



Data Privacy and Protection Policy

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PURPOSE AND SCOPE

This policy covers all websites from the YourCause.com domain, either through a-record, sub-domain, forwarding, re-directing (collectively "YourCause.com") or any other domains owned by YourCause, LLC ("YourCause").

YourCause, LLC ("YourCause", "us", "we", or "our") provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of YourCause.com (the "Site"; Site and any login service, API, or web service collectively, the "Services").

Any agreements between YourCause, LLC and the company contracting our Services ("Company"), and their respective terms and conditions regarding data, privacy and accessibility, may take precedent over this Privacy Policy, as stated within such executed agreements.

This Privacy Policy applies only to information that is provided to us through the Services (including that which we may collect on your behalf) when using our Site Services. By using this Site, you indicate your acceptance of this Privacy Policy and the collection and use of your information in accordance with this policy.

As used in this policy, the terms "using" and "processing" information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.

INFORMATION COLLECTION AND USE, INCLUDING DATA TRANSFERS RECEIVED FROM CLIENTS AND THIRD PARTIES

i. Personally Identifiable Information

- In the course of using the Services (including a Hosted Application), we may ask you to provide us with certain personally identifiable information ("PII") that can be used to contact or identify you and administer your account. Personal Information includes, but is not limited to, your name, phone number, credit card or other billing information, email address and home and business postal addresses. We transmit credit card information directly to our processing partners through a secure (as they exist at the time this policy is implemented) API integrated within the Site over a reasonably secure connection. We do not store any credit card details (credit card number, expiration date, Card Verification Value). We do store the user's contact information (more details provided below).

- We use your Personal Information (in some cases, in conjunction with your Non-Identifying Information) to provide the Services, complete your transactions, administer your inquiries, and as further explained below.
- Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences). We may combine your Personal Information with Non-Identifying Information and aggregate these two sets of information with information collected from other YourCause digital properties to provide you with a better experience, to improve the quality and value of the Services and to analyze and understand how our Site and Services are used. We may also use the combined information to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.
- YourCause does not sell, lend, rent, or lease your Personally Identifiable Information. Except as described in this Privacy Policy, your Personally Identifiable Information will be used only by YourCause and its controlled subsidiaries, affiliates, agents, or contractors, and verified partners and your Personal Information will not be disclosed to any non-qualified partner and/or third party without your prior consent.
- YourCause will store all collected PII until account deletion is requested by the entity contracting with YourCause to provide such services. At that point, the requested PII will be scheduled for deletion. Some data may not be erasable, such as activity listings in public activity feeds, which are made of first name and last name initial.
- We do not share your credit card information with any entity other than the payment card processor. We do not retain your credit card information.
- Personal information may be disclosed to judicial or other government agencies subject to warrants, subpoenas, or other governmental orders.

ii. Donation Processing

YourCause processes donations through our partner APIs. Visit the websites for Ammodo, CanadaHelps, GlobalGiving, Heartland Payment Systems, Network For Good, and United Way Worldwide for additional information related to tax deductions, tax receipt, processing fees and the privacy policies for those websites.

iii. Cookies

Like many websites, we use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We and our third-party service

providers use session cookies, which link your actions during a particular browser session and expire at the end of that session, as well as persistent cookies, which remain on your device and allow us to remember your actions or preferences across multiple browser session. At YourCause, we make use of cookies for the following business purposes:

- **Security** – We use authentication cookies to ensure you only access data intended for your view and prevent unauthorized access of your credentials and information.
- **Operational** – URL redirection is a process by which our Site commands your browser to redirect you to a page based on the value stored in the redirection cookie we configured.
- **Analytical** – To better understand how our users interact with our Site and aggregate information on users' engagement with our Services, we use an analytics tool that may store cookies on your device on our behalf

If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. The Help feature on most web browsers will tell you how to prevent your browser from accepting new cookies, how to receive notice when a new cookie is set, and how to disable cookies altogether. However, if you choose to block or delete cookies, certain features of our websites may not operate correctly and the following may occur:

- If you change the settings on your web browser, you will be presented with the consent option again the next time you visit our website.
- Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit this website.

For further information about deleting or blocking cookies, please visit:

<http://www.allaboutcookies.org/manage-cookies/>.

EU GENERAL DATA PROTECTION REGULATION – 2016/679 (GDPR)

The General Data Protection Regulation 2016/670 ("GDPR") of the European Parliament and of the Council is a newly enacted law governing the protection of natural persons of the European Union with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation). The personal data elements concerned include but are not limited to the following:

- Personal Identifiable Information (PII)
 - First Name
 - Last Name

- Address
- Email
- Images/Photos
- IP Address
- Financial data including salary information
- Derivative data generated by SaaS application

As a vendor handling and storing EU residents' data outside the European Economic Area (EEA), YourCause is required to comply with the GDPR directive.

The key elements of the GDPR applicable to YourCause's services include the following articles.

Article 17 | Data Retention Controls – The GDPR enforces the right of EU natural persons to be forgotten. YourCause has developed a process for data erasure requests that can be leveraged by EU citizens who wish to have their data purged.

Article 32 | Data Protection Controls – YourCause has built-in data protection controls in its environment and throughout the company and employs cryptographic technologies to protect data at rest and in-transit. This control is audited on a quarterly basis to identify areas of weakness, if any.

Article 33/34 | Breach Notification – The GDPR requires data controllers and processors to report breaches within 72 hours of discovery. YourCause's notification policy requires clients be alerted within 24 hours of confirmation of a breach. Furthermore, the company continues in its pursuit of deploying additional technical controls to aid with Incident Response efforts.

As of the May 25th, 2018 effective date, YourCause has taken necessary steps to rollout extra security controls and processes in addition to those already in place to strengthen its current program and ensure full compliance with the General Data Protection Regulation. These measures include an updated application which allows the user to easily request data erasure (see Changing or Deleting Your Information) and a binding data protection agreement developed for third-party partners processing or controlling EU persons' data records in tandem with YourCause.

CHANGING OR DELETING YOUR INFORMATION

All registered users may review or update the Personal Information in their registration profile by contacting YourCause and/or the appropriate individuals at their employer. Users who wish to delete their information can do so by submitting the request in the "My Account" section of the CSRconnect application. The modal will contain instructions on the process and will automatically send a notification to the YourCause Security Team to take action. The Security Team will use commercially reasonable efforts to honor the request and will work with the employer contracting with YourCause

to ensure the data is properly removed within a reasonable time (though some information may not be erasable, as described above). The process can take up to 30 days. If a user's profile information is deleted, their account will become deactivated. YourCause may retain an archived copy of the user's records as required by law.

SECURITY

At YourCause, we are very concerned with safeguarding all information, as the protection of the data you share with us is very important. All sensitive data you transmit to us via our Site is encrypted using industry standards as they exist at the time this policy is implemented both in transit over HTTPS using the Transport Layer Security protocol ("TLS") and at rest using Transparent Data Encryption and other encryption standards of data at rest.

All sensitive data we collect from you (such as credit card information for the purpose of making a donation) is encrypted and transmitted to our processing partner when applicable, in a reasonably secure manner (where the data is encrypted over TLS using the Advanced Encryption Standard with a key length of 256 bits). You can verify the connection security by looking for a lock icon on your browser address bar.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your electronically stored PII in accordance with appropriate legal or regulatory requirements, taking into account the need to accommodate (i) legitimate requests by law enforcement and (ii) any measures reasonably necessary to investigate the scope of the breach and restore the reasonable integrity of the data system.

U.S. – SWISS SAFE HARBOR FRAMEWORK

YourCause complies with the U.S.-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. YourCause has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the U.S.-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/>

In compliance with the U.S.-Swiss Safe Harbor Principles, YourCause commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss citizens with inquiries or complaints regarding this privacy policy should first contact YourCause at: security@yourcause.com

YourCause has further committed to refer unresolved privacy complaints under the U.S.-Swiss Safe Harbor Principles to PrivacyTrust, an alternative dispute resolution provider. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit PrivacyTrust's dispute resolution portal at <https://www.privacytrust.com/drs/applicable> for more information or to file a complaint. The services of the PrivacyTrust are provided at no cost to you.

This Safe Harbor Privacy Policy Statement (the "Policy") applies to all personal information received by YourCause in the United States from Switzerland, in any format, including electronic, paper or verbal.

EU – U.S. PRIVACY SHIELD FRAMEWORK

YourCause recognizes that the EU has established certain protections regarding the handling of EU Personal Data, including requirements to provide adequate protection for EU Personal Data transferred outside of the EU. To provide adequate protection for certain EU Personal Data about corporate customers, clients, suppliers, and business partners received in the US, YourCause has elected to self-certify to the EU-US Privacy Shield Framework administered by the US Department of Commerce ("Privacy Shield").

YourCause has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Correction, Enforcement and Dispute Resolution. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>. To view our certification under Privacy Shield, please visit <https://www.privacyshield.gov/list> or scroll down to section xi.

You may direct any complaints pertaining to our collection and/or use of your information to us at: security@yourcause.com or by mail at YourCause Security Office 6111 West Park Blvd. Suite 1000 Plano Texas, 75093. In compliance with the EU-U.S. Privacy Shield Principles, YourCause commits to resolve complaints about your privacy and our collection or use of your personal information within 45 days. If you are unsatisfied with the resolution of your complaint, please contact the independent recourse mechanism listed below:

- **HR Data Recourse Mechanism**

If a complaint involving HR data remains unresolved, individuals should contact the state or national data protection or labor authority in the jurisdiction where the individual works for resolution. YourCause commits to cooperate with the competent European Union Data Protection Authorities (DPAs) and comply with the advice given by such authorities with regard to data transferred from the EU including human resources data transferred from the EU in the context of the Services offered by YourCause. In the event that YourCause or the DPAs

determine that YourCause did not comply with this Policy or Privacy Shield principles, YourCause will take appropriate steps to address any adverse effects and to promote future compliance, comply with any directive given by the DPAs where the DPAs have determined that YourCause should take specific remedial or compensatory measures for the benefit of individuals affected by any non-compliance with the Privacy Shield principles. A listing of all EU Data Protection Authorities (“DPAs”) is located at:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.html

- **Non-HR Data Recourse Mechanism**

YourCause has committed to refer unresolved privacy complaints under the EU-U.S. Privacy Shield Principles to PrivacyTrust, an alternative dispute resolution provider. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit PrivacyTrust’s dispute resolution portal at <https://www.privacytrust.com/drs/applicable> for more information or to file a complaint. The services of the PrivacyTrust are provided at no cost to you.

Finally, as a last resort and in limited situations, a binding arbitration option will also be made available to EU individuals to address residual complaints not resolved by any other means.

i. Scope

The EU-U.S. Privacy Shield Framework applies to all personal information received by YourCause and emanating from the EEA and from Switzerland (collectively “EU Personal Data”), in any format, including electronic, paper or verbal. This policy is applicable to all YourCause entities in the United States.

ii. Privacy Principles

The privacy principles in this Policy have been developed based on the EU-U.S. Privacy Shield Framework and the U.S.-Swiss Safe Harbor Framework.

iii. Notice

YourCause is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

YourCause may be required to disclose an individual’s personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Where YourCause collects personal information directly from individuals in the EEA, it will inform them about the purposes for which it collects and uses personal information about them, the types of non-agent third parties to which YourCause discloses that information, the choices and means, if any,

YourCause offers individuals for limiting the use and disclosure of personal information about them, and how to contact YourCause. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to YourCause, or as soon as practicable thereafter, and in any event before YourCause uses or discloses the information for a purpose other than that for which it was originally collected.

Where YourCause receives personal information from its subsidiaries, affiliates or other entities in the EEA, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

iv. Choice

YourCause may offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive personal information, YourCause will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

YourCause will provide individuals with reasonable mechanisms to exercise their choices.

v. Data Integrity

YourCause will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. YourCause will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

vi. Onward Transfers to Agents and Third Parties

In cases YourCause leverages the use of onward transfer to third parties of Personal EU Data, YourCause is potentially liable and will obtain assurances from its agents that they will safeguard EU Personal Data consistently with this Policy. Examples of appropriate assurances that may be provided by agents include: a contract obligating the agent to provide at least the same level of protection as is required by the relevant Privacy Principles, certification by an agent, or being subject to another European Commission or Swiss FDPIC adequacy finding (e.g., companies located in Canada). Where YourCause has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, YourCause will take reasonable steps to prevent or stop the use or disclosure.

vii. Access and Correction

Upon request, YourCause will grant qualified and approved individuals reasonable access to EU Personal Data that it holds about them. In addition, YourCause will take reasonable steps to permit

individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

viii. Security

YourCause will exercise generally acceptable industry standards coupled with commercially reasonable precautions to protect EU Personal Data in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

ix. Enforcement

YourCause will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that YourCause determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

x. Limitation on Application of Principles

EU Personal Data will not be processed in a way that is incompatible with or materially different from the purposes for which it has been collected or subsequently authorized by the individual. Reasonable steps will be taken to ensure that EU Personal Data is reliable for its intended use, accurate, complete and current. Further, all EU Personal Data will be retained only for as long as it serves the purposes for which it was collected or subsequently authorized by the individual.

Adherence by YourCause to all the aforementioned Policies and Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; (b) to the extent necessary to meet national security, public interest or law enforcement obligations; and (c) to the extent expressly permitted by an applicable law, rule or regulation.

xi. YourCause Privacy Shield Certification



[Self-Certify](#) [Privacy Shield List](#) [Audiences](#) [About](#)

Industries

Information and Communications Technology
Software

Participation

EU-U.S. PRIVACY SHIELD FRAMEWORK: ACTIVE

Original Certification Date: 3/31/2017
Next Certification Due Date: 5/24/2019
Data Collected: HR, NON-HR

SWISS-U.S. PRIVACY SHIELD FRAMEWORK: ACTIVE

Original Certification Date: 5/24/2018
Next Certification Due Date: 5/24/2019
Data Collected: HR, NON-HR

PURPOSE OF DATA COLLECTION

YourCause acts as an agent on behalf of employers to provide a fully hosted, web based, software service to engage employees in volunteer and giving activities. The platform, referred to as 'CSRconnect' is offered within a 'software as a service' (SaaS) model. YourCause collects and stores personal details of its users such as names and addresses, together with other information which may be necessary for providing services to the aforementioned Users. Users are required to provide YourCause with such data in connection with the usage of the product. The data may be used for the following purpose: daily operations of the CSRconnect application, for charitable donation, volunteering activities, handling customer complaints and enquiries, making disclosure under the requirements of any law applicable, and any other directly related matters. Without such data, YourCause may not be able to provide services to its customers. YourCause will obtain proof from its third party agents that they will safeguard personal information consistently with this Policy.

Privacy Policy

HR AND NON-HR DATA

Document: [YourCause, LLC Privacy Policy](#)
Description:
YourCause, LLC Privacy Policy
Effective Date: 5/9/2018

VERIFICATION METHOD

Self-Assessment

Dispute Resolution

QUESTIONS OR COMPLAINTS?

If you have a question or complaint regarding the covered data, please contact YourCause, LLC at:

Security Council

security@yourcause.com

Security Council Member

Phone: (972) 755-3960

YourCause, LLC

YourCause, LLC. Corporate - Plano, Texas

6111 W Plano Pkwy, #1000YC

Plano, Texas 75093

Privacy Shield organizations must respond within 45 days of receiving a complaint.

If you have not received a timely or satisfactory response from YourCause, LLC to your question or complaint, please contact the independent recourse mechanism listed below

HR RECOURSE MECHANISM

[EU Data Protection Authorities \(DPAs\)](#)

[Swiss Federal Data Protection and Information](#)

[Commissioner \(FDPIC\)](#)

NON-HR RECOURSE MECHANISM

[PrivacyTrust Privacy Shield Program](#)

Appropriate statutory body with jurisdiction to investigate any claims against YourCause, LLC regarding possible unfair or deceptive practices and violations of laws or regulations covering privacy [Federal Trade Commission](#)

LINKS TO OTHER SITES

Our Services, from time to time, may contain links to other websites. If you choose to click on another third-party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise complete control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other sites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

OUR POLICY TOWARD CHILDREN

The Site and Services are not directed to children under 13. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

BUSINESS TRANSFERS

In connection with a business transaction where an entity acquires all or substantially all of the business or assets of YourCause, whether by merger, acquisition, or reorganization or in the event of bankruptcy, YourCause may transfer to or otherwise share with such acquiring entity, all data associated with the product and services provided by YourCause, subject to any agreements between the Company and YourCause.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of January 2017 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately upon validation. YourCause reserves the right to amend this Privacy Policy from time to time.

You are advised to consult this policy regularly for any changes. Please note that a notice will be posted YourCause web pages at www.yourcause.com and www.csrconnect.me whenever this Privacy Policy is changed in a material way.

CONTACT

Questions or comments regarding this Policy should be submitted to the YourCause Security Office by mail to:

YourCause Security Office

YourCause, LLC

6111 W. Plano Parkway – Suite 1000YC

Plano, Texas 75093

security@yourcause.com

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- April 2017
- April 2018
- October 2018