

Privacy Policy for Websites AlumnIQ

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Privacy Policy for Websites

The generic use and disclosure of personal information that is collected from the individuals online, through websites

AlumnIQ Privacy Policy

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1.0 Introduction

AlumnIQ is dedicated to helping alumni and friends interact with our sponsoring institutions through the use of a secure and efficient engagement platform. This platform includes publicly-facing services for event registration, online giving, email subscription management, membership management, profile management, and directory services. In order to provide these services, we collect personally identifiable information about you (and your guests, at times). Our Privacy Policy noted below works in conjunction with our Terms and Conditions.

For more information about our services, please refer to our website:

https://www.alumniq.com

This Privacy Policy is applicable to AlumnIQ ("we," "our," or "us") as related to our services, which collectively include:

- the use of www.alumnig.com ("website")
- social media messages and marketing campaigns and
- the use of our products and services.

Most of the data collected, managed, or derived by the AlumnIQ platform is owned by the Sponsoring Institution, and we do not have ownership of it in any form or fashion. Because of that, we have no right, permission, nor responsibility to disseminate it to any third parties for purposes beyond operation of the platform - and therefore do not.

This Privacy Policy sets out the essential details relating to your personal data relationships with AlumnIQ as:

- · A website visitor
- An end user of our applications ("end user")
- A prospective client
- A job applicant and
- Partner

Clients contract the use of our application and give access to their employees and other third parties, as solely decided by them, by creating users who access the application with their email address and credentials. The clients' administrators grant end users roles, which result in different permissions and access rights to the information held in the Client account.

2.0 Personal Information We Collect

2.1 Information You Choose to Provide to Us

WHEN

We may ask you to provide personal information when:

- You request a trial or demo.
- You connect with us directly via phone calls or video conferencing platforms.
- We or Client Account Administrators grant you access to the application.
- You or Client Account Administrators upload or enter personal information into the application.
- You participate in a marketing/sales promotion.

- You attend trade events and other industry networking events.
- You register for or attend a webinar or other event.
- You participate in programs we may offer from time to time.
- You participate in chats.
- You pay for our services.
- You access one of our services provided by a Sponsoring Institution.

WHAT

Personal information means any information that may be used to identify an individual. We collect personal information when you register yourself and your guests to participate in an event, purchase a membership, make a gift, or otherwise engage with our systems that may include details such as: name, e-mail address, mailing or billing address, relationship to the sponsoring institution, job title, phone number(s), dietary and mobility needs, opt-in permission for text messaging, and opt-in permission for inclusion on a public who's coming list. We encourage your due diligence when completing these actions. For prospects, leads, and partners we'll collect name, employer, title, email, and/or phone number depending on the extent to which we engage with you.

2.2 Information We Collect Automatically

WHEN

We collect information about your visits to the website and the application when you land on any of our web pages through cookies and similar tracking technology.

WHAT

The non-personal information collected is not used by us to personally identify you and is not readily usable for that purpose. We use analytic and reporting technologies to record non-personal information to gain knowledge and best develop our product to meet our customers needs.

The information collected includes:

- access times
- the pages you view
- the links you click on
- the search terms you enter
- actions you take in connection with any of the visited pages
- your device information such as operating system, IP address, location, browser type, screen size, and language
- the Uniform Resource Locator (URL) of the website that referred you to our website and
- the URL you browse away from our pages if you click on an external link

None of this information is collected if your browser is set to pass the do not track identifier. We may also collect information when you open email messages from us or click on links within those email messages.

2.3 Information We May Collect From Third Parties

WHEN

Never

WHAT

We do not enlist third party services to enrich our lead or prospect data.

3.0 How We Use Personal Information

We use your personal information to:

- Deliver the contracted services and allow full use of the application functionality as purchased by Sponsoring Institutions.
- Deliver training and support to our application end users and/or carry out the transactions you have requested.
- To communicate with you directly through emails, calls, chats, video conferencing.
- Process payments.
- Send you notifications through email and or text messages related to an event.
- Generate a publicly posted who's coming list for which you have opted in.
- Generate sales leads and increase our market share.
- Analyze user clicks and usage of the application and website to improve user experience and maximize usage of our services.
- Manage our website and application to maintain and deliver enhanced functionality and services.
- Enforce our website and application terms and/or separate contracts (if applicable) with you.
- Prevent fraud and other prohibited or illegal activities.
- Protect the security or integrity of the website, application, our business or services.
- Or otherwise, as disclosed to you at the point of collection or as required or permitted by law.

We do not sell, rent, or otherwise provide personally identifiable information to third parties, with the exception of the service providers listed below who provide services related to core application functionality, and only to the extent necessary to do so. They are prohibited from using that information for any other purpose and we will not engage with service providers who would do so. In extremely limited circumstances, we may share personally identifiable information in order to enforce our legal rights or enforce the legal rights of a third party, or as we in good faith believe we are required to do so by law (such as to comply with a subpoena or court order, for example).

Please note that sometimes we may record the video conferencing call in which you participate to analyze and improve our staff's communication skills. If we do so, we will be announcing it at the beginning of the conference call or webinar.

We have never sold your information to any third party. We do not sell your information to any third party. We will not sell your information to any third party.

4.0 How We Share Personal Information

Our Application and Services

If you are an end user of our application, your personal information may be viewed by other users with access to the application.

Service Providers

We use third parties to help us provide our services. They will have access to your information as collected by the website or the application, as reasonably necessary to perform the contracted tasks on our behalf. We sign contractual agreements to obligate them to protect the personal information, only use it to deliver the contracted services to us, prohibit them from selling it and not disclose it without our knowledge and permission (which would never be given).

Service Provider Name	Business Purpose	Information Collected by the Service Provider
Double The Donation		Name, email address, physical address, employer, gift amount, gift metadata
Google Analytics	Marketing campaign tracking and effectiveness, Recaptcha for bot prevention	URL, browser information, user activity on pages

Pobox	Life-long campus email address forwarding	Campus email address alias, forwarding email address
Bee Content Design	Rich text editor for website pages and email messages	None
Mailgun	Email Service Provider	Name, email address
Twilio	SMS Service Provider, VOIP Service Provider	Name, phone number
Initium	Address data cleansing	Name, physical address
Spreedly	Payment gateway	Name, billing address, credit card details
Braintree Payments	Payment gateway	Name, billing address, credit card details
Blackbaud Payment Services	Payment gateway	Name, billing address, credit card details
Sentry	Browser error tracking	Browser metadata, user session contents, network and javascript errors
GitHub	Source code hosting and management	None
Amazon Web Services	Cloud infrastructure hosting	None

Legal Disclosures

It is possible that we may need to disclose personal information when required by law, subpoena or other legal processes as identified in the applicable legislation.

We attempt to notify our clients about legal demands for their personal data when appropriate in our judgment unless prohibited by law or court order or when the request is an emergency.

Change in Control

We can also share your personal data as part of a sale, merger, change in control or in preparation for any of these events.

Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

5.0 How We Secure Personal Information

We are committed to protecting the security of all of the personal information we collect and use.

We use a variety of physical, administrative and technical safeguards designed to help protect it from unauthorized access, use and disclosure. We have implemented best-practice standards and controls in compliance with internationally recognized security frameworks. We use encryption technologies to protect data at rest and in transit.

6.0 Your Rights

We provide the same suite of services to all of our clients and end users worldwide.

We offer the following rights to all individuals regardless of their location or applicable privacy regulations.

For personal information we have about you, you can:

· Access your personal information or request a copy.

You have the right to obtain information about what personal information we process about you or to obtain a copy of your personal information.

If you have provided personal information to us, you may contact us to obtain an outline of what information we have about you or a copy of the information. If this data is owned by the Sponsoring Institution, such request should be routed through them.

• You have the right to be notified of what personal information we collect about you and how we use it, disclose it and protect it.

This Privacy Policy describes what personal information we collect and our privacy practices. We may also have additional privacy notices and statements available to you at the point of providing information to us directly.

• Change or correct your personal information.

You have the right to update/correct your personal information or ask us to do it on your behalf.

Delete or erase your personal information.

You have the right to request the deletion of your personal information at any time. We will communicate back to you within reasonable timelines the result of your request. We may not be able to delete or erase your personal information, but we will inform you of these reasons and any further actions available to you.

• Object to the processing of your personal information.

You have the right to object to our processing of your personal information for direct marketing purposes. This means that we will stop using your personal information for these purposes.

• Ask us to restrict the processing of your personal information.

You may have the right to ask us to limit the way that we use your personal information. The extent to which we can accommodate it will depend largely on the scope of that request is.

• Export your personal data.

You have the right to request that we export to you in a machine-readable format all of the personal information we have about you that is under our ownership.

If you would like to exercise any of the rights described above, please contact us athelpdesk@alumnig.com.

You also have the right to lodge a complaint with the local organizations in charge of enforcing the privacy legislation applicable in your territory.

7.0 How Long We Keep Your Personal Information

We retain information as long as it is necessary to provide the services to you and our clients, subject to any legal obligations to further retain such information.

We may also retain information to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce our Terms of Service and take other actions permitted by law.

The information we retain will be handled following this Privacy Policy.

Information connected to you that is no longer necessary and relevant to provide our services will be deleted per our data retention and backup policy.

8.0 Other Important Information

We process data in the United States of America (USA) and rely on legally-provided mechanisms to lawfully transfer data across borders, such as contracts incorporating data protection and sharing obligations.

We will only collect and process your personal data where we have a lawful reason for its collection.

When you visit our website and provide us with your personal information, we collect and use it with your consent.

As an application end user, you consent to our collection of your personal information when you log in. Your employer's responsibility is to ensure that collecting, using and sharing the personal information associated with your account complies with all applicable legislation.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact us at helpdesk@alumnig.com.

How to select your communications preferences

You may choose to receive or not receive marketing communications from us. Please click the "Unsubscribe" link in the email we sent you to stop receiving marketing communications.

You may choose which information we collect automatically from your device by controlling cookie settings on your browser.

Even if you opt-out of receiving marketing communications, we may still communicate with you regarding security and privacy issues, servicing your account, fulfilling your requests, or administering any promotion or any program in which you may have elected to participate.

9.0 Contact Information

You may contact us to exercise any of your rights or ask for more information about your personal information and our privacy practices by contacting us at helpdesk@alumnig.com.

Appendix

A.1 For Individuals Based in the European Union (EU), European Economic Area (EEA) and Switzerland

If you are based in one of these jurisdictions, AlumnIQ is the controller of your personal data collected in the following instances:

- When you visit our website
- When we process your personal data for sales and marketing purposes

AlumnIQ is a processor of all personal data processed on the application, on behalf of our clients. We only process the personal data under their direction. Please contact your employer or the organization that granted you access to the application for details on their privacy practices.

We only process personal data if we have a lawful basis for doing so. The lawful bases applicable to our processing as controller are:

- **Consent:** We will ask for your express and informed consent every time we collect your personal data on this legal basis.
- **Contractual basis**: We process the personal data as necessary to fulfill our contractual terms with you or our clients.
- **Legitimate interest**: We process the names, contact details, job titles, companies of our existing and prospective clients for our marketing purposes, including market research and sales leads generation.

You have the following rights under the GDPR:

- Be informed about the collection and use of your personal data
- · Access your personal data
- Correct errors in your personal data
- Erase your personal data
- Object to the processing of your personal data.
 - This right is also available to individuals whose personal data is processed by us for direct marketing purposes. If you object to the processing of your personal data for direct marketing purposes, we shall stop processing within 30 days of receipt of your request.
- Export your personal data
- Restrict our processing of your personal data for specific reasons, including any of the purposes supported by the legitimate interest legal bases (see the section above).
- Not to be subject to a decision based solely on automated decision making.

We process personal data in the United States of America (USA) and share it with our service providers in the USA and other jurisdictions. We use standard contractual clauses, approved by the European Commission or competent UK authority (as applicable), as the data transfer mechanism for transferring personal data from the EEA or UK to other countries subject to data transfer requirements. See the table of our service providers above.

You may contact us at helpdesk@alumnig.com.

You may also lodge a complaint with your local supervisory authority:

- EU Data Protection Authorities (DPAs). See their contact details here National Data Protection Authorities.
- Information Commissioner's Office (ICO)
- Swiss Federal Data Protection and Information Commissioner (FDPIC).

A.2 For Individuals Based in California

This section provides additional specific information for consumers based in California as required by the California Consumer Privacy Act of 2018 ("CCPA") and the California Privacy Rights Act of 2020 ("CPRA") - which significantly amends and expands the CCPA.

A.2.1 Collection and Use of Personal Information

In the last 12 months, we have collected the following categories of personal information:

- Identifiers, such as your name, mailing address, email address, zip code, telephone number or other similar identifiers
- California Customer Records (Cal. Civ. Code § 1798.80(e)), such as username and password, company name, job title, business email address and department
- Internet/network information, such as your browsing history, log and analytics data, information about the device(s) used to access the services and information regarding your interaction with our websites or services and other usage data
- Geolocation data, such as information about your location (at country and city level) collected from your IP address
- Sensory Information, the content, audio and video recordings of conference calls between you and us that we record where permitted by you and/or the law
- Profession/employment information that you send to us when applying for a position included in your CV and cover letter
- Other personal information, such as personal information you provide to us in relation to a survey, comment, question, request, article download or inquiry and any other information you upload to our application

We collect personal information directly from you, from your browser or device when you visit our websites, from third parties that you permit to share your information or from third parties that share public information about you, as stated above.

See the section above, "How We Use Personal Information," to understand how we use the personal information collected from California consumers.

A.2.2 Recipients of Personal Information

We share personal information with third parties for business purposes. The categories of third parties to whom we disclose your personal information includes:

- i. our service providers and advisors, and
- ii. analytics providers.

The categories of third parties to whom the sponsoring organization may share personal information with may include:

- i. their service providers and advisors,
- ii. marketing and strategic partners;
- iii. ad networks and advertising partners;
- iv. analytics providers; and
- v. social networks.

The policies for information sharing done by the sponsoring organization are theirs to define.

Please see the "How We Share Information" section of the Privacy Policy above for more information.

A.2.3 California Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- The right to know any or all of the following information relating to your personal information that we have collected and disclosed in the last 12 months (upon verification of your identity):
 - The specific pieces of personal information we have collected about you
 - The categories of personal information we have collected about you
 - The categories of sources of the personal information
 - The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed
 - The categories of personal information we have sold and the categories of third parties to whom the information was sold, and
 - The business or commercial purposes for collecting or selling the personal information.
- The right to request deletion of personal information we have collected from you, subject to certain exceptions.
- The right to opt-out of personal information sales to third parties now or in the future. However, **we do not sell** your personal information.
- The right to opt-in to personal information sales to third parties for consumers under the age of 16. However, **we do not sell** personal information of minor consumers.

You also have the right to be free of discrimination for exercising these rights.

In addition to the rights mentioned above, the CPRA grants California residents with the following additional rights:

- The right to opt-out of sharing of personal information to third parties now or in the future.
- The right to request rectification/correction of inaccurate personal information, considering the nature and purposes of the processing of the information.
- The right to limit use and disclosure of sensitive personal information to that which is necessary to perform the services or provide the goods reasonably expected by an average consumer

Please note that if exercising these rights limits our ability to process personal information (such as a deletion request), we may no longer be able to provide you with our products and services or engage with you in the same manner.

A.2.4 How to Exercise Your California Consumer Rights

To exercise your right to know and/or your right to deletion, please submit a request by contacting us at helpdesk@alumniq.com.

We will need to verify your identity before processing your request.

In order to verify your identity, we will generally require sufficient information from you so that we can match it to the information we maintain about you in our systems. Sometimes we may need additional personal information from you to be able to identify you. We will notify you.

We may decline a request to exercise the right to know and/or right to deletion, particularly where we cannot verify your identity or locate your information in our systems or as permitted by law.

You may choose to designate an authorized agent to make a request under the CCPA or CPRA on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Once an authorized agent has submitted a request, we may require additional information (i.e., written authorization from you) to confirm the authorized agent's authority.

If you are an employee/former employee of an AlumnIQ client that uses our application and services, please direct your requests and/or questions directly to your employer or former employer.

If you are a third party (auditor, business associate, etc.), who was given access to the AlumnIQ application by an AlumnIQ client, please direct your requests and/or questions directly to the AlumnIQ client that gave you access.

Minors Under Age 16

Our application and services are intended for business use, and we do not expect them to be of any interest to minors. We do not intentionally collect any personal information of consumers below the age of 16. We do not sell the personal information of California consumers.

A.3 For Individuals Based in Australia

This section is applicable to individuals whose personal information is collected, stored, used or disclosed by an APP Entity under the Australian Privacy Principles ("APPs") contained in the Privacy Act of 1988.

A.3.1 Providing Anonymous and Pseudonymous Options

You have the option of anonymity or using a pseudonym when dealing with AlumnIQ. However, this option may not be made available to you in certain cases, including if it's impractical for AlumnIQ to allow this option or when AlumnIQ is required or authorized to deal with an identified individual by or under the law.

A.3.2 Collection, Use and Disclosure of Personal Information

AlumnIQ collects personal information only by lawful and fair means. Additionally, AlumnIQ collects personal information directly from you or your authorized representative, unless we have your consent for collection from another source (i.e., third parties), it is required or authorized by law, or it is unreasonable to collect the information only from you. AlumnIQ may collect 'sensitive information' about you where you have consented to the collection and it is reasonably necessary for one of our functions or activities or if it is required or authorized by law.

AlumnIQ only uses and discloses your information for the purpose for which it was collected (the primary purpose) unless one or more of the following apply:

- You have consented
- You would reasonably expect the secondary purpose
- It is required or authorized by or under law
- AlumnIQ believes that it is reasonably necessary for an enforcement body's activities

We disclose your personal information with our service providers in <update name of locations> and other jurisdictions. We do not disclose your personal information to any overseas recipients unless one of the following

applies:

- You have consented to the disclosure
- The recipient is subject to a law or binding scheme substantially similar to the APPs, and you can enforce that law/binding scheme
- It is required or authorized by law
- It is required or authorized by an international agreement relating to information sharing
- It is reasonably necessary for an enforcement body's or similar entity's activities

See the table of our service providers above.

A.3.3 Your Rights Under the APPs

You have the following rights related to the collection, use and disclosure of your personal data:

- Be informed about the collection and use of your personal data
- Access your personal information
- Correction of your personal information to ensure accuracy and completeness
- Request to not receive direct marketing communications from us or to not disclose your personal information to others for direct marketing purposes

If you wish to access your personal information or correct that information, please contact us at helpdesk@alumniq.com. You may opt-out (unsubscribe) of receiving marketing communications by using the links provided in our emails. If you are unable to find the opt-out instructions, please contact us at helpdesk@alumniq.com for assistance.

If you are concerned about AlumnIQ's handling of your personal information, you may lodge a complaint in writing to either the mail or email address listed below and we will provide a written response to your complaint within a reasonable time (30 days).

helpdesk@alumnig.com

If you are not satisfied with our response, you may be able to submit a complaint to an external dispute resolution (EDR) scheme.

You may also complain directly to the Office of the Australian Information Commissioner (OAIC) by:

- Email: enquiries@oaic.gov.au (be aware that email isn't encrypted, if you're concerned about this, use the online form on OAIC's website which is secure)
- Mail: GPO Box 5218, Sydney NSW 2001 (send it by registered mail if you're concerned about sending it by standard post)
- Fax: 02 9284 9666