



POLICY and PROCEDURE

DEPARTMENT: Information Technology SECTION:	NUMBER:	RCIT-1045
TITLE: ReliefCompass Privacy Policy	ORIGINATED:	9/4/2022
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APPROVALS		
Owner: CEO	Signature:	
Approved by: CEO	Approved by:	Approved by:
Date:	Date:	Date:

Signed Policy can be provided on request to reliefcompass@reliefcompass.com

Relief Compass is committed to respecting the privacy rights of its customers, visitors, and other users of the www.ReliefCompass.com website, the ReliefCompass mobile application, as well as any other media form, media channel or mobile application related, linked, or otherwise connected thereto (collectively, the “Sites”), and any material and services made available through the use of the Sites (the foregoing, including the Sites, collectively referred to as the “Services”). We understand that the information you share is private to You and we are committed to respecting the privacy and security of your personal information. Please read this Privacy Policy to understand how We use and look after the personal information that You provide to Us.

We created this Privacy Policy to give you confidence as you visit and use the Services, and to demonstrate Our commitment to fair information practices and the protection of privacy. This Privacy Policy is only applicable to the Sites and Services, and not to any other websites that You may be able to access from the Sites or Services, each of which may have data collection, storage, and use practices and policies that materially differ from this Privacy Policy.

All references in this Privacy Policy to the “website” or “Website” refer to the Sites; references to “We”, “Us”, “Our” and “RELIEF COMPASS” refer to RELIEF COMPASS; and references to “You” and “Your” are to you, the user.

The purpose of the Sites and Services is to provide a centralized holistic platform for disaster relief, recovery, and preparation purposes, allowing for individuals to request needs and offer donations (including, but not limited to “Donors,” which are natural person(s) or non-Provider Organization entity(ies), whose primary purpose for using or accessing the Site or Services is to offer donations, resources, or help to Requesters, in connection with an emergency or disaster,

and/or “Provider Organizations,” which are organizations or programs that provide community, social, or other services, including but not limited to local businesses, food banks, government benefit programs or agencies, non-profit organizations and community-based organizations; “Requesters” are natural person(s) or someone on their behalf, whose primary purpose for using or accessing the Site or Services is to request needs, resources, or help from Donors or Provider Organizations, in connection with an emergency or disaster), and connecting such individuals with Provider Organizations. Through the Sites and Services, RELIEF COMPASS will generate request and donation orders for a team of dispatchers (on behalf of Provider Organizations, or, in some cases, on behalf of RELIEF COMPASS), and those orders will be fulfilled by delivery drivers, warehouse workers, and other individuals as necessary, using a Points of Distribution (POD) system, whereby centralized POD locations are used to deliver and pick up life-sustaining commodities, such as shelf-stable food and water, following a disaster or emergency. We reserve the right to add or discontinue any function, service, or feature of the Sites or Services at any time, or to integrate services or features provided by third parties.

We use your Personal data to provide and improve the Sites and Services. By using the Sites or Services, you agree to the collection and use of information in accordance with this Privacy Policy. If You are not satisfied with any aspect of this Privacy Policy, discontinue using the Sites and Services immediately.

TYPES OF DATA COLLECTED

Personal Data

In order to provide the Sites and Services, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You including but not limited to the following categories:

- Identifiers, such as your first and last name, address, Internet Protocol address, and other similar identifiers.
- Contact information, such as:
 - Email address
 - First name and last name
 - Phone number
 - Address, State, Province, ZIP/Postal code, City
 - Address, State, Province, ZIP/Postal code, City from which You or other individuals are displaced.
- Program specific eligibility criteria for disaster relief, economic relief, or other programs providing resources. (IE demographic, household, PII, regional)
- Internet or other electronic network activity information, such as session logs.
- Geolocation data, such as the physical location of your recorded activity.
- Browser cookies.

Much of the above information, including the program specific eligibility information listed, is required by the third-party program, agency, or organization providing the resources/relief You are requesting through the Sites or Services. If You do not want to provide this information through the Sites or Services, you are free to contact the specific third-party program, agency, or organization to determine if there is an alternative application process.

You may also provide the above information in order to edit, update or correct the information under Your account, directly on the Sites or Services by You, or by contacting Us to update or correct the information under Your account.

Usage Data

Usage Data is collected automatically when using the Sites or Services.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of Our Sites or Services that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Sites or Services by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Our Sites or Services or when You access the Sites or Services by or through a mobile device.

Cookies/Tracking Technologies/Universal Identifiers/Fingerprinting

Cookies are text files placed on your computer or device to collect standard Internet log information and visitor behavior information. When You visit the Sites or Services, We may collect information from you automatically through cookies or similar technology. For further information about cookies, visit [all aboutcookies.org](http://allaboutcookies.org).

Like many websites, Our Sites and Services employ cookies, JavaScript tags and Web beacons (also known as a clear GIF technology or "action tags") to speed your navigation of the Sites and Services, recognize You and Your access privileges, and track usage of Our Sites and Services.

We use both persistent cookies and third-party cookies. Persistent and third-party cookies enable Us to track and target the interests of users of Our Sites and Services to enhance Your experience on the Sites and Services. Persistent cookies are used to make it easier for You to navigate the Sites and Services, and remain on Your hard drive for an extended period of time. Third-party cookies are only used for short-term tracking.

Most Internet browsers are initially set up to accept cookies. You may download an opt-out cookie to disable any and all cookies We employ to track and enhance Your user experience – however, your ability to use the Sites and Services will then be limited and/or unavailable. As different computers and Internet browsers all require their own version of the opt-out cookie, you must perform this opt-out process on all computers and browsers that You wish to be opted-out.

Third Party Analytics

We may also use automated devices and applications, or other analytic means to evaluate the Sites and Services. We use these tools to help us improve the Sites and Services, performance, and user experiences. The entities that provide these tools may use cookies and other tracking technologies to perform their services. However, we do not share Your Personal Data with these third parties. We do not have access to or control over these third-party cookies nor does this Privacy Policy cover such third parties' use of data. Furthermore, RELIEF COMPASS offers functionality that allows certain third-party organizations with their own Sites integration to use automated devices and applications, such as Google Analytics, and other analytic means to evaluate the Sites and Services. For additional information about such third-party organizations' use of third party analytics, please visit and review such third party organizations' privacy policies. You may be able to opt-out or restrict the collection or use of information by some commonly used tracking services by contacting such third-party services directly.

USE OF YOUR PERSONAL DATA

We may use Your Personal Data for the following purposes:

- **To provide and maintain Our Sites and Services**, including for monitoring the usage of Our Sites and Services, for troubleshooting and technical support purposes in connection with the Sites and Services, improving the Sites and Services, and better understanding how users access and use the Sites and Services;
- **To connect You with individuals and organizations**, including individuals requesting needs, such as Requesters, or offering donations, such as Donors, in connections with disasters, and programs or organizations, such as Provider Organizations, that offer community, social, or other services, including but not limited to local businesses, food banks, government benefit programs and agencies, and non-profit organizations and community-based organizations;
- **To help You apply for resources or benefits You have requested**, including making such requests to the third-party individuals and entities identified in the above bullet point;
- **To manage Your Account and Your registration**, as a user of the Sites or Services. The Personal Data You provide can give You access to different functionalities of the Sites or Services that are available to You as a registered user;

- **To contact You** by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications, regarding updates or informative communications related to the functionalities, products or contracted services, including security updates, when necessary or reasonable for their implementation. See the "Text Messaging / SMS Program" section below for details specific to SMS communications;
- **To provide You** with news, special offers and general information about other goods, services and events which We offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information;
- **To manage Your requests to Us.**

TEXT MESSAGING / SMS PROGRAM

- **If You** opt in to receive text messages from RELIEF COMPASS, We collect Your mobile phone number and the date, time, and content of your consent, along with any information You provide in the course of the messaging program (collectively, "Messaging Data"). We use Messaging Data to send You messages related to disaster relief requests, donation coordination, service updates, and, where You have separately consented, informational or promotional messages.
- **Message frequency varies depending on** Your activity and the programs You participate in. Message and data rates may apply. You may opt out of receiving text messages at any time by replying STOP to any message You receive from Us. You may request help by replying HELP. After You reply STOP, We will send You a one-time confirmation message, and You will receive no further messages from Us unless You opt in again.
- **No mobile information**, including phone numbers and consent records, will be shared with third parties or affiliates for marketing or promotional purposes. This restriction applies regardless of any other data-sharing provision in this Privacy Policy. Categories of third parties described elsewhere in this Privacy Policy (e.g., Provider Organizations, vendors) may still receive Messaging Data where necessary to fulfill a request You have made, but not for their own marketing or promotional use.

RETENTION OF YOUR PERSONAL DATA

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if We are required to retain your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

TRANSFER OF YOUR PERSONAL DATA

Your information, including Personal Data, is processed at Our central system and in any other places where the parties involved in the processing are located including community dispatch entities. It means that this information may be transferred to – and maintained on – computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

DISCLOSURE OF YOUR PERSONAL DATA

We share Your Personal Data at Your direction, and except for the limited exceptions discussed below, We do not share Your Personal Data with third parties unless You agree in advance. We will not share Your Personal Data with any third parties for their direct marketing purposes unless You are first notified.

Notwithstanding anything else in this section, mobile information and messaging consent obtained through Our SMS program are not shared with third parties or affiliates for marketing or promotional purposes.

Third parties that provide donations, resources, benefits

As mentioned, We primarily share Your Personal Data with third parties that provide donations, resources, and/or benefits, such as Provider Organizations, that You request and would like to receive (or in the case of Donors, that You would like to coordinate the giving of Your donation and/or resource). Specifically, at Your direction, We will submit Your Personal Data and/or application, as applicable, to the appropriate third parties. The third party, not RELIEF COMPASS, will evaluate Your eligibility to obtain donations, resources, benefits, and/or similar goods or services that the third party provides. The third party's use of Your Personal Data will be the sole responsibility of the third party and be governed by the third party's privacy policy, as applicable. RELIEF COMPASS does not have any control over Your Personal Data once it is submitted to a

third party for receipt of the goods or service mentioned in this section. For example, if You are interested in first aid services, then We will share Your Personal Data, at Your direction, with organizations that provide first aid services. In some instances, Your Personal Data may be shared with third-parties who are providing grants, financial assistance, or other support for the programs You are applying for. If You are a Donor, Your Personal Data will be provided to Provider Organizations in order for such Provider Organizations to coordinate with You how and where to deliver Your donations, resources, and/or help.

In sharing Your Personal Data with third parties, as stated in this section, such information will be provided to each and every third party that You request. By consenting to this sharing, You further agree that the third parties themselves may also collaborate and share Your Personal Data solely in support of the goods or services You are seeking (either to receive, as a Requester, or to provide, as a Donor). To the extent that any other information is generated from the collaboration and such information is stored in the Sites or Services, such information will be deemed to be covered by this Privacy Policy. **ALTHOUGH WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES AT YOUR DIRECTION, WE ARE NOT RESPONSIBLE FOR THE ACTS AND OMISSIONS OF THIRD PARTIES.**

Vendors who provide Us with services

We may hire vendors to provide limited services on Our behalf, such as website hosting, payment processing, sending postal and e-mail, providing technical support, and to assist Us in providing the products and services that You request through the Sites and Services. We only provide these service providers with the information necessary to perform the requested service.

Business transactions

If We are involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, We may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

We may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation

- Protect and defend the rights or property of RELIEF COMPASS
- Prevent or investigate possible wrongdoing in connection with the Sites or Services
- Protect the personal safety of users of the Sites or Services or the public
- Protect against legal liability

REVIEWING AND UPDATING/CORRECTING YOUR PERSONAL DATA

We maintain a procedure in order to help you confirm that your Personal Data remains correct and up to date. At any time during an event or existing event, you will be required to verify your phone number, and this will act as your identifier. Once an event is completed the data is removed and archived off to the organization that established the event. Each new event will require a new verification to ensure the contact is accurate along with any additional information collected. You may e-mail Us at ReliefCompass@ReliefCompass.com for questions around any personal data captured.

SECURITY OF YOUR PERSONAL DATA

The security of Your Personal Data is important to Us and We use industry-standard techniques to protect the information that You provide to Us through the Sites and Services. You should remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to protect Your Personal Data to the best of Our abilities, We cannot guarantee its absolute security.

CHILDREN'S PRIVACY

Our Sites and Services are not directed to children under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. We have no way of distinguishing the age of individuals who access our Sites or Services. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionality of the Sites and Services to these users.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

CALIFORNIA RESIDENTS

Under California's "Shine the Light" law, California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from Us, once each calendar year, information about the customer information We shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which We shared customer information for the immediately preceding calendar year.

To obtain this information, please send an e-mail message to ReliefCompass@ReliefCompass.com with "Request for California Privacy Information" in the subject line and in the body of Your message. We will provide in response the requested information to You at Your e-mail address.

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only required information will be included in Our response.

ANTI-SPAM

We comply with anti-Spam laws, including the Controlling the Assault of Non-Solicited Pornography And Marketing Act of 2003 (CAN-SPAM Act). If You opt-in to receive marketing, direct marketing, or other communications, the option to unsubscribe will be included in every email. If We sell or transfer any of Our business or assets, certain information about Our users may be part of that sale or transfer. In the event that such sale or transfer results in a material change to this Privacy Policy, We will notify You.

DO NOT TRACK (DNT)

Some browsers allow You to automatically notify websites You visit not to track You using a "Do Not Track" (DNT) signal. There is no consensus among industry participants as to what DNT means in this context. Like many websites and online services, we currently do not alter Our practices when we receive a DNT signal from a visitor's browser. To find out more about DNT, you may wish to visit www.allaboutdnt.com.

LINKS TO OTHER WEBSITES

Our Sites and Services may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. Our Privacy Policy applies only to our Sites and Services, so We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHANGES TO THIS PRIVACY POLICY

We keep Our Privacy Policy under regular review and may update our Privacy Policy from time to time. We may change this Privacy Policy at any time without prior notice to You. Any changes that we make will be effective immediately upon our posting of the revised Privacy Policy on this page. Your continued use of the Sites or Services constitutes your consent to any changes made.

We will alert You about any changes by updating the “Last updated” date at the top of this Privacy Policy, and You waive any right to receive specific notice of each such change. Any changes will be effective immediately upon posting the revised version (or such later effective date as may be indicated by the “Last updated” date at the top of the revised Privacy Policy). However, We have no obligation to update any information on the Sites or Services.

You are advised to review this Privacy Policy periodically for the latest information on Our privacy practices.

CONTACT US

If You have any questions about this Privacy Policy or would like a copy of the approved version, You can contact Us:

- By email: ReliefCompass@ReliefCompass.com