** logistics and support).
- Process donations and issue receipts; acknowledge and thank donors.
- Provide training, certifications, and program communications; administer licenses; and coordinate stakeholder convenings.
- Verify eligibility of law-enforcement recipients and maintain audit/compliance records.
- **Coordinate with ICAC command structures:** We may share **contact information** received from **ICAC Task Force affiliate agencies** and **non-affiliate local law-enforcement agencies** with the **appointed ICAC Commander** or their designee for purposes of **program deconfliction** and to assist with **priority assignment within the Commander's area of responsibility (AOR)**.
- **Enable official duties of our team and governance:** Individuals formally appointed to our **Volunteer Team, Staff, Steering Committee, and Board of Directors** may **observe and use information** provided to us **in the official course of their duties**, subject to confidentiality obligations and role-based access controls.
- Comply with applicable laws, taxation, and reporting requirements.

Our public impact communications

When we share program impact (on our website, reports, or presentations), we **anonymize** donor names and organizations by default. Where public recognition is appropriate and desired, we will obtain consent or provide a clear opt-out.

5) Legal Bases for Processing (where applicable)

Depending on jurisdiction, we rely on one or more of the following legal bases:

- **Consent** (e.g., marketing subscriptions, optional analytics cookies)
 - **Legitimate Interests** to pursue our charitable mission and operate the program in ways that do not override your rights and freedoms
 - **Legal Obligations** (e.g., tax, accounting, compliance inquiries)
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6) Where We Store Data

Program data is stored in **Project VIC-owned or controlled repositories and systems** (e.g., our CRM, ticketing/helpdesk, document storage), hosted with reputable providers. Access is role-based and limited to personnel and volunteers with a need to know.

7) Sharing & Disclosure

We **do not sell, rent, or trade** your personal information. We also do not disclose it outside of Project VIC **except** to:

- **Fundraising, donation, payment, logistics, and communications providers** (e.g., donation platforms, email/CRM, shipping) that process data **under contract**, solely to provide services to us.
 - **Law-enforcement or regulators** when required by law, subpoena, or to protect safety, security, or our rights.
 - **Aggregated or anonymized statistics** that cannot reasonably identify you (e.g., number of GPUs placed, average gift size).
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8) Security

We apply administrative, technical, and physical safeguards designed to protect personal information, including:

- Encrypted transmission and storage where appropriate
- Role-based access controls and multi-factor authentication in key systems

- Vendor due-diligence and use of industry standards (e.g., PCI-DSS-compliant payment processors; SOC-2-aligned cloud services where applicable)
- Security training and periodic reviews

No system is 100% secure, but we continuously work to reduce risk and improve controls.

9) Cookies & Online Analytics

- **Essential cookies** support core site functionality and security and are always on.
 - **Analytics cookies** help us understand and improve site usage. Where required by law, non-essential cookies are set only with your consent, and you can withdraw consent at any time via your browser or our cookie banner (when available).
 - We do **not** use ad-retargeting based on donor status, and we do not track users across unaffiliated websites.
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10) Your Choices & Rights

Subject to applicable law, you may have the right to:

- **Access** the personal information we hold about you
- **Correct** inaccuracies
- **Delete** your information (unless retention is required by law)
- **Restrict** or **object** to certain processing
- **Opt out** of non-essential communications
- **Receive a portable copy** of your information

How to make a request

Email support@projectvic.zendesk.com with your request. For your protection, we will verify your identity and then respond within a reasonable period required by applicable law. If you are a California resident, you may have additional rights under California law (see §11). If you are located in the EU/UK or other jurisdictions with data-protection laws, you may have similar rights, and we will honor requests consistent with those frameworks.

11) State/Regional Disclosures

- **California:** If and when the California Consumer Privacy laws apply to us, California residents may request access and deletion of personal information and the right to limit certain uses of sensitive personal information. We do not “sell” personal information and do not share personal information for cross-context behavioral advertising. California residents can exercise rights using the contact method above.

- **Other U.S. states:** We comply with applicable breach-notification and consumer-privacy requirements. Where required, we will notify affected individuals and regulators without undue delay and consistent with statutory timelines.
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12) Donor Privacy Policy (Incorporated by Reference)

Our **Donor Privacy Policy** governs additional details for donors, including definitions, collection/use, storage & security controls (e.g., use of PCI-DSS-compliant gateways; we **never** store full credit-card numbers or CVV), sharing & disclosure rules (service-provider contracts; prohibition on sale/rent/trade of donor lists), donor rights, cookie/online tracking practices, data retention & destruction, breach notification, training & accountability, and review cadence. In case of any conflict, the policy that affords **greater** privacy protection to donors will control. For questions, contact support@projectvic.zendesk.com.

13) Data Retention & Destruction

We retain personal information only as long as necessary to fulfill the purposes described in this policy (e.g., program operations, receipts, legal/accounting obligations) and then securely delete or anonymize it in line with our Document-Retention & Destruction Policy. Donation records are generally kept for required tax and audit periods. Payment credentials are handled by our payment providers; we do not retain full card data.

14) International Data Transfers

Our primary systems are U.S.-hosted. If we transfer data across borders (e.g., for a service provider), we use appropriate measures permitted by law (such as contractual safeguards).

15) Law-Enforcement Agency Personnel

We collect only what is necessary to evaluate eligibility and deliver program benefits. Records connected to operational matters are access-restricted. We do not publish identifying information about recipient personnel without explicit permission or a clear operational/legal requirement.

16) Requests to Remove Your Data

If you want us to remove your data from our holdings, email support@projectvic.zendesk.com and specify the scope (e.g., donor records, mailing lists, support tickets). We will confirm receipt, verify identity, and complete eligible deletions or de-identification unless legal retention requirements apply.

17) Changes to This Policy

We may update this policy from time to time to reflect operational or legal changes. Material changes will be posted on this page and, where appropriate, notified by email at least **30 days** before they take effect. The "Effective date" at the top shows the latest version.

18) Contact Us

Questions or privacy requests:

- **Email:** support@projectvic.zendesk.com
 - **Mailing address:** Project VIC International, 83 Ridge Terrace, Neptune City, New Jersey 07753
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Quick Summary (Plain-Language)

- We collect only what we need to operate our programs—hash sharing, training, software licensing, open-source collaboration, stakeholder meetings, and GPUs for Good—and to comply with the law.
- We store data in Project VIC International-controlled systems with access controls and encryption. Only our staff, Board of Directors, Steering Committee, and Volunteers will have access to your data in the course of their official duties.
- We do **not** sell, rent, or trade personal information.
- We share data only with service providers under contract and with authorities when required; limited ICAC Commander sharing is for deconfliction and prioritization.
- We anonymize donor names/organizations in public updates by default.
- You can correct, delete, or opt out—email support@projectvic.zendesk.com.