

PRIVILEGED & CONFIDENTIAL

UM FOUNDATION PRIVACY POLICY

EFFECTIVE DATE: February 17, 2023

UM Foundation (“we”, “us” or “our”) values your privacy. In this Privacy Policy (“Policy”), we describe how we collect, use, and disclose personal information that we obtain about visitors to our website at www.theumf.org (the “Site”) and users of the chatbot text messaging services available through our platform (collectively, the “Services”), and how we use and disclose that personal information.

The Services provide an open platform for youth to freely express themselves, without judgment.

By visiting the Site, or using any of our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site or Services, and any dispute over privacy, is subject to this Policy and the Terms of Use, including its applicable limitations on damages and provisions on the resolution of disputes.

The Information We Collect About You

We collect personal information about you directly from you and from third parties, as well as automatically through your use of our Site or Services.

Information We Collect Directly From You. You may browse certain areas of the Site without registering with us or providing us personal information. If you are over the age of 13, we will only collect your phone number and birthdate. If you are under the age of 13, we will collect your phone number, birthdate, and additional information to obtain verified parental consent, which may include parent’s name, parent’s email address, consent form, and a form of identification. In addition, our Services will receive and analyze your communications and provide a response using our artificial intelligence and machine learning platform. Please note that you are not communicating with a live human being. We will generally store and use your personal information only for so long as is necessary for the uses we collected the information for as described in this Policy and to comply with applicable laws.

In addition, if you are providing personal information for third parties in connection with using our Services, you are responsible for ensuring that you have all required permissions and consents to provide such personal information to us for use in connection with the Services and that our use of such personal information to provide the Services does not violate any applicable law, rule, regulation, or order.

Information We Collect Automatically. We may automatically collect the following information about your use of our Site or Services through cookies and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; the length of time you visit our Site or use our Services; and the referring URL, or the webpage that led you to our Site. We may combine this information with personal information that we have collected about you, including, where applicable, your username, name, and other personal information. Please see the “Our Use of Cookies and Other Tracking Mechanisms” section below for more information.

How We Use Your Information

We use your information, including personal information, for the following purposes:

- ***Provide Our Site and Services.*** We use your personal information to provide the Site and Services, interact with the communications you provide to the AI Platform, communicate with you about your use of our Site and Services, respond to your inquiries, and provide customer service.

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- ***Provide Personalized Services.*** We may use your personal information to tailor the content and information that we may send or display to you, to offer location customization, personalized help and instructions, and to otherwise personalize your experiences while using the Site and Services.
- ***Improve and Develop Our Services.*** We use your personal information to: (a) ensure our Site and Services are working as intended; (b) operate our business; (c) better understand how users access and use our Site and Services, both on an aggregated and individualized basis, (d) develop, maintain, protect and improve our Services, and (e) perform research and analytics, including to analyze and report on usage and performance of our Site and Services.
- ***Compliance.*** We may use your personal information to: (a) detect, investigate, and prevent activities on our Site that may violate our Terms of Service, could be fraudulent, violate copyright or other rules, or that may be otherwise illegal, (b) comply with legal requirements, (c) defend or exercise legal claims, (d) respond to law enforcement or governmental investigations or requests, and (e) protect our rights and the rights and safety of our users and others.

How We Share Your Information

We may share your information, including personal information, as follows:

- ***Consent.*** Where you have provided consent, we share your information, including personal information, as described at the time of consent.
- ***Affiliates.*** We may disclose the personal information we collect from you to our affiliates or subsidiaries solely for the purpose of providing Services to you; however, if we do so, their use and disclosure of your personal information will be maintained by such affiliates and subsidiaries in accordance with this Policy.
- ***Service Providers.*** We may disclose the information we collect from you to third party vendors, service providers, contractors, or agents who perform functions on our behalf.
- ***Business Transfers.*** If we are acquired by or merged with another company or entity, if substantially all of our assets are transferred to another company or entity, or transferred as part of a bankruptcy proceeding, or are in negotiations for any of these types of transactions, we may transfer the information we have collected from you to the other company or entity.
- ***In Response to Legal Process.*** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena.
- ***To Protect Us and Others.*** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.
- ***Aggregate and De-Identified Information.*** We may share aggregate or de-identified information about users and their use of the Services with third parties and publicly for marketing, advertising, research or similar purposes.

Please note that any third party with whom we share your personal information will provide the same or equal protection of personal information as provided in this Policy.

We do not sell your personal information to third parties.

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Our Use of Cookies and Other Tracking Mechanisms

We and our service providers use cookies and other tracking mechanisms, such as web beacons, to track information about your use of our Site and Services. We may combine this information with other personal information we collect from you (and our third party service providers may do so on our behalf).

Currently, our systems do not recognize browser “do-not-track” requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies), but such disabling will impair use of the Site and Services.

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Site and Services. There are two types of cookies: session and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Site. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Site.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will not be able to browse certain areas of the Site or use the Services.

Third Party Analytics

We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site and our Services. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties. To opt-out of Google Analytics and find out more about their privacy practices, see <https://tools.google.com/dlpage/gaoptout>.

Third-Party Links

Our Site and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third party websites. We are not responsible for the information practices of such third party websites.

Security of My Personal Information

We have implemented commercially reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee 100% security.

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You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

What Rights Do I Have Regarding My Personal Information

You may request access, a copy, modification or deletion of personal information that you have submitted to us by contacting us at customerservice@theumf.org. We will use reasonable efforts to accommodate such requests to the extent required by law, provided that we may be required to retain personal information to comply with legal obligations, accounting requirements, or for other business purposes. We may request additional information to verify the identity of the requesting party before responding to a request. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Site for a period of time.

Location of Personal Information

Our Site and Services are offered from the United States. We store any personal information we collect in the United States. If you access the Services or Site from outside the United States, you agree to the transfer of your information to the United States, which may have less protections for your personal information than your jurisdiction of residence.

Children's Privacy Notice

This Children's Privacy Notice provides additional details regarding the special precautions taken to protect the privacy of children on our Site and Services. If you are under 13 years old, your parents or legal guardian must provide their consent to use our Services at customerservice@theumf.org.

- We do not collect personal contact information from children under 13 without the consent of a parent or legal guardian, except in limited circumstances authorized by law.
- We collect some information (like IP address, operating system, etc.) automatically and use technology like cookies to provide functionality and support our operations. We obtain consent where required.
- We do not ask for more personal information than is necessary for a child to participate in our Services.
- We take reasonable steps to prevent children from posting or publicly disclosing personal information.
- Parents can access and ask us to update or delete their children's information by emailing us at customerservice@theumf.org.

If your child has created an online account through one of our Services, you may also have the opportunity to manage your child's account online.

Contact Us

If you have questions about the privacy aspects of our Site or Services or would like to make a complaint, please contact us at customerservice@theumf.org.

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Changes to this Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on the Site. If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site or if you have signed up for the Services, providing notice to the phone number you have provided.