



# Contribulet Privacy Policy

*Effective August 20, 2018*

## 1. SCOPE

This privacy policy applies to your use of the Contribulet Inc (hereafter referred to as CI) IOS App, Android App, and website for fundraising. It does not apply to your use of other sites, services, or applications, and it does not apply to information we collect through other methods or sources such as sites owned or operated by our affiliates or vendors. Please be sure to review the privacy policy of any site, service, or application that you use as privacy practices often differ.

## 2. COLLECTING PERSONALLY IDENTIFIABLE INFORMATION (PII)<sup>1</sup>

You generally do not need to provide us with Personally Identifiable Information to use most of the features on the Sites and Services, however, CI may collect Personally Identifiable Information about you through your use of our Services in a variety of ways as described below:

We may collect, store, and use the following kinds of personal information:

- Information you provide to us when you register on our IOS or Android App or on our website at [www.contribulet.com](http://www.contribulet.com), including your first name, last name, email address, and mobile phone number.
- Information you provide when you subscribe to a newsletter, respond to a survey, or other periodic report or notification that we provide, including your first name, last name, occupation, interests, and email address.
- Information about your visits to and use of the CI web application, including the pages you visited, access frequency, time and length of visits, and links clicked on. We may also use cookies, log files, web beacons, unique identifiers, location data and clear gifs information to use or enhance our services, eliminate the need to re-enter login information, and personalize the content.
- Information relating to your transactions using the CI IOS and Android Apps including information on the specific e-Gift Card(s) or Voucher(s) purchased, purchase amount,

<sup>1</sup> “Personally Identifiable Information” refers to information about you that, with reasonable efforts, may be used to identify you, such as your: first name, last name, birth date, addresses, email address, or phone number.

payment information<sup>2</sup> (including, but not limited to credit card information, PayPal account information, etc.), redemption amount and items purchased, redemption date, and redemption time.

- Information that you post to our Facebook, Instagram, or Twitter accounts for publication on the Internet, including the actual content of the post, user name, profile pictures, first name, and last name.
- Information contained in or relating to any communication that you send to us or send through email, including the content of your message, your name, and your email address.
- CI may also collect information about you from other publicly available sources. All information you make publicly available in any public or open forum, such as on a social network, or on another open Internet forum or website, will be considered public information for the purposes of this Policy, and may be accessed and collected by CI and others.

### 3. HOW WE MAY USE YOUR INFORMATION

We may use the information we collect from you in the following ways:

- To operate, maintain, improve, and provide the Services
- To personalize the content and product offerings based on your past choices.
- To administer a contest, promotion, survey or other site feature.
- For advertising and marketing, including customized and interest-based advertising
- To process your transactions.

### 4. DISCLOSING PERSONALLY IDENTIFIABLE INFORMATION TO THIRD PARTIES

If CI becomes aware that any authorized party is improperly using or disclosing information, we will take commercially reasonable steps to end or correct such improper use or disclosure.

We may disclose personally identifiable information we collect from you to the following third parties, for the purposes specified below:

- **Agents**

- Financial Partners for Payments

- Braintree (A PayPal Service) collects the payment information for the available payment

<sup>2</sup> If you make a purchase through the CI website or CI IOS and Android Apps, our third-party payment processing partners will require certain information to process the payment. The type of information required will vary depending upon the payment method you choose, and may include your: name, address, email address, phone number, date of birth, last four digits of your Social Security Number, driver's license number, or credit card number. Contribulet does not collect this payment information – our 3<sup>rd</sup> party processor - Braintree ([www.braintreepayments.com](http://www.braintreepayments.com)) maintains your payment information on their servers.

options on the Contribulet Platform including, but not limited to credit card information (VISA, Mastercard, etc.) and PayPal. Contribulet is constantly expanding the payment options to accommodate customer preferences.

- **Service Providers**

Mail Chimp – We use Mail Chimp on our email campaigns which include disclosing first names, last names, occupations, physical addresses, and email addresses.

Google Analytics – We use Google Analytics to assess website performance based on page visits and click-through rates. All information captured is anonymous.

- **Affiliates**

Contribulet Employees & Contractors – We may disclose your personal information (first name, last name, email address, phone number, and physical address) to our employees to:

- Address issues raised by you
- Conduct market research
- Help Merchants register their business on Contribulet
- Operate the platform in the normal course of business.

Merchant Partners – Marketing – Granting CI permission to send you promotional and administrative messages is a condition of our Terms of Use, and this permission may not be rescinded, unless the relationship between you and us is terminated. You may opt out of receiving promotional messages by using the features included in each message.

- CI may provide your contact information (email, phone number, name) to participating local merchants for promotional campaigns (i.e., discount vouchers, loyalty program) and advertising. You may opt out of receiving promotional messages by using the features included in each message.
- Other Disclosures – We may also disclose personally identifiable information we collect from you when we are required to do so by law, or when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or legal process served on Contribulet Inc.

## 5. MAKING CHANGES TO YOUR INFORMATION

The CI Application and website ([www.contribulet.com](http://www.contribulet.com)) does not maintain a process by which you can review and make changes to the personally identifiable information we collect from you.

Any questions, concerns, or suggestions should be sent to [info@contribulet.com](mailto:info@contribulet.com).

## 6. CHANGES TO THIS PRIVACY POLICY

We may modify this privacy policy at any time. If we do, we will post the updated version on our website- [www.contribulet.com](http://www.contribulet.com) ). You should periodically check here for the most up-to-date version of this privacy policy. Any changes to the privacy policy will not be retroactively applied and will not alter how we handle personally identifiable information we previously

collected from you.

## **7. CALIFORNIA ONLINE PRIVACY PROTECTION ACT**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. - See more at:

### **According to CalOPPA we agree to the following:**

- Users can visit our site anonymously.
- Once this privacy policy is created, we will add a link to it on our home page or as a minimum on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can be easily be found on the page specified above.
- Users will be notified of any Privacy Policy changes: On our Privacy Policy Page
- Users can change their personal information: By logging in to their account

## **8. RESPONSE TO DO NOT TRACK SIGNALS**

Certain web browsers may provide an option by which you may have the browser inform websites or internet services you visit that you do not wish to have personally identifiable information about your activities tracked by cookies or other persistent identifiers across time and across third-party Internet websites, online or cloud computing services, online applications, or mobile applications. These are commonly called “do not track” signals. We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

We do not allow third parties to collect personally identifiable information about a user’s online activities, over time and across different sites, services, and applications, when that user uses our site, service, or application.

## **9. HOW WE PROTECT YOUR INFORMATION**

Our website is scanned on a regular basis for security holes and known vulnerabilities to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive bank or PayPal information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information. However, since no data security protocol is impenetrable, however, CI cannot guarantee the security of our systems or databases, nor can we guarantee that Personally Identifiable Information we collect about you will not be breached, intercepted, destroyed, accessed, or otherwise disclosed without authorization. As a result, any information you transfer to or from Services is provided at your own risk.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Please do your part to help us keep your information secure. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and CI, always. Your privacy settings may also be affected by changes the social media services you connect to CI make to their services. We are not responsible for the functionality, privacy, or security measures of any other organization.

## **10. COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)**

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

## **11. FAIR INFORMATION PRACTICES**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

To be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

- We will notify users via email within 7 business days
- We also agree to the Individual Redress Principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

## **12. CAN SPAM ACT**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect email addresses to:

- Send information, respond to inquiries, and/or other requests or questions.
- Process fundraising requests
- We may also send additional information related to your business.

To be in accordance with CANSPAM we agree to the following:

- NOT use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [info@contribulet.com](mailto:info@contribulet.com) and we will promptly remove you from ALL correspondence.

### **13. HOW TO CONTACT CI**

If there are any questions regarding this Privacy Policy, you may contact us using the information below.

Contribulet, Inc.  
1298 KIFER RD STE 505  
SUNNYVALE CA 94086-5320  
USA