

## **PRIVACY POLICY**

**Effective date:** 9.21.22

### **INTRODUCTION**

The Foundation United, (“the Foundation,” “we,” “our,” or “us”), respects your privacy and is committed to protecting it through our compliance with this privacy policy (the “Policy”).

The Foundation, a Florida-based 501(c)(3) non-profit organization, maintains this Policy to educate you about the information we may collect from you, or that you may provide to us when you interact with one of our Sites (defined below) or our Services (defined below), how we use and share that information, and your options with regard to our use of that information.

### **SCOPE OF THE POLICY**

This Policy applies to information collected through our websites ([www.thefoundationunited.org](http://www.thefoundationunited.org), and [www.thefoundationunited.com](http://www.thefoundationunited.com), [realtalkcollective.com](http://realtalkcollective.com)), any other websites that display or link to this Policy (collectively, the “Sites,” and this/the “Site” when referring to a single Site or the current Site you are viewing), and related services, including training or educational content offered through a Site or in person (the “Services”).

This Policy does not apply to websites, mobile apps, or other online products and services that have their own privacy policy or otherwise do not display or link to this Policy.

Importantly, the Foundation partners with other organizations that align with our mission and values; we, however, generally do not share information that may identify you collected through our Sites with other organizations unless it is necessary to connect you with their services or to fulfill a request for assistance you make to us, or unless we partner with another organization to host an event.

### **THIS POLICY IS PART OF OUR TERMS OF SERVICE**

This Policy is part of the [Terms of Service](#) that govern your use of this Site and our Services. Please take a few minutes to review this Policy and the Terms of Service to familiarize yourself with our practices and your obligations when using this Site and our Services (as defined in the Terms of Service). Your use of this Site constitutes consent to be governed by the Terms of Service and this Policy.

### **UPDATES TO THIS POLICY**

We review our privacy practices from time to time, which are subject to change. We ask that you periodically review this page to remain familiar with the most current version of our Policy. Information collected after the posted effective date will be treated in accordance with the then most current Policy. When this Policy changes, we will update the “Effective date” at the top of the page.

## **INFORMATION WE COLLECT**

In certain areas of the Site, we may ask you to submit information that identifies you as an individual (“Personal Information”) to us, and we may invite you to request information from us. In addition to any information that you may voluntarily provide, the Site may automatically collect information about you and your use of the Site.

### Information We Automatically Collect

We automatically collect information about your interactions with our Site, including information about the device you use to access the Site.

*Cookies and Device Identifiers.* A cookie is a small file placed on your device when you visit a website that can be understood by the website that issued the cookie. We use cookies and other technologies, including device identifiers, to collect information and support certain features of the Site. For example, we may use these technologies to:

- collect information about how visitors use the Site (for example, which pages they visit, which links they use, and how long they stay on each page);
- support the features and functionality of the Site (for example, to save a visitor the trouble of re-entering information already in our database or to prompt the settings they established on previous visits);
- personalize a visitor’s experience when they use the Site; and
- improve our marketing efforts, including targeted advertising.

We may use both session cookies and persistent cookies. A session cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. The information we collect using cookies and similar technologies may or may not be directly identifying of you, but we may link it to Personal Information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit our Site, you may be unable to use all of the functionality of the Site if your browser rejects cookies.

*Information from Your Computer or Mobile Device.* When you access the Site through your computer or mobile device, we may automatically collect certain information from and/or about your device, such as IP address, access dates and times, information about your approximate location (as determined through your IP address), hardware and software information, mobile and computer or hardware device information. This information allows us to understand how you’ve used the Site, and other actions you have taken in connection with your use of the Site. We automatically collect log data when you access and use the Site.

### Information You Provide to Us

*Event Registration or Volunteer Information.* When you register to attend an event you provide us with your basic contact information, including your name and email address, and other

information relevant to the event, if applicable (for example, your location or age). We use this information to better understand who you are and what content might be relevant for you, to

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communicate with you about the event, and to send you messages about our Services and donation opportunities.

*Request for Services.* When you request our Services (for example, training), you provide basic contact information, including your name, email address, and phone number, and information about your organization and role. In addition, although not required, you may also choose to include additional Personal Information in comments to your request.

*E-Mail Content and Newsletters.* You may choose to provide us with Personal Information in an email message to one of the addresses listed on our Site or by submitting your information in a “Contact” section of the Site. We use this information to respond to your message, fulfill your order, complete your event registration, or to register you for the Services you have purchased, and we may use it to promote to you or educate you about additional relevant Services. If you sign up for an email newsletter, you have the option to unsubscribe at any time. Any information you choose to provide regarding special interests may be used in fundraising and educational efforts or for promotional purposes. By providing this information, you may receive occasional email messages from the Foundation or an affiliated organization.

*Payment Information.* You may provide payment information, including credit card or financial account information, to pay for our Services or products purchased through the Site. This information is used only to fulfill the transactional purpose for which you submit it to us and may be processed by a third-party vendor on our behalf. We use a third-party payment processor to take payment for our products and Services.

*Additional Sources of Information.* You may provide additional information to us when you request information about our Services. We may receive this information from you through email, the Site, or over the phone. This information may be combined with other information received through the various channels through which you interact with us.

## **HOW WE STORE INFORMATION**

We use appropriate technical and organizational measures to ensure a level of security that is reasonable and appropriate to the risk of the Personal Information we hold. We leverage reputable vendors to assist in the provision of our Sites and Services. Unfortunately, the transmission of information over the Internet is not without risk, and although we implement appropriate and reasonable methods to protect your Personal Information, we cannot guarantee the security of that information. Any transmission of Personal Information through the Site is at your own risk and we are not responsible for circumvention of our security measures.

## **THIRD-PARTY ANALYTICS TOOLS**

Beyond the information you voluntarily provide to us directly, the Foundation utilizes analytics

tools, including third-party technologies such as Google Analytics, to collect information and help us understand how visitors engage with our Site. To learn more about Google Analytics, click [here](#). To learn more about how Google uses data collected through partner sites or applications, click [here](#).

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### **THIRD-PARTY ADVERTISING TOOLS**

When you use our Sites, third parties may deliver cookies or other tracking technologies, including web beacons or tracking pixels) to your computer or mobile device for the purpose of tracking your online behaviors across nonaffiliated websites, and to deliver targeted advertisements on other nonaffiliated websites. For example, our Sites may use the Facebook Pixel to better understand who visits our Sites and to provide you relevant targeted advertisements on other websites.

### **HOW WE USE INFORMATION**

We use the information we collect to provide you Services, enhance your experience on our Site, to improve our Services, and for fundraising, education, or promotional efforts. For more details about how we use information, please see below.

*Use of Information You Provide to Us.* Generally, we may use information you provide to us through the Site:

- to provide the information, content, products, and Services you request; • for security or fraud prevention purposes;
- to provide you with effective support;
- to provide you with a personalized experience when you use our Site; • to contact you with information and notices related to your use of our Site; • to better understand your needs and interests;
- to improve the content, functionality and usability of this Site;
- to improve our Services;
- to improve our fundraising, education, and promotional efforts; and
- for any other purpose identified in an applicable privacy notice, click-through agreement, or other agreement between you and us.

Please see “Your Choices” below for information about the choices you have about the ways we use the information we collect about you.

*Use of Aggregated Information.* We may use information gathered through the Site to create a compiled, aggregate view of the Site’s audiences and its visitors’ usage patterns. We use aggregated information to improve our content, operate our Services, and to better understand our audience as we develop new products and services. We may also share aggregated information—which no longer identifies any individuals—with our third-party service providers.

### **THIRD-PARTY DATA SHARING AND DISCLOSURE**

**To be clear, if you seek support services for yourself or someone else through our Sites or**

**Services we will not share your Personal Information with an unaffiliated third party without your permission and consent, unless a life is at risk, and then only to a first responder.** The sharing and disclosure described below applies to the general contact information we receive about persons requesting educational services, donors, or lists of supporters we may maintain, and information automatically collected about you and your device when you use our Sites.

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*Compliance with Law or Protection of Rights.* We may disclose information we collect, including your Personal Information, when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose your Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of the Site; to enforce or apply any applicable terms of use or other agreements; or to protect our own rights or property, or the rights, property, or safety of others.

*Business Negotiations.* We may contemplate, for strategic or other reasons, transferring ownership control of, merging, dissolving or otherwise reorganizing our organization. In negotiating with a third party about entering into such an arrangement, we may need to disclose your Personal Information. In such cases, we will take reasonable measures to protect the Personal Information we disclose, for example, by requiring a prospective partner or controlling entity to sign a non-disclosure agreement limiting the use and protecting the confidentiality of the information.

*Business Transfers.* We may transfer the information you submit on or through the Site, including Personal Information, to a partner or controlling entity or other successor in the event of a merger, divestiture, transfer of control, restructuring, reorganization, dissolution, or other transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Foundation, a subsidiary, or an affiliated company about our Site's or Services' users is among the assets transferred.

*Vendors.* We may from time to time retain third-party vendors in order to help us manage the Site and Services and allow us to better serve our users. These may include third-party vendors we engage to analyze the information we collect for fundraising or similar purposes.

We may contract with third parties who use cookies to collect information on our behalf. These parties maintain their own confidentiality and security standards. We may contract with companies or others to provide certain services, including payment services, data management and promotional services. We provide these service providers with the information they need to perform these services.

We may also share information, including Personal Information, to third-party vendors to help us provide the Services. For example, we may use a cloud-service provider to host information we collect or other aspects of our Services. Such vendors have access to Personal Information for a limited purpose and for a limited period of time.

We do not disclose personal information to third parties for their own direct marketing purposes.

## **LINKS TO THIRD-PARTY WEBSITES**

The Site may have links to other websites or resources over which the Foundation does not have control. Such links do not constitute an endorsement by the Foundation of those websites. You acknowledge that the Foundation is providing these links to you only as a convenience, and you further agree that the Foundation is not responsible for the content of

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such websites. Your use of such websites is subject to the terms of use and privacy policies located on the linked websites.

## **YOUR CHOICES**

*In General.* We respect your right to make choices about the ways your Personal Information is collected and used. For example, we will include instructions to unsubscribe from communications in each electronic newsletter or promotional email we send you.

*Unsubscribe from Newsletters or Promotional Communications.* We want to provide you information that is valuable to you. If at any time you wish to be taken off our mailing lists, please follow the unsubscribe instructions included in our communications to you or contact us by email at [info@thefoundationunited.org], or by mail at the address listed below. Please provide your full name, postal address (if applicable) and email address so that we can find you on our mailing lists. Once we have the information we need, we will remove you from our mailing lists as you have requested. Please give us a reasonable amount of time to honor your request.

*Opt-Out Links.* We do not control how third parties use your information, but you can opt out of certain third-party activities at the links below.

To opt out of Google Analytics, please visit: <https://tools.google.com/dlpage/gaoptout>.

To opt out of certain ad functions, please visit: <https://youradchoices.com/control>.

*Do Not Track Mechanisms.* Because of the changing state of technology and indecision within the industry regarding the meaning of Do Not Track signals, we currently do not make any guarantee that we will honor Do Not Track signals.

## **EUROPEAN RESIDENTS**

*Note: The following section applies to residents of the European Economic Area only.*

*For the purposes of this section, Personal Information is equivalent to personal data, as it is defined in the EU's General Data Protection Regulation (Regulation (EU) 2016/679).*

### Processing in the United States

This Site is operated by the Foundation in the United States and any Personal Information submitted through the Site will result in the collection and processing of such information in the

United States. As a result, if you are visiting the Site from the European Economic Area (or any other country other than the United States), your Personal Information will cross an international boundary. The level of protection for your Personal Information in the United States may not be the same as the level of protection in your country.

### Lawfulness of Processing

We collect, use, and otherwise process your Personal Information based on the following:

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- *Based on your consent:* In some cases, at the point at which you provide Personal Information, we may ask you for your consent to collect and process your Personal Information. If you choose to provide us with your consent, you may later withdraw your consent (or opt-out) by contacting us as described below. Please note that if you withdraw your consent it will not affect any processing of Personal Information that has already occurred. Where we process your Personal Information based on consent, we may provide more detailed information to you at the time when we obtain your consent.
- *Compliance with applicable laws or performance of a contract:* In specific circumstances, we may need to process your Personal Information to comply with a relevant law/regulation or to fulfill our obligations under a contract to which you are subject. Where we process your Personal Information to meet our legal obligations, you will likely not be permitted to object to this processing activity, but you will usually have the right to access or review this information unless it would impede our legal obligations. Where we are processing your Personal Information to fulfill our obligations under a contract to which you are a party (e.g., to provide you with our products and services), you might not be able to object to this processing, or if you do choose to opt out or object to our processing, it may impact our ability to perform a contractual obligation that you are owed.
- *Our legitimate interest:* We may process your Personal Information based on our legitimate interests in communicating with you and managing our interactions with you regarding our products and Services, research, and educational opportunities. In addition to other rights you may have as described below, you have the right to object to such processing of your Personal Information. You can register your objection by contacting us as described below.

### Your Data Protection Rights

We comply with applicable data protection laws and value your right to privacy. In furtherance of our obligations to you that flow from our data collection practices, if you are resident in the European Economic Area you are entitled to the following rights:

- The right to access – You have the right to request copies of your Personal Information. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information

you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

- The right to erasure – You have the right to request that we erase your Personal Information, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your Personal Information, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your Personal Information, under certain conditions.

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- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- Right to submit complaints to Supervisory Authorities – You have the right to lodge a complaint with an applicable data protection authority. If you reside in Europe, you have the right to lodge such a complaint in the European country of your habitual residence, place of work, or place of an alleged infringement if you consider that the processing of your Personal Information infringes applicable EU data protection laws. A list of all European supervisory authorities and their respective contact information is available [here](#).

If you make a request, we will respond within one month of receiving your request. If you would like to exercise any of these rights, please contact us at [info@thefoundationunited.org](mailto:info@thefoundationunited.org).

## **CHILDREN'S PRIVACY**

Our Sites are not intended for individuals under the age of 13. Children under 13 years old may not use the Site or access its content without the written permission of a parent or guardian. If you believe that a child under the age of 13 has submitted information on or through one of our Sites without the consent and supervision of a parent or guardian, please contact us as indicated below.

## **CONTACT US**

If you have any questions regarding this Policy, please contact us via email at [info@thefoundationunited.org](mailto:info@thefoundationunited.org), or at the following address:

The Foundation United  
PO Box 5576  
Sarasota, FL 34277



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