

ADDENDUM FOR CALIFORNIA RESIDENTS CALIFORNIA PRIVACY RIGHTS

Last Modified: May 29, 2020

NOTICE TO CALIFORNIA RESIDENTS [CONSUMERS] – CALIFORNIA CONSUMER PRIVACY PROTECTION ACT

The California Consumer Privacy Act of 2018 (“CCPA”) provides certain rights to residents of California. This section of the Privacy Policy applies if you are a natural person who is a resident of California (“California Consumer”) and uses our Services. This Addendum supplements the information in the Privacy Policy. However, this Addendum is intended solely for, and is applicable only as to, California Consumers: if you are not a California Consumer (or a resident of California), this does not apply to you and you should not rely on it.

In the below tables and sections, we describe (as required by the CCPA):

1. **Our Collection of Personal Information** – the types of Personal Information (which the CCPA defines broadly) that we collect, the types of sources we collect it from,
2. **Our Disclosure and Sale of Personal Information** – the types of recipients to whom we disclose or sell Personal Information.
3. **Our Business Purposes** – our business purposes for (a) collecting and (b) sharing Personal Information, which are generally the same.
4. **Your California Privacy Rights and Choices** – what rights you have under the CCPA, for instance, to request that we “opt out” your information from our marketing database (also called “do not sell” rights), or to request categories and personal information that we may have collected about you.

The following sets forth the categories of information we collect and purposes for which we may use California Consumers’ personal information:

1. OUR COLLECTION OF PERSONAL INFORMATION

Depending on how you interact with us, we may collect about you the categories of information summarized in the table below. The following table also describes how we collect and use such categories of information.

Category

Sources

Identifiers, e.g., name; alias; postal address; email address; telephone numbers

Our clients, including consumer publishers, consumer merchandisers and nonprofits, occasionally supplemented or validated and verified by information from data compilers and resellers.

Characteristics of protected classifications under California or US law

E.g., race; color; religion; sex/gender; marital status; military or veteran status; national origin; ancestry; age (over 40) [which may be self-reported or inferred].

Data compilers.

Internet or other electronic network activity information

E.g., information about categories of consumer interests derived from online usage (such as the fact that someone tends to make donations online); information about visitors to our website.

Data compilers.

From operating systems (from visitors to our website)

From clients (from visitors to their website)

Professional or employment-related information

E.g., general occupations categories.

Data compilers.

Inferred data

Modeled data predictive of consumers' interest in particular issues or causes.

Data compilers.

2. OUR DISCLOSURE AND SALE OF PERSONAL INFORMATION

We will share the information collected from and about you as discussed above for various business purposes, with service providers and with third parties including our customers. The chart below how and with whom we share or disclose personal information, and whether (based on the CCPA’s definition of “sell”) we believe we have “sold” a particular category of information in the prior 12 months.

Category	Categories of Third Parties We Share With	Whether We “Sold” This Category of Personal Information in the Last 12 Months
Identifiers , e.g., name; alias; telephone number, postal address; email address.	Direct response advertisers, including both commercial (for-profit) and Non-profit organizations	Yes
Characteristics of protected classifications under California or US law.	Direct response advertisers, including both commercial (for-profit) and Non-profit organizations	Yes
<i>E.g.</i> , race; color; religion; sex/gender; marital status; military or veteran status; national origin; ancestry; age (over 40) (which may be self-reported or inferred).		

Commercial or transactions information.

Information regarding charitable donations, recent consumer purchases..

Direct response advertisers, including both commercial (for-profit) and Non-profit organizations Yes

Internet or other electronic network activity information.

E.g., information about categories of consumer interests derived from online usage (such as the fact that someone tends to make donations online).

Direct response advertisers, including both commercial (for-profit) and Non-profit organizations. Yes

Professional or employment-related information

E.g., general occupation categories.

Direct response advertisers, including both commercial (for-profit) and Non-profit organizations Yes

Inferenced data

E.g. Modeled data predictive of consumers' interest in particular issues or causes.

Direct response advertisers, including both commercial (for-profit) and Non-profit organizations Yes

We also may share any of the personal information we collect as follows:

Sharing for Legal Purposes: In addition, we may share personal information with third parties in order to: (a) comply with legal process or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our Terms of Service, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of

third parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. We likewise may provide information to other companies and organizations (including law enforcement) for fraud protection, and spam/malware prevention, and similar purposes.

Sharing In Event of a Corporate Transaction: We may also share personal information in the event of a major corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

Sharing With Service Providers: We share any personal information we collect with our service providers, which may include (for instance) providers involved in tech or customer support, operations, web or data hosting, billing, accounting, security, marketing, data management, validation, enhancement or hygiene, or otherwise assisting us to provide, develop, maintain and improve our services.

Aggregate and Deidentified Information. We may aggregate and/or de-identify any information collected so that such information can no longer be linked to you or your device (“**Aggregate/De-Identified Information**”). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors, in our discretion.

3. OUR BUSINESS PURPOSES FOR COLLECTING AND SHARING PERSONAL INFORMATION

Generally speaking, we **collect** and **share** the Personal Information that we collect for the following purposes, as we also have described in our Privacy Policy:

Our Purposes for collecting, using and sharing Personal Information

Data marketing services, for example:

- Providing marketing information to our Clients (), and assisting those Clients with marketing, fundraising, customer service and engagement, and outreach activities.
- Helping our Clients identify and understand their consumers better, by providing insights about them.

Online targeting, for example:

- Creating or helping to create defined audience segments based on common demographics and/or shared (actual or inferred) interests or preferences (e.g., households with prospective students). To the extent that we do this, we work with a data partner that “matches” our or other Information through de-identification techniques (such as through coded data “hashing”) with online cookies and other identifiers, in order to target and measure ad campaigns online across various display, mobile and other media channels.
- Creating reports (such as performance analytics, statistics, metrics, and other details) for our customers based on marketing/donation campaigns.

Additional services, for example:

- Providing “verification” or data “hygiene” services, which is how companies update and/or “clean” their databases by either verifying or removing or correcting old, incorrect or outdated information.

Operating our Services, for example:

- Improving, testing, updating and verifying our own database.
- Developing new products.
- Operating, analyzing, improving, and securing our services, including our website.

Other internal purposes, for example:

For internal research, internal operations, auditing, detecting security incidents, debugging, short-term and transient use, quality control, and legal compliance. We sometimes use the information collected from our own website from social networks, from other “business to business” interaction (such as at trade shows) or from data compilers for the above, as well as for our own marketing purposes.

4. YOUR CALIFORNIA RIGHTS AND CHOICES

Without being discriminated against for exercising these rights, California residents have the right to request that we disclose what personal information we collect from you, to delete that information, and to opt-out of the sale of your personal information, subject to certain restrictions. You also have the right to designate an agent to exercise these rights on your behalf. This section describes how to exercise those rights and our process for handling those requests. (To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.) Sometimes, we act only as a “service provider” to our clients (for instance, if they provide information to us for analytics, processing or other data management services), in which case any consumer requests for opt-out, deletion or access to data must be made through that client: we therefore will forward any such requests to a named client, as feasible.

1. Right to Opt-out of the sale of your personal information.

California residents may opt out of the “sale” of their personal information. California law broadly defines what constitutes a “sale” – including in the definition making available a wide variety of information in exchange for “valuable consideration.”

Depending what information we have about you, and whether we have included any of it in our marketing products and services, we may have sold (as defined by California law) certain categories of information about you in the last 12 months, as described in the above table in Section 2 of this Addendum.

If you would like to opt out, you may do so as outlined on the following page: Do Not Sell My Personal Information.

1. Right to request access to your personal information

California residents also have the right to request that we disclose what categories of your personal information that we collect, use, or sell. You may also request the specific pieces of personal information that we have collected from you. However, we may withhold some personal information where the risk or level of potential sensitivity or harm from disclosure is too great to disclose the information.

1. **Right to request deletion of your personal information**

As a California resident, you may also request that we delete any personal information that we collected from you, such as if you have been a customer of ours. (Note that this is different from your right to “opt out” of us selling your personal information, which is described below; also note that we do not generally collect personal information directly from consumers.) However, we may retain personal information for certain important purposes, such as (a) to protect our business, systems, and users from fraudulent activity, (b) to address technical issues that impair existing functionality (such as de-bugging purposes), (c) as necessary for us, or others, to exercise their free speech or other rights, (d) to comply with law enforcement requests pursuant to lawful process, (e) for scientific or historical research, (f) for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations. Additionally, we need certain types of information so that we can provide our Services to you. If you ask us to delete it, you may no longer be able to access or use our Services.

1. **How to exercise your access and (if applicable) deletion rights**

California residents may exercise their California privacy rights by sending an email to [email address], submitting your request to [online web form], or by contacting us at [toll-free number].

For security purposes (and as required under California law), we will verify your identity – in part by requesting certain information from you — when you request to exercise your California privacy rights. For instance, if you request categories or specific pieces of personal information we have received about you, you may need to confirm your possession of an identifier (such as an email address) or to provide a piece of identification that confirms you are the person you claim to be.

Once we have verified your identity, we will respond to your request as appropriate:

- Where you have requested the categories of personal information that we have collected about you, we will provide a list of those categories.
- Where you have requested specific pieces of personal information, we will provide the information you have requested, to the extent required under the CCPA and provided we do not believe there is an overriding privacy or security concern to doing so.
- Where you have requested that we delete personal information that we have collected from you, we will seek to confirm whether your request is for an “opt out” or a “deletion”: because “opt out” or “do not sell” rights enable us to maintain your information for “suppression” purposes – i.e., to prevent us from selling information about you in the future (which is what many consumers requesting “deletion” actually desire to occur), we try to explain this in order to ensure we are meeting consumers’ preferences. (In addition, “deletion” rights only apply to information that we have collected “from” consumers – which does not apply to much of the information in our databases.)
- Upon completion of the above process, we will send you a notice that explains the categories of personal information we were able to locate about you, whether we (1) deleted, (2) deidentified, or (3) retained the information we collected from you. Certain information may be exempt from such requests under applicable law.

If we are unable to complete your requests fully for any of the reasons above, we will provide you additional information about the reasons that we could not comply with your request.

1. **Right to nondiscrimination.** We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise these rights.
2. **Information about persons under 16 Years of age**

We do not knowingly collect personal information from minors under 16 years of age in California unless we have received legal consent to do so. If we learn that personal information from such California residents has been collected, we will take reasonable steps to remove their information from our database (or to obtain legally required consent).

1. **Authorized agents**

You may also designate an agent to make requests to exercise your rights under CCPA as described above. We will take steps both to verify the identity of the person seeking to exercise their rights as listed above, and to verify that your

agent has been authorized to make a request on your behalf through providing us with a signed written authorization or a copy of a power of attorney.

To view the Lake Group Media Privacy Policy go [here](#).