

Spiral Giving Network Privacy Policy

Effective May 30, 2023

The Spiral Giving Network Privacy Policy (the “Privacy Policy,” or the “Policy”) outlines how Spiral Giving Network (“SGN,” “we,” “us”, and “our”), a 501(c)(3) nonprofit public charity, sources, uses, discloses, and protects the personal information you (“you” or “your”) provide when you access or use any services, content, communications, and product features we offer, including those made available through third-party financial institutions (together, the “SGN Services” or the “Services”). This Policy does not apply to the practices of third-party websites, services, or applications.

1. Types of Information We Collect.

We collect two basic types of information from you when you provide it to us and when you use or interact with our Services: personal information and non-personal information.

Personal information includes all information that relates to you personally and either identifies or may be used to identify you personally (collectively, “personal information”). Non-personal information includes information that does not personally identify you or information that has been anonymized (collectively, “non-personal information”). When we combine non-personal information with personal information, we treat the combined information as personal information.

We may only collect the following, limited types of personal information from you depending upon the device you are using and how you interact with us or use or interact with our Services, such as your:

- Contact Information. Name, mailing address, email address, phone number, and other contact information.
- Demographic Information. Gender and date of birth.
- Device Information. IP address, browser type, and version, browser plug-in types and versions, operating system and platform, device type, device identifiers, and information about how you use and interact with our Services.
- Audio Information. Voice recordings when you contact SGN via telephone.
- Donation Information. The donation dollar amount, donation frequency (one-time or recurring), and information about the charities, organizations, and causes you are interested in.

We strive to uphold data minimization principles and only seek to collect personal information from you for the purposes described in this Privacy Policy.

You can always refuse to provide your personal information, but please note that some personal information is necessary to provide our Services.

2. How We Collect Personal Information.

We need to collect personal information from you in order to provide you with our Services, as well as to improve your experience. You may provide us with personal information in several ways, including, for example when you:

- Use giving services provided by Spiral Financial Inc., a technology provider;
- Use our Services;
- Correspond with us, including through questionnaires and surveys;
- Sign up to receive any newsletter or promotional information we may offer;
- Ask for customer service, support, or other assistance; or
- Interact with us in any other way, online or offline, including through our Services.

We also may collect personal information from other sources, including Spiral Financial Inc., business partners, third-party service providers, or from our offline interactions with you for the purposes listed in the How We Use Your Personal Information section below, including to enable us to verify or update the information contained in our records and to better customize the Services for you.

3. How We Use Your Personal Information.

SGN may use your personal information to:

- Deliver the Services and send you related communications.
- Provide you with the Services, prepare your donation-related tax receipts, resolve errors, and verify your identity. SGN may use certain transaction information to determine your eligibility for certain features of the Services.
- Administer surveys and questionnaires, such as for market research or customer satisfaction purposes.
- Analyze individual and aggregated behavior to improve and customize the Services and to develop new products and services.
- Prevent, detect, and investigate fraud, hacking, infringement, or other suspected or actual misconduct, crime, or violation of an agreement involving the Services.
- Collect fees and other amounts owed for the Services.
- Comply with obligations to tax authorities.
- Diagnose and debug our technical systems.
- Log and store this information.
- Comply with the law and our legal obligations, to respond to legal process and related to legal proceedings.
- Administer our general business, accounting, auditing, compliance, recordkeeping, and legal functions, including considering and implementing organizational combinations and restructurings, bankruptcies, and other business transactions.

We may also combine your personal information collected through various sources, including information collected through our Services, and develop a customer profile that will be used for the purposes above. Except as otherwise permitted or required by applicable law, we only retain personal information for as long as we need to use the information for the purposes listed above, including for legal, regulatory, backup, archival, accounting, and/or audit purposes. We may use personal information to create non-personal information. We may use non-personal information for any legitimate business purpose.

4. With Whom We Share Your Personal Information.

To accomplish the purposes outlined in the section above, SGN may disclose your personal information in order to provide our Services to you, to respond to and process your donations and requests, as otherwise directed or consented to by you, and as follows:

- Vendors and service providers. We may disclose the information we collect to our service providers, processors, and others who perform functions on our behalf. These may include, for example, IT service providers, help desk, payment processors, analytics providers, consultants, auditors, and legal counsel.
- Donation recipients. We will share your personal information, such as your name and contact information, with the charities to which you recommend donations. For donations made through the Giving Center, you may choose to opt out of sharing your personal information with the recommended charities and we will make a donation without identifying you to your donation recipient(s). For donations made through Everyday Impact, you will need to opt-in to choose to share your personal information with the recommended charity.
- In support of business transfers. If we may be acquired by, or merged with another organization, or if any of our assets are or may be transferred to another organization, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other organization. We may also share certain information as necessary prior to the completion of such a transaction or other corporate transactions and to third-party advisors, including attorneys and consultants, as part of due diligence or as necessary to plan for a transaction.
- Compliance and legal obligations. We may also disclose information to third parties to comply with our legal and compliance obligations and to respond to legal processes. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements. This may include regulators, government entities, and law enforcement as required by law or legal process. In addition, it may include certain disclosures that we are required to make under applicable laws, such as the names of sweepstakes and contest winners.
- Security and protection of rights. We may disclose information, including personal information where we believe doing so is necessary to protect the SGN Services, our rights and property, or the rights, property, and safety of others. For example, we may disclose personal information in order to (i) prevent, detect, investigate and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the SGN Services, (ii) situations involving potential threats to the health, safety or legal rights of any person or third party, or (iii) enforce, and detect, investigate and take action in response to violations of, our Terms and Conditions [[link](#)] or other agreements you

have with us. We may also disclose information, including personal information, related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.

5. SGN Never Sells Personal Information.

SGN does not sell your personal information to third parties for monetary compensation.

6. Updating Your Personal Information and Information Retention.

If you wish to modify, verify, correct, or update any of your personal information collected through the SGN Services, you may do so by emailing giving@spiralgivingnetwork.org. Please note that SGN may continue to use your de-identified data after you delete any of your personal information. There may be certain instances in which we will retain your personal information. Those instances may include but are not limited to providing you SGN Services, complying with our legal and tax obligations, resolving disputes, preventing fraud, or as otherwise permitted under law.

7. Security of Your Personal Information.

We have implemented safeguards that are intended to protect the personal information we collect from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Because no method of electronic transmission or storage is completely secure, we cannot and do not guarantee the absolute security of your personal information. You also play a role in protecting your personal information.

8. Do-Not-Track Settings.

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third parties. We do not use technology that recognizes DNT signals from your web browser and do not respond to such signals.

9. Children Under 13.

The SGN Services are not directed to children under 13 years of age and we do not knowingly collect, use, or disclose personal information from children under 13. If we become aware that a child under 13 has provided us with personal information, we will make reasonable efforts to delete such information from our files.

10. Your California Privacy Rights.

We do not share personal information with third parties for their own direct marketing purposes without your consent. California residents under 18 years old, in certain circumstances, may request and obtain the removal of personal information or content that you have posted on our Services. Please be mindful that this would not ensure the complete removal of the content posted by you on our Services. To make any request pursuant to California privacy law, please contact us using the information below.

11. Third-Party Websites and Apps.

Our website and Services may contain links to other websites or apps operated by third parties. Please be advised that the practices described in this Privacy Policy do not apply to information gathered through these third-party websites and apps. We have no control over

and are not responsible for, the actions and privacy policies of third parties and other websites and apps.

12. Changes to this Policy.

SGN may revise this Policy from time to time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy in connection with SGN Services. You can determine when this Policy was last revised by checking the “Last Updated” legend at the top of this Privacy Policy.

13. Difficulty Accessing Our Privacy Policy.

Individuals with disabilities who are unable to usefully access our online Privacy Policy may contact us to inquire how they can obtain a copy of our Privacy Policy in another, more easily readable format.

14. Questions About this Privacy Policy.

If you have any questions or concerns about this Policy, please contact giving@spiralgivingnetwork.org