

UPAYA SOCIAL VENTURES PRIVACY POLICY
Last Revised: January 2, 2018

Upaya Social Ventures (“**Upaya**,” “**we**,” “**us**,” “**our**”) respects and values your privacy. This Privacy Policy (“**Policy**”) describes how we collect, use, store, process and share the personal and private information we receive from you in relation to your access and use of www.upayasv.org (the “**Site**”). By visiting, accessing or using the Site, you expressly consent to the collection, use, storage, transfer, processing and disclosure of your information, including personally identifiable information, as described in this Policy. IF YOU DO NOT AGREE WITH THIS POLICY, DO NOT ACCESS OR USE ANY PART OF THE SITE. .

1. INFORMATION COLLECTION

(a) General. When you visit the Site, you can browse without submitting any personally identifiable information about yourself. We may, however, receive and store some non-personally identifiable information about you, as described below. In order to participate in certain functionalities, you may be asked to provide personally identifiable information. “Personally identifiable information” is information that would allow us to actually identify you, such as your name, postal address, email address, telephone number or any other information the Site collects that is defined as personal or personally identifiable information under applicable law.

(b) Donations; Payment Information. If you make a donation to Upaya via the Site, whether on your behalf or in honor of another individual or entity, we request certain personally identifiable information from you on our payment form, including, but not limited to, donor name, email address, and payment card information (including card number, expiration date, verification code, and billing address). We use third party services Stripe, Form Assembly, and PayPal to assist in securely processing your personally identifiable payment information, including recurring charges (if any). We do not store your credit card information and do not control and are not responsible for the Stripe, Form Assembly, or PayPal or their collection or use of your information. You may find out more about how these services store and use your credit card information by accessing their respective privacy policies ([Stripe](#), [Form Assembly](#), [PayPal](#)).

(c) Communications; Email Address Collection. If you send us personal correspondence, such as emails or letters; or if you wish to receive email updates regarding news related to Upaya and our partner entrepreneurs; or if you wish to use the “Contact Us” feature within the Site, we collect and store the personal information you provide including your first name, last name, e-mail address, and your message. Upaya does not sell, share, rent or trade this information to third parties. Any email you receive from us regarding news updates and donation solicitations will include an unsubscribe link that will allow you to opt-out of receiving future emails.

(d) Surveys and Questionnaires. We may anonymously collect user responses to polls and survey on the Site. These polls and surveys are administered by third parties (currently [Squarespace](#) and [SurveyMonkey](#)). We are not responsible for any information provided to Squarespace or SurveyMonkey in connection with such polls or surveys.

(e) Job Applications. We may collect personally identifiable information if you apply for available job openings or volunteer positions through the Site. This information includes, but is not limited to, your name, email address, postal address, phone number, and work history. We use a third party service provider (currently Squarespace) to assist in securely processing this information. You may find out more about how Squarespace stores and uses your information by accessing the [Squarespace Privacy Policy](#). We are not responsible for Squarespace or its collection or use if your information.

(f) Accelerator Program Applications. We may collect personally identifiable information if you apply to the Upaya Accelerator Program through the Site. This information includes, but is not limited to, your name, email address, and specific information regarding your entrepreneurial business. We use third party service providers (currently Squarespace and Form Assembly) to assist in securely processing

this information.

(g) Automatically Collected Information. Similar to other websites, we may collect some information automatically from you and store it in log files. We use third party analytics providers to collect this information about the Site. This collection may include, but is not limited to: your domain name and host for Internet access, the Internet address of the site from which you came, the date and time of your access, your computer's IP address and information about its operating system, browser, and host, the date and time you access the Site and the pages you visit. Generally, this statistical data about your browsing actions does not directly identify you. We collect this non-identifying information in order to help diagnose problems and improve the quality of the Site. We may automatically collect information using various tracking technologies, including but not limited to cookies and web beacons.

i. Cookies. A cookie is a small text file that is stored on a computer or smartphone for record-keeping purposes. Our third party analytics providers use cookies to record information about your activities while using the Site and to "remember" you when you return to the Site. Some cookies remain on your computer or device until you delete them. Others, like session ID cookies, expire when you close your browser. You may set your browser or device setting to attempt to reject cookies and you may still use the Site, however, certain features of the Site may not be available if your browser or device does not accept cookies. See the section titled "Do Not Track Settings" below for more information on how the Site may respond to your browser or device settings. We do not control the use of cookies by third parties. See also "Third Party Analytics Providers" and "Google Analytics" below.

ii. Web Beacons. Web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) are tiny graphics with a unique identifier that are used to track the online movements of web or mobile app users. Unlike cookies, which are stored on a computer's hard drive or your smartphone, web beacons are small graphics that are about the size of the period at the end of the sentence that are embedded invisibly on, for example, web pages or in HTML-based emails. Our third party analytics providers may place web beacons on the Site that track what other websites you visit (both before and after visiting the Site). Our third party analytics providers use information obtained from web beacons to help us improve our organization and the Site. We do not control the use of web beacons by third parties.

(h) Third Party Analytics Providers. We use third parties, including Google Analytics, to help us operate and improve the Site. In doing so, we may share with these third parties non-personally identifiable information about users' use of the Site. These third party providers also use tracking technologies to collect information about you and your device. We do not control information collected by third parties and are not responsible for their use of that information.

(i) Google Analytics. Google Analytics uses cookies and web beacons in order to collect demographic and interest-level information and usage information from users that access and use the Site, including, but not limited, to information about the pages where users enter and exit the Site and what pages users view on the Site, time spent, browser, operating system, device information, and IP address. Cookies and web beacons allow Google to recognize a user when a user visits or accesses the Site. Google uses the information it collects from the Site and other websites or services to share with us and other website operators information about users including, but not limited to, age range, gender, geographic regions, general interests and details about devices used to visit websites and purchase items. We take reasonable measures to prevent linking information we receive from Google with any of your personally identifiable information. For more information regarding Google's use of cookies and collection and use of information see the [Google Privacy Policy](#). To opt out of Google Analytics, please visit the [Google Analytics Opt-Out Page](#) to learn about opting out and installing the appropriate browser add-on.

(j) "Do Not Track" Settings. Because we track Site usage information through the use of cookies, web beacons and other tracking mechanisms, your selection of the "Do Not Track" option provided by your browser or smartphone may not have any effect on our collection of information via tracking technologies. The only way to completely "opt out" of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser and smartphone

to delete and disable cookies and other tracking/recording tools. However, getting a “Do Not Track” signal to work as you might want is difficult. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose, data still may be collected for another; and even if one website observes a “Do Not Track” signal, that website usually will not be able to control other websites.

(k) Linked Sites. The Site may contain links to third party websites (“Linked Sites”), including social media features such as Facebook, LinkedIn, or Twitter buttons. We are not responsible for the privacy practices or content of any Linked Sites and Linked Sites may collect personally identifiable information from you that is not subject to our control. The data collection practices of Linked Sites will be governed by that site’s privacy policy.

2. INFORMATION USE

(a) General. We will use your personally identifiable information to operate, manage, and administer the Site; to process your donations, acknowledge donors, and send payment receipts; to send event tickets; to communicate with you; to monitor Site usage; to improve the Site; and to provide you information about Upaya and our entrepreneurs. We may also use personally identifiable information to resolve disputes; to detect and protect against errors, fraud, and illegal activity; to assist law enforcement; to enforce this Policy; or for any other purpose described in this Policy or described to you at the time of collection.

(b) Communications. We may use your personally identifiable information to send you emails, notifications or other communications related to your use of the Site, your donations, and to respond to your inquiries or requests. You may not opt out of Site-related emails which are not promotional in nature. We may also send you emails that provide you with updates regarding Upaya and its entrepreneurs, as well as emails that solicit donations. If you would like to stop receiving messages from us or third parties, please click on the opt-out link in any non-Site related email you receive. Even if you opt out, you will continue to receive Site-related communications from us.

(c) Use of Non-Personally Identifiable and Aggregate Information. We may use non-personally identifiable information and aggregate information for any lawful purpose, including, but not limited to, analyzing trends, managing and administering the Site, tracking users’ movements, to improve our business and the Site. We may also share aggregate information with third parties to develop and deliver targeted advertising and to analyze and report on the advertising you see. In addition, we may share aggregate statistical information with our business partners. We may also combine your non-personally identifiable information and aggregate information with other non-personally identifiable information and aggregate information collected from other sources. We will take reasonable steps to ensure that aggregate information is never associated with you or your personally identifiable information.

(d) Information Retention. We may retain your information indefinitely, or as long as legally required or allowed, for our organization needs and in order to deter fraud or abuse of the Site. We may dispose of any information in our discretion without notice, subject to applicable law. We do not undertake any retention obligations through this statement.

3. INFORMATION DISCLOSURE

(a) Affiliated Entities and Service Providers. We may disclose your information, including personally identifiable information, to any affiliated entity or organization, partner and to agents and service providers to help us operate the Site, improve our organization or the Site and to provide services to us. These third parties may include customer service providers or providers that provide support for the Site. Use of information by affiliated entities and service providers will be subject to this Policy or an agreement at least as restrictive as this Policy. We will not share your personally identifiable information for marketing purposes or with other third parties for purposes unrelated to the Site without your explicit consent.

(b) Legal Requirements. In some cases, we may disclose your information, including personally identifiable information: (i) as required by any applicable law, rule or regulation; (ii) if we believe disclosure is needed to protect our rights, property or safety; (iii) to government regulators or law enforcement authorities in connection with any judicial proceeding, court order, subpoena or legal process served on us or the Site; and (iv) to respond to a physical threat to you or another person.

(c)

(d) Disclaimer. We cannot ensure that all of your personally identifiable information will never be disclosed in ways not otherwise described in this Policy. For example, a third party may unlawfully intercept or access transmissions or private communications, or other users of the Site may abuse or misuse your personally identifiable information. No transmission of data over the internet can be 100% secure.

4. INFORMATION SECURITY MEASURES

We exercise care in facilitating the transmission of information between your device or computer and the third party servers that operate and store information for the Site. The personally identifiable information we collect is stored in operating environments that are not available to the public. While we have mechanisms in place to safeguard your personally identifiable information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

5. CHILDREN'S PRIVACY

(a) The Service is not for or Directed Towards Children. While the Site is not intended for anyone under the age of 18, we do not intend to and will not knowingly collect any personally identifiable information from children under the age of 13. Children under the age of 13 are prohibited from using the Site. If we learn that we have collected information from a child under the age of 13, we will remove that information immediately and delete it from our servers. If you believe information from a child under the age of 13 has been provided to the Site, please notify us at: info@upayasv.org.

(b) California Minors. While the Site is not intended for anyone under the age of 18, if you are a California resident under age 18 and you believe your information has become publicly-available through the Site and you are unable to remove it, you may request removal by contacting us at: info@upayasv.org. When requesting removal, you must be specific about the information you want removed and provide us with specific information, so that we can find it.

6. YOUR CALIFORNIA PRIVACY RIGHTS; CALIFORNIA SHINE THE LIGHT LAW

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personally identifiable information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to info@upayasv.org or write us at: Upaya Social Ventures, P.O. Box 9603, Seattle, WA 98109.

7. CHANGES TO THIS POLICY

Upaya reserves the right to change this Policy at any time upon notice to you. We may give notice by making the updated Policy available on the Site or by any other reasonable means. You can access and review the most current version of this Policy at any time at <https://UpayaSV.org/PrivacyPolicy>. The updated Policy is binding on you as of the next date that you use the Site after the date of updated Policy. If you do not agree to the updated Policy, you must stop using the Site. Your continued use of the Site after the effective date posted at the top of this Policy will constitute your acceptance of the updated Policy.

8. ACCESSING OR UPDATING YOUR INFORMATION

You may access or update your personally identifiable information by contacting us at: info@upayasv.org. We will make good faith efforts to resolve requests to correct inaccurate information except where the request is unreasonable, requires disproportionate technical effort or expense, jeopardizes the privacy of others, or would be impractical.

9. PRIVACY QUESTIONS

If you have any questions about this Policy, please contact us at: info@upayasv.org.