

## **PRIVACY POLICY**

This Privacy Policy was last updated on January 23, 2020.

This Privacy Policy applies to the website [www.givevia.com](http://www.givevia.com) owned and operated by Reward Mark, LLC (the “**Privacy Policy**”). We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint. This Website is offered and available to users who are 18 years of age or older and reside in the United States or any of its territories or possessions. By using this Website, you represent and warrant that you meet all of the foregoing eligibility requirements.

When you use the Website, you consent to our collection, use, disclosure, and retention of your information as described in this Privacy Policy. Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it.

**BY ACCESSING OR USING THE WEBSITE, YOU AGREE TO THIS POLICY. IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT USE THIS WEBSITE AND ITS SERVICES.**

The Effective Date of this Privacy Policy is provided at the top of this page. This policy may change from time to time (see below: Changes to This Privacy Policy). We will not make retroactive changes that reduce your privacy rights unless legally required to do so. Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

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**1. Key Terms.** It would be helpful to start by explaining some key terms used in this policy:

We, us, our, Reward Mark	Reward Mark, LLC
Personal information	Any information relating to an identified or identifiable individual
Website	<a href="http://www.givevia.com">www.givevia.com</a>

**2. Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers)	<ul style="list-style-type: none"> <li>• Real first and last name</li> <li>• Email address</li> </ul>
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement)	<ul style="list-style-type: none"> <li>• Name of nonprofit(s) selected for donations</li> <li>• Cookies and other technologies to better understand user behavior, personalize preferences and services provided.</li> </ul>

Our Website uses Cookies such as HTTP cookies, HTML5 Cookies and other types of local storage (such as browser-based or plugin-based storage). If you disable Cookies on your website, you may not be able to generate donations for your charity.

This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing our services to you. We may collect and store information that you provide us about other people. By submitting information about someone other than yourself, you represent that you are authorized to provide us with that person’s information for the purpose identified in this Privacy Policy or in connection with the Website.

**3. How Your Personal Information is Collected.** We collect most of this personal information directly from you—in person, by telephone, text, email and our Website. However, we may also collect information:

- From a third party with your consent (e.g., your bank);

- From cookies on our Website; and
- Via our IT systems.

**4. How and Why We Use Your Personal Information.** Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for:</b>	<b>Our reasons:</b>
To provide services to you, including providing you with information or services that you request from us, responding to your inquiries or other correspondence, fulfilling another purpose for which you provide personal information, notifying you about changes to our Website or any offered services, and any other purpose with your consent	For the performance of our contract with you or to take steps at your request before entering into a contract  To benefit a third party at your request  For our legitimate interests or those of a third party
To present our Website and its contents to you	For our legitimate interests or those of a third party, i.e. promote and share our business to you
To administer, review, and improve the content of our Website and services	For our legitimate interests or those of a third party, i.e. to be make sure that our Website is accessible and efficient
To prevent and detect fraud against you or a nonprofit who receives donations from us	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you

Preventing unauthorized access and modifications to systems	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
Updating customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>— existing and former customers;</li> <li>— third parties who have previously expressed an interest in our services;</li> <li>— third parties with whom we have had no previous dealings.</li> </ul>	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>

**5. Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above: “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it with other organizations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by using the “unsubscribe” link in emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

**6. Who We Share Your Personal Information With.** We do not sell, trade, or rent your personal information to others. However, we may share generic aggregated information

about our users, and information that does not identify any individual, without restriction. We routinely share personal information with:

- Other third parties we use to help us run our business, such as marketing agencies or website hosts
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers; and
- Nonprofit organizations you have added to your impact list if you have elected to receive email updates.

We only share your name and email address as the source of specific donations to nonprofits on your impact list provided that you elected to receive email updates; you may change your disclosure selection at any time in your account with Givevia.

We may allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. If another company acquires Reward Mark LLC or the Givevia Site, that company will take on all responsibility for the information we collect and it will assume all rights and obligations with respect to that information. Should this happen, the acquiring company may implement its own policies with respect to your information.

We will not share your personal information with any other third party without your consent.

**7. Where Your Personal Information is Held.** Information may be held at our offices and those of our service providers, representatives and agents as described above (see: “Who We Share Your Personal Information With”).

**8. How Long Your Personal Information Will Be Kept.** We will keep your personal information while you have an account with us or while we are providing services to or for you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

**9. Transferring Personal Information from the EU to the US.** Reward Mark LLC is headquartered in the United States. Information you provide to us or we collect from you will be processed in the United States. The United States is not currently considered by the EU to provide an adequate level of data protection. Reward Mark therefore relies on exceptions listed in the General Data Protection Regulation (“GDPR”). In particular, we collect and transfer your personal information to the United States only: with your consent; to perform services under the contracts we have in place with you; or to fulfill compelling legitimate interest of Reward Mark that does not outweigh your rights or freedoms. Reward Mark strives to apply suitable safeguards to protect the privacy and security of your personal information and to use it only as described in this Policy. For more information regarding the GDPR and data transfers, click [here](#).

**10. Your Rights with Respect to Your Personal Information.** Depending on the location from where you access the Website, you may have the right to access, correct, delete, or restrict use of certain personal information covered by this Policy and exercise all other rights set forth in Articles 15-22 of the GDPR. You may also have the right to request that we refrain from processing your personal information. Please bear in mind that if you exercise such rights this may affect our ability to provide our services. For inquiries about your personal information, please contact us. Although we will make reasonable efforts to accommodate your request, we reserve the right to impose certain restrictions and requirements on such requests, if allowed or required by applicable laws. Please note that it may take some time to process your request.

**11. Keeping Your Personal Information Secure.** We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password to certain parts of our Website, you are responsible for keeping this password confidential. Do not share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for the unauthorized acts of others (including hacking, i.e., the circumvention of any privacy settings or security measures contained on the Website) and we assume no liability for any disclosure of information due to errors in transmission, unauthorized third-party access, or other acts or omissions beyond our reasonable control.

**12. Links to Third Party Websites.** Our Website may contain links to other websites. If you click on a third-party link, you will be directed to that website. Note that these external links are not operated by us. This Privacy Policy does not apply when you access third party websites. We cannot control how third parties may use personal information you disclose to

them, so you should carefully review the privacy policy of any third-party website you visit before using it or disclosing personal information to its provider.

**13. Children’s Privacy.** The Website and its services are offered and available only if you are 18 years or older. Reward Mark does not knowingly collect or store any personal information from children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe we might have any information from or about a child under 13, you may submit a request for removal at [Help@Givevia.com](mailto:Help@Givevia.com).

**14. How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, please email us at [Legal@Givevia.com](mailto:Legal@Givevia.com).

If you choose to contact us directly via the website or email, you will need to provide us with:

- Enough information to identify you (e.g., your full name and email address); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person’s behalf.

Any personal information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

**15. Changes to This Privacy Policy.** This Privacy Policy was last updated on the date shown on the first page.

We may change this privacy notice from time to time. You are expected to check this Privacy Policy frequently so you are aware of any changes, as they are binding on you.

**16. How to Contact Us.** Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you. If you no longer wish to receive any promotional or other communications from us, you may unsubscribe by following the instructions included in each email communication or contacting us at the details listed below.

Our contact details are shown below:

Reward Mark, LLC
PO Box 51, Powell OH 43065
LetsTalk@Givevia.com
800-725-9211