

PRIVACY POLICY FOR A TRUE CHANGE NON-PROFIT ORGANIZATION

This Privacy Policy describes how A True Change gather, use, and share information in connection with your use of our websites services. This Privacy Policy does not apply to information our clients may process when using our Services.

We may collect and receive information about users of our Services from various sources, including: (i) information you provide through your user account on the Services (your "Account") if you register for the Services; (ii) your use of the Services; and (iii) from third-party websites, services and partners.

Please read this Privacy Policy for your information. If you have any questions, please contact us. This Privacy Policy may be modified from time to time.

A True Change does not knowingly collect information from children under the age of 13, and children under 13 are prohibited from using our Services. If you learn that a child has provided us with personal information in violation of this Privacy Policy, please report it.

We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to

other countries, we will protect that information as described in this Privacy Policy.

1. Data we collect, cookies & tracking technology

We may ask for your contact information, including items such as name, company name, address, email address and telephone number. When you add your financial account information to your Account, that information is directed to our third-party payment processor. We do not store your financial account information on our systems; however, we have access to, and may retain, subscriber information through our third-party payment processor. If you contact us directly, we may receive additional information about you and/or attachments you may send us, and any other information you may choose to provide. We may also receive a confirmation when you open an email from us.

Like most websites, we may gather certain information automatically and store it in log files. We may collect certain information automatically from your device. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, landing page and referring URL. To collect this information, a cookie may be set on your computer or device when you visit our Services. Cookies contain a small amount of information that allows our web servers to recognize you. We store information that we collect through cookies, log files and/or clear gifs to record your preferences. We may also automatically collect information about your use of features of our Services, about the functionality of our

Services, frequency of visits and other information related to your interactions with the Services. We may track your use across different websites and services. In some countries, including countries in the European Economic Area ("EEA"), the information referenced above in this paragraph may be considered personal information under applicable data protection laws.

When you use our Services, we may collect information about your engagement with and utilization of our Services. We use this data to operate the Services, maintain and improve the performance and utilization of the Services, develop new features, protect the security and safety of our Services and our customers and provide customer support. We also use this data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions and report on the performance of our business.

If you choose to link our Services to a third-party account, we will receive information about that account, such as your authentication token from the third-party account, to authorize linking. If you wish to limit the information available to us, you should visit the privacy settings of your third-party accounts to learn about your options. We may also receive publicly available information about you from our third-party partners and combine it with data that we have about you. **We are not responsible for the privacy policies and/or practices of these third-party services, and we encourage you to carefully review their privacy policies.**

2. Use of information & choices you have

We use the information we collect in various ways, including the following: provide, operate, and maintain our Services; improve and expand our Services; understand and analyze how you use our Services; develop new products, services, features and functionality; communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Service and for marketing and promotional purposes; process your transactions; find and prevent fraud; and for compliance purposes, including enforcing our Master Agreement, or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency. You may unsubscribe from receiving certain promotional emails from us. If you wish to do so, simply follow the instructions found at the end of the email. Even if you unsubscribe, we may still contact you for informational, transactional, account-related or similar purposes. Many browsers have an option for disabling cookies, which may prevent your browser from accepting new cookies or enable selective use of cookies. Please note that, if you choose not to accept cookies, some features and the personalization of our Services may no longer work for you. You may continue to receive advertising material, but it will not be tailored to your interests.

3. How information may be shared

We may share the information we collect in various ways, including the following:

- A. **Vendors and Service Providers.** We may share information with third-party vendors and service providers that provide services on our behalf, such as helping to provide our Services, for promotional and/or marketing purposes and to provide you with information relevant to you such as product announcements, software updates, special offers or other information.
- B. **Aggregate Information.** Where legally permissible, we may use and share information about users with our partners in aggregated or de-identified form that can't reasonably be used to identify you.
- C. **Third-Party Partners.** We also share information about users with third-party partners in order to receive additional publicly available information about you.
- D. **Information We Share When You Sign Up Through a Referral.** If you sign up for our Services through a referral from a friend, we may share information with your referrer to let them know that you used their referral to sign up for our Services.
- E. **Analytics.** We use analytics providers such as Google Analytics, Clicky and Pardot. These Providers may use cookies to collect non-identifying information.
- F. **Business Transfers.** Information may be disclosed and otherwise transferred to any potential acquirer, successor or assignee as part of any proposed merger, acquisition, debt financing, sale of assets or similar transaction, or in the event of insolvency, bankruptcy or receivership in which information is transferred to one or more third parties as one of our business assets.
- G. **As Required By Law and Similar Disclosures.** We may also share information to (i) satisfy any applicable law,

regulation, legal process or governmental request; (ii) enforce this Privacy Policy and our Master Agreement, including investigation of potential violations hereof; (iii) detect, prevent or otherwise address fraud, security or technical issues; (iv) respond to your 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 spam/malware prevention.

H. With Your Consent. We may share information with your consent.

4. Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you; (ii) where the processing is in our legitimate interests and not overridden by your rights; or (iii) where we have your consent to do so. We have a legitimate interest in operating our Services and communicating with you as necessary to provide these Services, for example when responding to your queries, improving our platform, undertaking marketing or for the purposes of detecting or preventing illegal activities.

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those

of another person. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

5. Security & retention

A True Change is committed to protecting your information. We use a variety of security technologies and measures designed to protect information from unauthorized access, use or disclosure. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. However, please bear in mind that the internet cannot be guaranteed to be 100% secure. We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.