



Personal Information Data Collections & Privacy Policies

“Personally Identifiable Information” (PII) is described as information that could be used on its own or with other information to identify, contact, or locate a single person. Give Something Back (Give Back) is committed to protecting the privacy of its clients. The following Privacy Policy (1) applies to you when you visit and use our Services, and (2) discloses how we collect, use, protect, or otherwise handle information and data we gather about you; and (3) sets out your options with respect to Give Back’s access to your information.

The Privacy Policy also applies to the following: (i) the giveback.ngo website (the “Site”) and other software tools used by Give Back to track and work with our clients, (ii) software, mobile applications, online services, network services, hardware or devices, or (iii) other products and services that specifically reference or link to this Privacy Policy (collectively, the “Services”), regardless of the means by which you access the Services, such as by your use of a computer, mobile device or other device(s). The Services do not include websites, mobile applications, devices, hardware, software, other products, or other services that reference, operate under, or link to another privacy policy.

What Information do we collect?

Information collected directly by Give Back

When you use our Services, communicate with us, or apply for our programs, we may request and collect certain information, including, but not limited to, (i) contact information, such as your first and last name, phone number, email address, physical address, city and state, postal code; (ii) demographic information, such as your age, gender, interests, education, profession, occupation, income level, marital status; and (iii) other information, such as applicable education information.

We will collect information through your use of the Services, including your conversations and interactions with staff, your attendance at events and your progress towards your stated goals.

When you access our Services by or through a device, including, without limitation, a mobile device, we may receive or collect and store information, including, without limitation, IP address, referring URLs, access times, browser type, device settings, unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google Ad

ID, or Windows Advertising ID), mobile carrier, device type and identifiers, model and manufacturer, device operating system brand and model, phone number, and, depending on your device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your device.

Information collected from Third Parties

In the course of providing our Services to you, we may collect information about you from third parties. For instance, information about you may be collected from interactions you have with the organization that referred you to our services.

How does Give Back use your information?

In addition to the uses made of the information stated above, we may use the information we collect from you in the following ways:

- To facilitate your access to and use of the Services.
- To provide, manage, and administer the Services.
- To improve our Site and Services in order to better serve you.
- To follow up with you after correspondence (live chat, email, or phone inquiries).
- To maintain internal recordkeeping and reporting.
- To detect and prevent unauthorized use of the Site or Services.
- To enforce our legal rights and satisfy our legal obligations, including without limitation any reporting or disclosure obligations under applicable law or regulations or subpoena, court order or other judicial or administrative process, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others.
- For any other purpose permitted under applicable law and regulation or agreed to in this Privacy Policy or disclosed at the time the information is collected.

How does Give Back Protect your information?

Give Back implements and maintains reasonable physical, technical, electronic, administrative and managerial procedures (security measures) to protect information transmitted to us online and collected and stored in our servers. Security safeguards may include but are not limited to secured networks, data encryption, firewalls, data use and access limitations/restrictions, confidentiality requirements, and physical access controls to our servers.

The Services are hosted on servers inside the United States and we may store and process (i.e., use and disclose) information throughout the United States, but due to the nature of cloud storage, information collected by Give Back about you, including personal information, could be transferred across borders to

other countries or jurisdictions around the world. By using our Services and providing information to us, you are advised and hereby consent to the transfer and processing of information, as described in this Privacy Policy, in facilities that may be located in the United States. You acknowledge this consent applies to you if you are located in the European Union or elsewhere outside the United States with laws governing data collection and use that may differ from U.S. law.

Of course, we cannot guarantee that your communications with the Site or Services will never be unlawfully intercepted or that your personal data will never be unlawfully accessed by third parties. Any transmission of information is at your own risk. Therefore, we urge you to always use caution when transmitting information over the Internet and remind you that you are responsible for ensuring the security of your information.

Third Party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information, without your consent, except to the extent described in this Privacy Policy. When your information is collected on the Services, it may be shared with selected third parties who assist us with our business operations, with the provision of the Services, with our marketing or advertising campaigns, or in delivering you additional services.

What are your options?

Access to and Modification of your Information

You may request and Give Back will provide you with a detailed listing of the information we have collected and stored. You may also request that we modify any of your PII information.

Cookie and Location Controls

Your browser, such as Internet Explorer, Chrome, Firefox and Safari, may allow you to manage or modify your cookies and local storage. Because each browser is a little different, we encourage you to check your browsers' "Help" feature to learn how to block cookies or other tracking/recording tools, how to receive notification of new cookies (warning you each time a cookie is being sent), and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all the Services and some parts of the Services may not function properly. For more information about how to manage your cookies, please refer to your browser's or mobile device's technical information. Please visit the external, third-party website: www.allaboutcookies.org for additional information on how to modify your cookie settings through your browser.

Third Party Behavioral Tracking

We do not support third-party behavioral tracking, except to the extent described in this Privacy Policy.

California's "Shine The Light" Law

If you are a California resident, California's "Shine The Light" law permits you to annually request and obtain information regarding disclosure made by Give Back of your personal information in the preceding calendar year. To make such a request, please send an email to admin@giveback.ngo.

Privacy Rights for California Minors in the Digital World

If you are a California resident under age 18 and are a registered user of the Site or any of the Services, then you may request that we remove any Submissions that you publicly posted on or in the Site or Services. To request removal of a Submission, please send a detailed description of the specific Submission to admin@giveback.ngo. We reserve the right to request that you provide information that will enable us to confirm that the Submission that you want removed was created and posted by you. We will make a good faith effort to delete or remove your Submission, but your Submission may remain on backup media, cached or otherwise retained by us for administrative or legal purposes or your Submission may remain publicly available if you or someone else has forwarded or reposted your Submission on another website or service prior to its deletion. We may be required by law to not remove or allow removal of your Submission.

COPPA (Children Online Privacy Protection Act).

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. We do not knowingly collect information from, allow registration by, send unsolicited promotions to, or specifically market to children under the age of 13 years old. The subject matter of the Site and Services is not directed to child-oriented activities and does not employ content that may be reasonably considered as appealing to children. If you become aware that we have collected personal data from a child without parental consent, please notify us promptly at admin@giveback.ngo. If we become aware that a child under age 13 has provided us with personal data without parental consent, we will take steps to remove such personal data.

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 your email address in order to (a) Send information, respond to inquiries, and/or other requests or questions; and (b) Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

We agree to the following: (a) Not to use deceptive, false or misleading header information, subject lines, or email addresses; (b) Identify the message as an advertisement in some reasonable way; (c) Include the physical address of our business or Site headquarters; (d) Monitor third-party email marketing services for compliance, if one is used; (e) Honor opt-out/unsubscribe requests in a commercially reasonable timeframe; and (f) Allow users to unsubscribe by requesting we remove them from our mailing list.

Changes to Privacy Policy

Give Back reserves the right to change our Privacy Policy at our sole discretion and encourages you to check this page periodically. If we decide to change our Privacy Policy, we will post those changes here whereupon they shall take immediate effect.

The latest version and effective date are published in the Revision History at the end of this document. Your continued use of the Site or Services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes made to it. LAST UPDATED: JULY 29, 2020

Additional Privacy Information for California Residents

This privacy notice for California residents supplements the information contained in the Privacy Policy of Above and Beyond—Business Tools and Services for Entrepreneurs, Inc. (“Beyond,” “we,” or “our”). Beyond adopts this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning used in this notice.

Information Give Back Collects

Give Back collects information that identifies, relates to, describes, references, is capable of being associated with, or could be reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples
A. Identifiers	Name, address, personal identifier, IP address, email address, account name, driver’s license number, passport number, or other similar identifiers
B. Personal information categories listed in the California Customer Records Statute	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport numbers, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other finance information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C. Protected classification under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information.)

Category	Examples
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health or exercise data.
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application or advertisement.
G. Geolocation data	Physical location or movements.
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or employment-related information	Current or past job history or performance evaluations.
J. Non-public education information (per the Family Education Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, including, but not limited to:

- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Your Rights and Choices

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing relationship with you, or otherwise perform our services with you.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy act.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at admin@giveback.ngo

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request with sufficient detail that allows us to properly understand, evaluate, and respond to it. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are a person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that personal information related to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Revision History

Date	Version	Revised By	Revision Summary
01/28/2023	2.00	Chad Carr & Jonathan Pugh	Adaption for Give Back for Beyond Policies
5/10/23//2023	2.1	Chad Carr	Approval by the Board