

# The Dollywood Foundation

## Local Program Partner Data Sharing Policy

Updated: June 2024

All Book Order System (BOS) Users who have access to confidential data agree to strictly adhere to The Dollywood Foundation policies detailed in this agreement.

The Dollywood Foundation complies with the international data protection standards of General Data Protection Regulation (GDPR). GDPR defines The Dollywood Foundation (DWF) as a Data Controller for Dolly Parton's Imagination Library (DPIL), responsible for the secure capture, storage, use and disposal of all Personally Identifiable Information (PII) captured in association with the program. Our lawful basis for processing PII is consent of the parents on behalf of their minor children. In addition to agreeing to the Terms & Condition and Privacy Policy, all parents or authorized adults explicitly consent to the following:

*I hereby explicitly consent to allow the Dollywood Foundation, Inc. to use the information provided herein for the purposes of participating in Dolly Parton's Imagination Library book gifting program. To measure the benefits of this program we may create datasets with the information provided herein and share them with research and educational advancement partners. By checking the box and continuing this registration you expressly consent to the terms set forth herein.*

As a BOS User, you agree to receive confidential data from The Dollywood Foundation and to observe the following security provisions in capturing, storing, using and disposing of the data.

1. Policy for data capture

a. All registration information, change of address information or Personally Identifiable Information (PII) offered by families participating or seeking to participate in Dolly Parton's Imagination Library may *only* be entered into the Book Order System (BOS) made available by the Dollywood Foundation. It is not permissible to capture PII through any other website, database or service.

b. Data may be submitted by the registering parent or authorized adult online at [imaginationlibrary.com](https://imaginationlibrary.com), via DPIL's online registration embedded on another website or via an approved Dolly Parton's Imagination Library paper registration brochure that includes the Dollywood Foundation's explicit consent language. Paper registrations must be promptly entered into the BOS by an approved user and all paper registrations shall be destroyed after 30 days. Absolutely no other source or method may be used to capture DPIL information.

2. Policy for data storage

a. The location of *all copies* of the data must be carefully tracked.

b. Any downloaded data, such as monthly child lists, may only be stored on an encrypted external hard drive, on a password protected desktop computer or on an encrypted, password protected laptop. PII should never be stored in an online cloud drive.

c. Personally Identifiable Information (PII), including names, addresses, email addresses, phone numbers, and the like may never be uploaded to third party software or contact management tools not provided by The Dollywood Foundation.

d. Data files, both electronic and paper, *must* remain secure throughout the duration of data storage.

### 3. Policy for data usage

a. Any BOS User are required to have their own username and password, and this login information may not be shared with anyone else.

b. Only registered BOS Users may access data. Data may not be shared with any other individuals outside those detailed in a Research Data Sharing Agreement provided and explicitly approved by The Dollywood Foundation.

*\*If a BOS User receives a court order to provide confidential data held in the BOS, the User agrees to promptly direct any such request to The Dollywood Foundation's Data Protection Officer at [dpo@imaginationlibrary.com](mailto:dpo@imaginationlibrary.com). As the Data Controller, it is The Dollywood Foundation's responsibility to address court orders for information.*

c. BOS User shall not permit any individual to utilize the BOS if such individual has been charged with and/or convicted of any crime involving children.

d. Data may only be used in a manner that respects privacy and confidentiality of all concerned parties, especially regarding registered children and their parents and caregivers.

e. Data may only be used for the purposes of running reports, investigating mailed books, updating addresses and contact information, addressing mailing issues and research as outlined in 3.b.

f. Publicly available discussions, presentations and reports based upon the confidential data may not include information that would make it possible to identify a registered child, parent or address registered or previously registered for DPIL.

g. Internal discussions and reports should protect the privacy, anonymity and confidentiality of all concerned parties and must ensure that any internal document not become publicly available.

h. Internal documents that contain any PII must clearly be marked “confidential—for internal use only”

i. Data from the BOS containing PII may never be sent in the body of or attached to an email or any similar, unsecured communication.

4. Policy for data disposal

a. The data *must* be destroyed in accordance with The Dollywood Foundation’s Data Retention Policy as follows (also outlined in the foundation’s Terms and Conditions available at [imaginationlibrary.com](http://imaginationlibrary.com)):

The Dollywood Foundation, Inc. is committed to keeping personally identifiable information from Dolly Parton’s Imagination Library participants for a limited time by adhering to a model that retains information only as long as necessary to allow for research and program reporting.

**Local Program Partner (LPP) Access:**

The full registration record will be maintained in the Book Order System from date of registration up to the month of child’s 5th birthday. Upon month of child’s 5th birthday, LPPs are able to access an amended record, with the child’s name and account email removed, for 12 months. Upon the month of child’s 6th birthday, the registration record is no longer available to LPPs in the Book Order System.

**The Dollywood Foundation, Inc. Access:**

The full registration record is maintained in the Book Order System for program administration, research and program reporting from date of registration up to the month of child’s 11th birthday. Upon month of child’s 11th birthday, The Dollywood Foundation, Inc. will anonymize the registration record, permanently deleting all personally identifiable information (PII), and retain the anonymized record in the Book Order System for program reporting until the Dollywood Foundation ceases operation.

b. Any child list or PII downloaded from the BOS should be permanently deleted within 12 months.

c. Data Deletion Requests - DPO will remove, contact LPP to delete on all downloaded childlists.

5. Compliance

a. As the Data Controller, The Dollywood Foundation reserves the right to audit any partner to ensure compliance with the policies detailed in this agreement. If any of the policies are not followed, The Dollywood Foundation may immediately terminate access to the BOS and participation with Dolly Parton’s Imagination Library program.