

## Privacy Policy

**Last Updated:** June 9, 2023

This Privacy Policy covers Gifts for Good, LLC ("Gifts for Good," "we," "us," "our") policies on the collection, use, and disclosure of personal information and data (as defined by applicable law, including, but not limited to, the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA") and the Virginia Consumer Data Protection Act of 2021, as amended, VA Code Title 59.1 a chapter numbered 52, consisting of sections numbered 59.1-571 through 59.1-581 ("VCDPA")) (collectively referred to as "Personal Information") when visitors and customers (collectively "Users") access, use, or otherwise interact with [www.giftsforgood.com](http://www.giftsforgood.com) (the "Site"), including personal information collected by the Gifts for Good® retail site and the GIFTforward® gifting software as a service (collectively the "Platform") and the software and services made available through the Platform (collectively the "Services").

Gifts for Good is a California corporation with offices in the United States. Gifts for Good collects Personal Information and processes, transfers and stores data within the United States. By optionally providing your Personal Information within the Platform, you consent to the collection, use and disclosure practices identified in this Privacy Policy. Users may withdraw your consent at any time by email at [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

[Section 8](#) is intended to provide the Notice of Collection required under the California Consumer Privacy Act.

### 1. Personal Information Collected by Gifts for Good

- **Account Information.** To purchase products through the Site, Users may optionally create an account, which will require customers to provide account-based information, including name, address, phone number, username and email. This information is necessary to facilitate account services and process purchase transactions. Gifts for Good will utilize email and/or cellular phone numbers provided to communicate with authorized users regarding purchases. Account information may also be used to (i) provide information regarding our Services; (ii) communicate material changes to our Terms of Service and Privacy Policy; and/or (iii) help us maintain and improve Services offered.
- **Order Information.** To process orders, Gifts for Good will require both payment and shipping information.
  - To make payments for the Services, Gifts for Good may collect debit or credit card account information, email and other information to verify the customer's identity, such as name, address, telephone number, and/or date of birth. Gifts for Good does not itself store debit or credit card information on its servers, but utilizes third party payment processors to manage and process payments in order to guarantee the security of personal payment information.
  - To facilitate shipping, Gifts for Good will collect the name, email and shipping address of the order recipient.
- **Email & Contact Information.** Users may optionally provide their email address and/or other contact information (e.g., name, company name, job title, email and

phone number ) to Gifts for Good to contact us through the Platform with questions about our products, Platform and/or Services, or to book a demonstration of our GIFTforward® services. Users may also optionally subscribe to our newsletters and may unsubscribe at any time through the opt-out link contained within those communications.

- **Partnership Applications.** Gifts for Good will receive first and last name, email, phone number when prospective partners complete a Cause Partner application through the Site.
- **Career Inquiries.** Gifts for Good will receive the name and email address, along with employment and educational background information, when a User emails their resume to Gifts for Good in response to Career postings on the Site. We use personal information received to evaluate applications for employment.
- **IP Address.** A user's "IP Address" is identified and logged automatically in our server log files whenever you visit the Platform, along with the time of the visit and the page(s) that were visited. Gifts for Good uses IP Addresses for calculating usage levels of the Platform, helping diagnose server problems, and administering the Platform and Services.
- **Web Beacons.** Pages of our Site and/or emails from Gifts for Good may contain small electronic files known as web beacons that permit Gifts for Good, for example, to count users who have visited those pages or opened an email and for other related Site statistics.
- **Cookies.** Gifts for Good's Site uses cookies to provide users with a better browsing experience -- cookies are only collected with your express consent. In addition, by accepting Gifts for Good's Privacy Policy upon purchase of the Services, you are consenting to Gifts for Good's use of cookies in connection with the Services itself. Gifts for Good utilizes cookie technology to gather information on Internet use in order to serve you more effectively. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. You can set your browser to remove or reject cookies; however some Platform features or Services may not work properly without cookies. Users can set their browser to remove or reject the following cookies utilized by the Site:
  - `_session_id`, unique token, sessional, Allows Shopify to store information about your session (referrer, landing page, etc).
  - `_shopify_visit`, no data held, Persistent for 30 minutes from the last visit, Used by our website provider's internal stats tracker to record the number of visits.
  - `_shopify_uniq`, no data held, expires midnight (relative to the visitor) of the next day, Counts the number of visits to a store by a single customer.
  - `cart`, unique token, persistent for 2 weeks, Stores information about the contents of your cart.
  - `_secure_session_id`, unique token, sessional, `_storefront_digest`, unique token, indefinite. If the shop has a password, this is used to determine if the current visitor has access.

**How You Can Control Advertising Cookies.** Cookies are also utilized to deliver advertising on our site. Among other uses, they allow us to show more relevant advertising to people who visit the site by showing you ads that are based on your

browsing patterns and the way you have interacted with our sites. You can find information about how to opt out of the cookies provided by our advertising partners here:

- **Google Ads.** Google Ads utilizes search engine marketing to serve ads to target audiences. Users can manage ad settings on [Google Advertising Opt-Out](#) and revisit their privacy preferences on Google's [Privacy Checkup](#) tool.
- **Meta Advertising.** Meta may use cookies, web beacons, and other storage technologies to collect or receive information and use that information to provide measurement services and target ads. Company may use "Visitor action pixels" from Meta on the Platform. This allows user behavior to be tracked after they have been redirected to the provider's website by clicking on a Meta ad. This enables us to measure the effectiveness of ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the Personal Information of individual users. Please see [Meta's Privacy Policy](#) for additional information. Users can opt-out of the collection and use of information for ad targeting. To opt-out, go to Privacy Settings through your Meta account and opt out under the Ad Preferences settings.
- **Pinterest.** Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network. Users may opt out of behavioral advertising features through their device settings, their Pinterest settings within your account or as otherwise described in the [Privacy Policy - Pinterest Policy](#).

Even if you opt out of cookies/ads personalization, you may still see ads based on factors such as your general location derived from your IP address, your browser type, and your search terms. You can also manage cookies for any online advertising service via the consumer choice tools created under self-regulation programs, such as the US-based [aboutads.info choices](#) page or the European Union ("EU")-based [Your Online Choices](#). See also the [Network Advertising Consumer Opt-Out](#).

## 2. Personal Information Received by Gifts for Good or Disclosed or Shared by Gifts for Good

Personal Information is collected to facilitate the Services offered, for marketing of our services and products, or for internal analysis relating to product improvements and data security. Gifts for Good shares Personal Information with only those contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Information confidential and to limit such use only for the purpose for which it is disclosed. Personal Information collected is processed by the following service providers to facilitate provision of the Services on the Platform or as otherwise disclosed at the time of collection to:

**Provide Services.** Personal Information is used to:

- Provide, operate and improve the Platform and Services;
- Order fulfillment and delivery;

- Process payments and complete transactions;
- Marketing communications about new products, services and promotions;
- Respond to inquiries and provide customer support and feedback;
- Detecting, preventing, and investigating security incidents that compromise the availability, authenticity, integrity or confidentiality of stored or transmitted personal information;
- Protecting against malicious, deceptive, fraudulent or illegal activity directed at Gifts for Good;
- Debugging to identify and repair errors that impair existing intended functionality;
- Analyze data to assess, understand and improve the services and personalize user experiences, including creation of anonymized aggregated, statistical and benchmark data. Aggregated data is utilized to help develop and market products or services and present targeted content and advertising;
- Enable functionality of the services to authenticate a user, prevent fraud, and implement security measures; and
- Undertaking activities to verify or maintain the quality of a service or product that is developed or provided, and to improve, upgrade, or enhance any service or product that is developed or provided by Gifts for Good.

**Share with Service Providers.** Gifts for Good has engaged with third party service providers to facilitate the Gifts for Good services and operate our business, including without limitation, vendors to facilitate order fulfillment and shipping, payment processors, data base management hosting, information technology, email/SMS delivery, customer support, analytics, data security and compliance services necessary to provide the Services. For each service provider, Gifts for Good will have in place written contracts that describes the purpose of the service and disclosure of Personal Information, and requires the service provider to both keep the Personal Information confidential and not use it for any purpose except performing the services pursuant to such contract.

**Analytics.** Gifts for Good uses the following third party analytics services:

- **Google Analytics:** Gifts for Good utilizes Google Analytics for data analytics to generate insights and recommendations. For more information please see Google's [Privacy Policy](#). However, if you do not want your Personal Information to be used by Google Analytics, you may opt-out by installing [Google Analytics Opt-out Browser Add-on](#).

**Compliance and Protection.** Personal Information may be disclosed to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if Gifts for Good is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law.

### **3. Personal Information of Minors**

Gifts for Good does not knowingly collect Personal Information from anyone under the age of 16. If we learn we have collected or received Personal Information from anyone under the age of 16 without verification of parental consent, we will delete that information. If a parent or guardian becomes aware that his or her child under the age of 16 has provided Gifts for Good with Personal Information without their consent, he or she should contact Gifts for Good at [hello@giftsforgood.com](mailto:hello@giftsforgood.com). Gifts for Good will delete such Personal Information from our files within a commercially reasonable time, but no later than required under the applicable law.

### **4. Retention and Deletion of Personal Information; De-Identified Data**

Unless erasure is otherwise requested under applicable law or as otherwise stated in this Privacy Policy, Gifts for Good will retain account data as long as it is necessary to provide services to our customers. Personal Information obtained from Platform visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as Gifts for Good determines such data is commercially necessary for its legitimate business interests.

To the extent Gifts for Good de-identifies any Personal Information, Gifts for Good shall maintain and use such de-identified data without attempting to re-identify the data.

### **5. Gifts for Good's Security Practices**

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration. However, although we endeavor to provide reasonable security for Personal Information we process and maintain, no security system can ever be 100% secure.

GFG utilizes only PCI-DSS compliant third party payment processors to ensure the security of your personal information. Credit/debit card information provided is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption.

### **6. Response To "Do Not Track" Signals**

"Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-website user tracking.

Gifts for Good shall treat any user-enabled [Global Privacy Control](#), such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicate or signal the consumer's choice to opt-out of the sale of their Personal Information as a valid request submitted pursuant to the CCPA for that browser or device, or, if known, for the consumer.

### **7. Changes to this Privacy Policy**

If we make material changes to our Privacy Policy, we will notify you by (i) changing the Effective Date at the top of the Privacy Policy, **or** (ii) sending an electronic notification to all active account holders, **or** (iii) adding a banner/notification to the Site itself.

## 8. Supplemental U.S. State-Specific Notices - Notice of Collection

This supplemental notice sets forth the disclosures and rights applicable to residents of California, Colorado, Virginia, Connecticut, and Utah. Such consumer privacy notices and rights shall also apply to other state residents to the extent other state consumer privacy laws are implemented following the last effective update to this Privacy Policy.

Gifts for Good collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed in Preceding 12 Months				
Category of Personal Information Collected	Categories of Source of Collection	Purpose of Use	Categories to Whom Gifts for Good Discloses Personal Information	Purpose of Disclosure
<b>Identifiers &amp; Personal Information</b>				
Name/Alias	User	Performing Services; Marketing; Security	Service Provider	Performing Services; Marketing; Security
Email	User	Performing Services; Marketing; Security	Service Provider	Performing Services; Marketing; Security
Address	User	Performing Services; Marketing; Security	Service Provider	Performing Services; Marketing; Security
Cell or Telephone #	User	Performing Services; Marketing; Security	Service Provider	Performing Services; Marketing; Security
Unique/Online ID (cookies)	Device	Analytics; Auditing; Data Security; Marketing	Service Provider	Performing Services; Data Security; Marketing
IP Address	Device	Debugging; Analytics	Service Provider	Performing Services; Data Security; Analytics
Account Name	Device	Performing Services; Data Security	N/A	N/A

Credit or Debit Card # / ACH	User *token only	Performing Services	Service Provider	Performing Services
- Browsing / search history - Interaction with site / advertisement	Device	Marketing; Analytics	Service Provider	Marketing; Analytics
<b>Professional/Employment-Related</b>				
Cell or Telephone #	User	Employment application evaluations	N/A	N/A

**Gifts for Good does not retain a consumer's Personal Information for longer than is reasonably necessary for each disclosed purpose.**

**Other Potential Disclosures:** Personal Information may also be disclosed to serve our legitimate business interests as follows: (a) as required by law, such as to comply with a subpoena, or similar legal process, (b) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (c) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (d) enforce our agreements with you, and/or (e) investigate and defend ourselves against any third-party claims or allegations.

### **1. Sale of Personal Information; Sharing of Personal Information; Right to Opt-Out**

Gifts for Good does not and will not sell your Personal Information. However, under the CCPA, some sharing of personal information necessary to provide you with personalized ads may be considered a "sale," even if no money is exchanged.

Gifts for Good does not share Personal Information with third parties for cross-context behavioral advertising purposes.

To the extent Gifts for Good is regarded as "selling" your personal information (as the term "sell" is defined under the CCPA), you have the right to opt-out of that "sale" on a going-forward basis at any time. Certain state residents have a right to opt-out from the "sale" or "sharing" of your personal information with third parties who are not our service providers (as those terms are defined by applicable laws) and/or to opt out of cross-context behavioral advertising. To exercise this right, click the "Do Not Sell or Share My Personal Information" link on the bottom of the Platform page where your information is being collected or go to your account settings. You can also submit a request to opt-out by emailing us at [hello@giftsforgood.com](mailto:hello@giftsforgood.com) with the subject line "Do Not Sell or Share." Finally, if your browser supports it, you can turn on the [Global Privacy Control](#) to opt-out of the "sale" or "sharing" of your personal information.

## 2. Collection of Sensitive Information.

Gifts for Good does not collect Sensitive Information.

## 3. Consumer Rights Consumers may contact Gifts for Good to exercise the following consumer rights:

### 1. Request Gifts for Good Disclose At No Charge ("Right to Know"):

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared.

Right to Know Requests can be submitted to Gifts for Good by email at [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

### 2. Request Gifts for Good to Delete At No Charge ("Right to Delete"):

Deletion Requests can be submitted to Gifts for Good by email at [hello@giftsforgood.com](mailto:hello@giftsforgood.com) or by mail to Gifts for Good at: **Gifts for Good, Inc., Attention: Privacy Request to Delete, 520 S. Sepulveda Blvd. #300, Los Angeles, CA 90049** or by email at: [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

### 4. Request Gifts for Good Correct At No Charge ("Right to Correct"):

Requests that Gifts for Good correct any inaccurate Personal Information collected by Gifts for Good can be submitted by email to [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

## 5. Verified Request Process

Gifts for Good will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with Gifts for Good, it may verify the identity of the consumer making the request by either matching information with the account information on file or through existing account authentication credentials.

Under applicable state law, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Gifts for Good may additionally require the consumer to confirm their identity and verify the authorized agent's permission before complying with any request.

## 6. Consumer Request Limitations



Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state laws, including, but not limited to:

- Gifts for Good is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required if it is necessary for Gifts for Good to maintain the Personal Information to fulfill applicable permissible purposes enumerated pursuant to applicable state consumer privacy laws.

Gifts for Good will confirm and respond to all requests within the timeframe required under applicable state law. In responding to any request to disclose/delete, Gifts for Good shall maintain a record of the requests as required under applicable state law.

#### **7. Non-Discrimination Policy**

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA and VCDPA. Gifts for Good shall not discriminate against a consumer for exercising any statutory consumer privacy rights, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Gifts for Good for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services, or (d) providing a different level of quality of goods/ services.

Employees, applicants and independent contractors have the right not to be retaliated against for the exercise of their CCPA rights.

#### **8. Your Virginia Privacy Rights under VCDPA**

If Gifts for Good is unable to process requests relating to your Personal Information and denies your request, Virginia residents have the right to appeal by emailing Gifts for Good at [hello@giftsforgood.com](mailto:hello@giftsforgood.com). Gifts for Good will respond to your appeal request within 60 days of receiving the request to appeal.

#### **9. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581**

California law permits Consumers to request and obtain from Gifts for Good once a year, free of charge, certain information about their Personally Identifiable Information ("PII") (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

10. **Accessibility of this Policy.**

- You can download and print a copy of this Notice [here](#).

11. **Contact Us**

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Gifts for Good, Inc., Attention: Privacy Department, 520 S. Sepulveda Blvd. #300, Los Angeles, CA 90049** or by email at: [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

9. **Applicable EU GDPR Notices**

**Data Processor.** Gifts for Good is the processor of all Customer Data (as defined in the applicable Terms of Service), including Personal Information input by a Customer, and its Authorized Users, in connection with a Customer's use of the Gifts for Good Services. Gifts for Good's Data Protection Offer can be reached at **Gifts for Good, Attention: Privacy Department, 520 S. Sepulveda Blvd. #300, Los Angeles, CA 90049**. You may contact us at any time through by emailing us at [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

For applicable EU Users, we will only collect and process Personal Information about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you, and "legitimate interests." Where we rely on your consent to process Personal Information, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your Personal Information, please submit a request through email to Gifts for Good at [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

## **How to Review, Transfer, Restrict the Use of or Request Erasure of Personal Information**

### **IF YOU WOULD LIKE TO:**

- Access, review, restrict processing of, or otherwise request erasure of your Personal Information;
- Obtain the identity of the source of any Personal Information collected;
- Request correction of any errors contained within your Personal Information;
- Request Gifts for Good transfer your Personal Information to another service provider;
- Object to the manner in which your Personal Information is processed;
- Lodge a complaint with an EU supervisory authority; or
- Withdraw consent to the collection of your Personal Information

**Requests under this Section can be made through** email at [hello@giftsforgood.com](mailto:hello@giftsforgood.com). We will respond in the timeframes required under applicable law. For all requests made pursuant to this section, Gifts for Good will (a) respond as required under applicable law, (b) provide a copy of any requested Personal Information in a structured, commonly used and machine-readable format, and/or (c) transmit such Personal Information to another service provider without restriction in accordance with applicable law.

### **10. Contact Us**

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Gifts for Good, Inc., Attention: Privacy Department, 520 S. Sepulveda Blvd. #300, Los Angeles, CA 90049** or by email at: [hello@giftsforgood.com](mailto:hello@giftsforgood.com).

*This Privacy Policy was last updated on June 9, 2023*