

ALUMNUSB PRIVACY POLICY

Last Updated: April 2024

This “Privacy Policy” explains what information of yours will be collected when you use AlumnUSB.org (the “Website”) and related services (the “Service”), how the information will be used, and how you can control the collection, portability, correction and/or deletion of information. We will not use or share your information with any third parties except as described in this Privacy Policy. This Privacy Policy forms part of the Terms of Use located at <https://alumnusb.org/terms> as applicable the “Agreement”). From time to time, we may modify the Privacy Policy described on this page in accordance with the Terms of Use. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms of Use.

1. CONSENT

By using the Service or allowing someone to use the Service on your behalf, you are consenting to our collection, use, disclosure, processing, transfer and storage in accordance with this Privacy Policy of any Personal Data or other information received by us as a result of such use.

2. PRIVACY POLICY LINKS

We make an effort to provide a link to this Privacy Policy in the footer of every page on our websites, including those pages on which Personal Data is collected, and to make it available in all of our software.

3. INFORMATION WE COLLECT

When you interact with us through the Service, we may collect Personal Data and other information from you, as further described below:

3.1. “Personal Data”:

(i). **AlumnUSB donors**: We collect Personal Data from you when you voluntarily provide such information to the Service, such as when you register for access to the Service as a Donor, contact us with inquiries, respond to one of our surveys or use certain services. The Personal

Data we may collect includes without limitation your name, address, email address, phone number and other personally identifiable information.

(ii). **AlumnUSB subscribers**: We collect Personal Data from you when you voluntarily provide such information to the Service (including event registration pages within the Service), such as when you register for access to the Service (whether as an AlumnUSB Donor or otherwise), donate to a Campaign, register to volunteer your time to a Campaign, register for a Campaign event, use text to give service by sending a message to us from your phone, contact us with inquiries, respond to one of our surveys or use certain parts of the Service. The Personal Data we may collect includes without limitation your name, address, email address and other personally identifiable information. If you correspond with us by email, we may retain the content of your email messages, your email address and our responses.

3.2. Non-Personal Data:

(i). Non-Identifiable Data: When you interact with the Service, we collect certain personally non-identifiable information ("Non-Personal Data"). The Non-Personal Data we collect includes without limitation Internet Protocol (IP) addresses, internet browser type, other characteristics of your device and software, domain names of your Internet Service Provider("ISP"), your approximate geographic location, a record of your usage of the Service, the time of your usage and aggregated Personal Data that cannot be used to specifically identify you. We will use this information to monitor and prevent fraud, diagnose problems, and (anonymously) estimate demographic information. Such information, which is collected passively using various technologies, cannot, in and of itself, be used to specifically identify you. We also collect Non-Personal Data (including, without limitation, of the type set forth above) from third parties. The information we collect from third parties may be combined with the information we collect.

4. HOW WE USE YOUR COLLECTED INFORMATION

4.1. Personal Data:

We use the Personal Data we collect in a manner that is consistent with this Privacy Policy. We may use the Personal Data as follows:

(i). Specific Reason: If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.

(ii). Access and Use: If you provide Personal Data in order to obtain access to or use of the Service or any functionality thereof, we will use your Personal Data to provide you with access to or use of the Service or functionality and to monitor your use of the Service or functionality.

(iii). Internal Business Purposes: We may use your Personal Data for internal business purposes including without limitation to help us improve the content and functionality of the Service, to better understand our Users, to improve the Service, to protect against fraud, identity or address wrongdoing, to enforce our Terms of Service, to manage your Account and provide you with customer service, and to generally manage the Service and our business.

(iv). Marketing: We may use your Personal Data to contact you in the future for our marketing and advertising purposes, including without limitation to inform you about services or events we believe might be of interest to you, to develop promotional or marketing materials and provide those materials to you, and to display content and advertising on or off the Service that we believe might be of relevance to you.

(v). If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected or we will obtain your consent subsequent to such collection but prior to such use.

4.2. Non-Personal Data:

(i). Because Non-Personal Data cannot be used to personally identify you, we may use such information for any lawful purpose.

5. OUR DISCLOSURE OF THE INFORMATION THAT WE COLLECT

5.1. Personal Data:

We are not in the business of selling your Personal Data. We consider this information to be a vital part of our relationship with you. Therefore, we will not sell your Personal Data to third parties, including third party advertisers. There are, however, certain circumstances in which we may disclose, transfer, process or share your Personal Data with certain third parties without further notice to you, as set forth below:

(i). Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of AlumnUSB (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.

(ii). **Subsidiaries and Affiliates:** We may also share your Personal Data with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy. Our subsidiaries and affiliates will be bound to maintain that Personal Data in accordance with this Privacy Policy.

(iii). **Agents, Consultants and Related Third Parties:** We, like many businesses, sometimes engage other companies to perform certain business-related functions. Examples of such functions include mailing information, order fulfillment, fraud prevention, maintaining databases and processing payments. When we engage another company to perform such functions, we may provide them with information, including Personal Data, in connection with their performance of such functions.

(iv). **Legal Requirements:** We may disclose your Personal Data if required to do so by law (including, without limitation responding to a subpoena or request from law enforcement, court or government agency) or in the good faith belief that such action is necessary.

5.2. Non-Personal Data:

(i). Because Non-Personal Data cannot be used to personally identify you, we may disclose, transfer or share Non-Personal Data for any lawful purpose.

6. EMAIL AND SECURITY

6.1. By providing your email address to AlumUSB, you consent to our using the email address to send you news, certificates and emails, including any notices required by law. We may also use your email address to send you other messages, including changes to features of the Service and special offers. You can unsubscribe from receiving all emails sent through our system. It may take up to 24 hours for us to process an unsubscribe request. You may have to unsubscribe from multiple emails before you stop receiving all communications. Opting out may prevent you from receiving email messages regarding updates, improvements, or offers.

6.2. After you opt out of all communications, we will retain your Personal Data and Non-Personal Data in accordance with this Privacy Policy, however, we will no longer use it to contact you.

6.3. We may store Personal Data itself or such information may be included in databases owned and maintained by our affiliates, agents or service providers. We take what we believe to be reasonable steps to protect the Personal Data provided via the Service from loss, misuse, unauthorized access, inadvertent disclosure, alteration, and destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from the Service may not be secure. Therefore, you should take exceptional care in deciding what

information you send to us via e-mail. Please keep this in mind when disclosing any Personal Data via the Internet.

7. ACCESS TO YOUR INFORMATION

AlumnUSB subscribers may access and update their Personal Data being stored by us by logging in and visiting the Dashboard page. AlumnUSB may also contact us directly at the address specified below with respect to Personal Data that is not accessible through the Settings page. Supporters and other non-Account Holders can also contact us directly with requests to update Personal Data at the address specified below. We will take reasonable steps to respond to requests relating to Personal Data within 30 days, however, we may reject requests that we find to be unreasonable (i.e., require disproportionate efforts or material changes to our information systems), impractical or abusive (i.e., repetitive requests, requests made in bad faith, requests that would compromise third party information). Note that you may not have access to or the ability to update Non-Personal Data, much of which is held in aggregate form.

8. DELETION RIGHTS REQUEST

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain rare exceptions. Simply send a request for “Deletion of Data” to contact@alumnusb.org

Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless one of the following exceptions applies where the information is necessary for us or our service providers to:

- (i). Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (ii). Debug products to identify and repair errors that impair existing intended functionality.
- (iii). Exercise free speech, ensure the right of another donor or subscriber to exercise their free speech rights, or exercise another right provided for by law.
- (iv). Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent.

(v). Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

(vi). Comply with a legal obligation.

(vii). Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

9. TECHNOLOGY AND SECURITY

9.1. We use a variety of security measures, including encryption and authentication tools, to maintain the confidentiality of your Personal Data. Your Personal Data is stored behind firewalls and is only accessible by a limited number of people who are required to keep the information confidential.

9.2. When you place orders, submit data, or donate through our Service, we use a secure server. To the extent you select the secure server method and your browser supports such functionality, all credit card information you supply is transmitted via Secure Socket Layer (SSL) technology. Regardless of these efforts by us, we cannot guarantee any data transmission over the public Internet is 100% secure.

10. TRANSFER TO THE U.S. OR OTHER COUNTRIES

We currently use datacenter facilities located exclusively in the United States. Your information will be stored and processed in the United States or other countries where we decide to maintain datacenter facilities in the future. By using the Services, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards. For any Personal Information that may be transferred from the European Economic Area, please see the EU Residents section below, including details about our Privacy Shield certification.

10. CHANGES TO THIS PRIVACY POLICY

The Services and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time by posting the latest version of this Privacy Policy on our websites. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated at the top of this page. Your continued use of the Service after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

AlumnUSB
contact@alumnusb.org