

PRIVACY POLICY

Anondo Fund, Inc.

Last updated January 12, 2022

Thank you for visiting Anondo Fund, INC, doing business as AnonDo Fund ("AnonDo Fund," "we," "us," or "our"). We are deeply committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at anondofund@gmail.com.

This privacy notice describes how we might use your information if you:

- Visit our website at anondo.org
- Engage with us in other related ways — including any donations, sales, marketing, or events

In this privacy notice, if we refer to:

- "Website," we are referring to any website of ours that references or links to this policy
- "Services," we are referring to our Website, and other related services, including any donations, sales, marketing, or events

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.

Quick Summary: *We want to help you be as private online as we can, as the anonymity of all donors is a deeply-held, central value in our organization. We do not sell or give away **any** personal information of donors – we only use your information with your consent, to comply with laws, to provide you with our services, to protect your rights, or to fulfill business obligations. The only instances we use web-analytics tools is to help us refine our website and value proposition to our donors (all of you!).*

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

Quick Summary: *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our services, when you participate in activities on the Website or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the features you use. The personal information we collect may include the following:

Personal Information Provided by You. We collect names; email addresses; billing addresses; and our payment partners collect debit/credit card numbers; banking information; and other similar information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Stripe and Plaid. You may find their privacy notice link(s) here: <https://stripe.com/privacy> and <https://plaid.com/legal/>.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Quick Summary: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.*

We automatically collect certain information when you visit, use or navigate the Website. This information does **not** reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed,

searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

- Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device.

2. HOW DO WE USE YOUR INFORMATION?

Quick Summary: *We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent. We will Never give your confidential information to outside sources.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- Fulfill and manage your donations. We may use your information to fulfill and manage your donations, payments, or refunds made through the Website.
- To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

Quick Summary: *We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***Quick Summary:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

***Quick Summary:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 7 years (which is currently the mandate for US 501(c)(3) organizations).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it offline from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

***Quick Summary:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process, including the systematic deletion of your personal information off of our backend servers to store in an encrypted vault after at least 30 days (but likely within 7 days). However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

***Quick Summary:** In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <https://ec.europa.eu/newsroom/article29/items/612080>

If you are a resident in Switzerland, the contact details for the data protection authorities are available <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit <http://www.aboutads.info/choices/>.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for

recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Quick Summary: *Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website, you have the right to request removal of unwanted data that you publicly post on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category

A. Identifiers

Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name

Collected: YES

B. Personal information categories listed in the California Customer Records statute
Name, contact information, education, employment, employment history and financial information

Collected: YES

C. Protected classification characteristics under California or federal law
Gender and date of birth

Collected: NO

D. Commercial information
Transaction information, purchase history, financial details and payment information

Collected: NO

E. Biometric information
Fingerprints and voiceprints

Collected: NO

F. Internet or other similar network activity
Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements

Collected: NO

G. Geolocation data
Device location

Collected: YES

H. Audio, electronic, visual, thermal, olfactory, or similar information
Images and audio, video or call recordings created in connection with our business activities

Collected: NO

I. Professional or employment-related information
Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us

Collected: NO

J. Education Information
Student records and directory information

Collected: NO

K. Inferences drawn from other personal information

Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics

Collected: NO

We may also collect other personal information outside of these categories instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at anondofund@gmail.com, or by referring to the contact details at the bottom of this document.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each payment provider. Each provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own internal-only business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

Anondo Fund, INC has not disclosed or sold any personal information to third parties for a business or commercial purpose. Anondo Fund, INC will not sell personal information in the future belonging to website visitors, users and other consumers.

Your rights with respect to your personal data

Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect (ie the fields on our donation forms);

- the purposes for which the collected personal information is used;
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights. We want to help you be as private online as you can.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- you may object to the processing of your personal data.
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data.
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

To exercise these rights, you can contact us by email at anondofund@gmail.com. If you have a complaint about how we handle your data, we would like to hear from you.

11. DO WE MAKE UPDATES TO THIS NOTICE?

Quick Summary: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such

changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at anondofund@gmail.com or by post to:

Anondo Fund, INC
2027 W Division Street
Suite 118
Chicago, IL 60622
United States