COPPA Policy

Giving-Tree Associates, LLC d/b/a Passport For Good ("Giving-Tree") values the privacy of children and of all of its users. This COPPA Privacy Policy ("COPPA Policy") is designed to comply with the Children's Online Privacy Protection Act ("COPPA") and contains important information about how we collect, use, and disclose the personal information we collect from children under thirteen years old who use our Software.

The Software operates to provide community engagement between individual users ("Volunteers") and organizations, which may include schools, school districts, businesses and not-for-profit community service sponsors ("Organizations"; Organizations and Volunteers are collectively referred to herein as "Users"). The Software is used for purposes including identifying and tracking volunteer hours, funds raised, donations, and these opportunities in a User's community, and providing Users an easy and reliable method of tracking, verifying and documenting such participation.

This COPPA Policy applies to the information we collect from children under 13 through use of the Software.

Giving-Tree will handle children's personal information as described in this COPPA Policy. Any personal information we collect about other users (e.g., teens and adults) will be treated in accordance with the Giving-Tree Privacy Policy ("Privacy Policy"). The use of our Software and any dispute over privacy, is subject to this COPPA Policy, the Privacy Policy, our Purchase Order Terms and Conditions, and our End User License Agreement, including its applicable limitations on damages and the resolution of disputes. Our Purchase Order Terms and Conditions, and End User License Agreement and Privacy Policy are incorporated by reference into this COPPA Policy.

Who Will Collect Information About Children?

Giving-Tree operates this website, provides access to, and use of, the Software, and will collect children's personal information as described in this COPPA Policy and our Privacy Policy. We can be contacted at:

Mailing Address: 159 Delaware Avenue #226, Delmar, NY 12054-1312

Email Address: support@passportforgood.com

Phone Number: (518) 227-0755

What Information Do We Collect About Children and Why?

As described in further detail below, we collect some personal information from children to accomplish the intended purpose of the Software, including, identifying and tracking volunteer hours, funds raised, donations and these opportunities in a user's community, and providing user's and easy and reliable method of tracking, verifying and documenting such participation.

How is Information Collected?

We may collect information about children directly from children, as well as automatically through a child's use of our Software. We will not require a child to disclose more information than is reasonably necessary to use our Software. We do provide parents with a copy of a notice of our privacy practices as posted on the Software platform.

Information We Collect Directly

From children under 13, we collect their usernames, date of birth, address, phone number, email address, school, and graduation year, clubs and organizations of which the child is a member or volunteer, profile photograph, and the identity and location of the organization for which the child performs services or raises funds. Parents may ask us to stop collecting personal information from their child by emailing us at support@passportforgood.com; however, in such cases the child may not be able to use the Software to its fullest extent. If a parent directs us to stop collecting and using a child's personal information, we must disable his or her use of our Software to ensure that no information is collected.

Information We Collect Automatically

We may automatically collect statistical information about a child's use of our Software through cookies and other technologies. Usage of a cookie is in no way linked to personally identifiable information in our products and email messages. The child may always choose not to accept cookies, but he or she may not be able to use some of our Software.

Other Information We Collect About Children

We collect information about children's performance and activities through his or her use of the Software. This information is for internal use only and will not be disclosed to other entities; however, we do not use this information in a personally identifiable form for our own commercial purposes. Before we analyze or use any activity data for our own commercial purposes, we de-identify and/or aggregate such information.

How We Use Children's Information

We use personal information collected from children for the following purposes:

- To provide our Software; and
- To respond to customer service and technical support issues and requests.

We de-identify and/or aggregate the information we collect from children under 13 before we use it for any other purposes, as noted below.

Unique Identifiers. We only collect and use unique identifiers, such as IP addresses, as necessary to operate our products and services, including to maintain or analyze their functioning; perform network communications; authenticate users or personalize content; and protect the security or integrity of users of our Software. We never use unique identifiers to track users across third-party apps or websites.

Aggregate or De-identified Information. We may use aggregate or de-identified information about children for research, analysis, and similar purposes. When we do so, we strip out names,

email, contact information, and other personal identifiers. We may use aggregate or de-identified information for the following purposes:

- To better understand how users access and use our Software;
- To improve our Software and respond to user desires and preferences; and
- To conduct research or analysis, including research and analysis by third parties.

How We Share Children's Information

We do not sell children's personal information, and a child may not make his or her personal information public through our services. Giving-Tree will only disclose children's personal information, if required to do so by law, or as otherwise stated in this privacy policy, or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on Giving-Tree; (2) protect and defend the rights or property of Giving-Tree and others, including among other things to enforce our Terms of Service; (3) act under exigent circumstances to protect the personal safety of its members or the public; (4) to correct technical problems and malfunctions in how we provide our service to you and to technically process your information; (5) to take precautions against liability; (6) to respond to claims that information you have submitted to Giving-Tree has violated the rights or interests of a third party; or (7) as permitted by law or to provide information to law enforcement agencies. Also, certain technical processing of User content is required for: (1) providing the services contemplated by the Software; (2) conforming to technical requirements of connecting networks; (3) conforming to the limitations of the service; or (4) other similar technical connecting requirements.

We may disclose aggregated information about users and information that does not personally identify any child, without restriction.

Your Rights to Review, Delete, and Control Our Use of Children's Personal Information

Parents have a right to review the information we have collected about their children and students, respectively, and to delete it, and to tell us to stop using it. To exercise these rights, you may contact us at <u>support@passportforgood.com</u>. You will be required to authenticate yourself as the child's parent to receive information about that child. Please note that copies of information may remain in a cached or archived form on our systems after you request us to delete it.

Changes to This COPPA Policy

We may change this COPPA Policy from time to time, so please be sure to check back periodically. We will post any changes to this COPPA Policy on our website <u>www.passportforgood.com</u>

If we make any changes to this COPPA Policy that materially affect our practices with regard to the personal information we have previously collected from a child, we will endeavor to provide you with notice in advance of such change by highlighting the change on our website.