

Privacy Policy *

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Your privacy is important to us. This Privacy Policy describes the information Givebacks, Inc. (“Givebacks,” “we,” “us,”) collects in connection with our Services, how Givebacks processes it, and for what purposes.

The personal information we collect, and the purposes for which we process it, depend on the context of your interactions with us and the Services you use. When we refer to the “Services” in this Privacy Policy, we mean both our Websites and our Offerings:

- “Websites” means www.givebacks.com and any other websites we operate and that include a link to this Privacy Policy.
- “Offerings” means individual products and services that we make available to legal entities including school districts, schools, school support organizations, parent-teacher organizations, and other governmental or nonprofit organizations (each, an “Organization”) and their individual supporters that sign up for an account with us, or with whom we otherwise enter into an agreement to provide those products and services. Offerings include our cloud-based software applications, mobile applications, browser extensions, shopping rewards and card-linked offer programs, and any other products or services that we make available and that include a link to this Privacy Policy.

The **Offering-Specific Details** section of this Privacy Policy provides additional relevant information about how we collect, use, and disclose personal information as part of our provision of certain Offerings. To the extent there is a conflict between the information this Privacy Policy provides regarding a particular Offering in the **Offering-Specific Details** section and other parts of this Privacy Policy, the Offering-Specific Details section will control as to that particular Offering.

By using the Services, you acknowledge that you have read this Privacy Policy. If you do not agree to the handling of your personal information as described in this Privacy Policy, please do not use the Services or provide your personal information to us.

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The Information We Collect and How We Collect It

The information we collect and the sources from which we collect it depend on the context of your interactions with us, the choices you make, and the Services and features you use. This section generally describes the information we collect through the Services and how we collect it. For additional details regarding the information collected through specific Offerings, please see the **Offering-Specific Details** section of this Privacy Policy.

Information You Provide to Us Directly

You may choose to provide certain information to us when you use the Services. The categories of information we generally collect through this method are summarized below.

- **Contact Information**

We collect personal information that you submit to us through contact forms that we make available through the Services, including to enable you to inquire about the Services and to request support for your use of the Services. This information may include personal information such as your name, your email address, your mailing address, your telephone number, and any other information you submit as part of your inquiry or request.

If you represent or are part of an Organization that uses our Services, the information you provide may also include the name and contact information for your organization and your role in the organization.

- **Account Information**

When you register to create an account to use the Services, we will ask you to provide your email address and create a password to access your account, and may ask you to provide other contact and demographic information such as your name, your mailing address, and your date of birth.

We may also ask you to select an Organization to benefit from your use of the Services, and may collect information you submit to search for and select a cause, which may include the city, zip code, and/or cause and Organization name.

- **Financial and Payment Account Information**

If you use the Services to make purchases from, or payments or donations to Organizations that use our Services, we will collect your payment and billing information, which may include information such as your payment card number, expiration date, and security code.

If you use the Services to earn and redeem cashback and other rewards, we will also collect information associated with your chosen payment method, which may include your bank account number and routing information, or your account credentials for your online payment service provider.

- **Organization Information**

If you use the Services on behalf of an Organization, we may ask you to set up an administrator or other organization account. The information we collect to set up your Organization account may also include your contact details such as your name, email address, and telephone number; the name and address of your cause or organization and a description of your Organization's products and services; and your Organization's payment account details to facilitate the collection and receipt of payments associated with transactions made through the Services.

- **Applicant Information**

The Services may allow you to apply for employment with Givebacks by filling out an application form and uploading your resume. The information we collect through this method may include your name, email address, telephone number, mailing address, a link to your social media profile(s), information about your experience and why you are interested in working with us, information about your ability to legally work in the United States, and any information contained in the resume, cover letter, or additional files that you upload and submit to us.

We use this information to evaluate your qualifications and other related recruiting and hiring purposes.

Information We Collect Automatically

We collect certain information automatically when you use the Services, which may include information set out in the categories below. We collect some of this information through tracking technologies such as cookies and web beacons. For more information, please see the **How We Use Cookies and Other Tracking Technologies** section of this Privacy Policy.

- **Device and Other Technical Information**

When you use the Services we may automatically collect information about the computer, device, hardware, or software you use to access the Services, such as your Internet Protocol ("IP") address or other transactional or identifier information for your device (such as device make and model, information about device operating systems and browsers, or other device or system-related specifications), and, when you launch any of our Services from a mobile device, the unique device ID for your mobile device.

We may also collect information and statistics about your interaction with the Services, which may include the URLs of the pages that you have visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, the application you used, how long you used the application and when, and other similar usage statistics; and information that facilitates a safer and more personalized experience, such as user identification information, saved preferences, and device identifiers or usage information for authentication and fraud prevention purposes.

- **Shopping and Rewards Information.**

When you use the Services to shop for offers from our participating merchants, we will automatically collect information that may include the participating merchants, products, services, and offers you searched for, viewed, or clicked; the websites you visit and your browsing activity on those sites; and transaction information related to our Services, including purchase confirmation data and rewards accrued through the Services.

- **Location Information**

When you use the Services, we may collect information about your location from your device, including your approximate location derived from your IP address, as well as precise location information that is provided through the GPS and other functionality on devices you use to access the Services. We will use this location information to customize the Services, including offers that are shown to you when you use the Services.

Information We Receive from Third Parties

When you use the Services, we may also receive information about you from third parties with whom we work, which may include the categories of information set out below.

- **Information We Receive from Participating Merchants and Other Business Partners**

When you use the Services to shop at participating merchants for goods and services, in addition to the information we may collect automatically through the Services, we may also receive information from those participating merchants and other business partners with whom we work to provide the Services, including the participating merchant name, transaction date, transaction amount, and other information relating to your shopping activity and purchases.

- **Information we Receive from Causes, Referral Partners and Other Users**

We may receive your personal information, including your name and email address, from Organizations and referral partners that we work with, as well as from other users of our Services, if they think you may be interested in our Services and/or invite you to participate.

- **Information We Receive from Third-Party Services You Use to Connect to our Services**

If you use an account that you have established on a third-party service such as Facebook or Apple to connect with our Services, we may receive certain information about that account from the third-party service, the nature and extent of which will depend on the privacy policies and settings for those third-party services.

- **Information We Collect from Social Media Networks**

If you choose to interact with us or our partners on social media by posting to our pages, tagging us (or using certain hashtags or other identifiers) in posts, or participating in activities, we may collect certain information from the social media account you use to interact with us, including the name associated with the account, the account handle, recent activity, the content of any posts in which we are tagged, and other information that may be contained on your social media profile to allow us to respond to the posts and understand and engage with our audience.

- **Information We Receive from Other Third-Party Sources**

In addition to the sources noted above, we may receive your name and other contact information from publicly-available and commercially-available sources such as government databases and data brokers. We may also receive information, such as device information and browsing information, from third parties for marketing and analytics purposes, for example to provide you with personalized ads on our Services and in third-party websites and mobile services.

De-Identified Information

We may collect, or use personal information we collect to create, De-Identified Information. “De-Identified Information” means information that is not reasonably linkable to you, and from which all direct and indirect identifiers, including names, ID numbers, dates of birth, demographic information, location information, and your school information, has been removed.

We will not attempt to re-identify De-Identified Information and we will not transfer De-Identified Information to any third party unless that party also agrees not to attempt to re-identify the information. Otherwise, we may use and disclose De-Identified Information for any lawful purpose, without restriction.

How We Use Your Information

We may use information that we collect about you or that you provide to us, including any personal information, for the following purposes:

- To operate and provide the Services to you, including to process your registration, maintain and manage your account, identify and make offers and rewards available to you, facilitate and manage purchase transactions, track and deliver rewards you have earned, and provide support for your account and use of the Services.
- To provide services to Organizations we work with, and to otherwise perform the terms of our agreements with them, including by issuing fundraising payments to them.
- To communicate with you, including in response to your inquiries, and to send you email newsletters, information about offers and other promotional content, and general information about the Services.
- To personalize the Services, including to create a profile of your preferences to personalize and tailor Services content so that it is more likely to be of interest to you, such as by providing personalized and/or more relevant offers from our participating merchants.
- To analyze and improve the effectiveness of the Services and our marketing efforts.
- To provide you with push notifications, communications, and offers for products and services from us, our business partners, and participating merchants, including based on your precise geolocation.
- To perform analytics and conduct customer research.
- To comply with legal or regulatory requirements, judicial process, and our company policies (including due diligence and contracting activities).
- To secure the Services, including by protecting against and responding to fraud, illegal activity (such as incidents of hacking or misuse of the Services), and claims and other liabilities, including by enforcing our Terms of Use.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business, assets or stock.
- For any other purpose that you may authorize or direct at the time we collect your information.

We may also use your personal information to create anonymous or aggregated information that does not and cannot be used to identify you, and use such information for any lawful purpose.

For additional details regarding how we use information collected through certain of our Offerings, please see the **Offering-Specific Details** section of this Privacy Policy.

How We Disclose Your Information

To accomplish the purposes set out above, we may disclose your personal information to third parties that may include:

- Organizations with whom you choose to share rewards that you earn through the Services or to whom you otherwise use the Services to donate funds;
- other users of the Services, if you submit reviews or comments on Givebacks offers to the Services;
- participating merchants, when you purchase or redeem an offer from them, or otherwise interact with them through our Services;

- affiliate partners with whom we work to provide offers to you;
- payment processing and other financial partners we work with to provide the Services and to facilitate your redemption of rewards earned through the Services;
- contractors and service providers we use to support our business and the Services;
- a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business, assets, or stock;
- third parties when, in our sole discretion, it is necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request, or to enforce or apply our terms of use and other agreements, including for billing and collection purposes;
- third parties to whom we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our clients, or others; and
- any other parties with your consent or at your direction, such as when you use any features we make available within the Services to share information about our offers and your purchases through social media platforms.

We may also disclose aggregated information about our users, and information that does not identify any individual, without restriction.

For additional details regarding our practices with respect to the disclosure of information that we collect through certain of our Offerings, please see the **Offering-Specific Details** section of this Privacy Policy.

How We Use Cookies and Other Tracking Technologies

We also collect information about your use of the Services through tracking technologies such as cookies and web beacons. A “cookie” is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. A “Web beacon” is a transparent graphic image placed on a website, email, or advertisement that enables the monitoring of things such as user activity and site traffic.

Some content or applications, including advertisements, on the Services are served by third parties, which may include advertisers, content providers, and analytics and application providers. These third parties may use cookies alone or along with web beacons or other tracking technologies to collect information about you when you use the Services. For instance, we use Google Analytics. Google Analytics uses cookies to help us analyze how visitors use the Service. For more information on Google Analytics, including how Google Analytics collects, uses and discloses information, please refer to the following page:

<https://policies.google.com/technologies/partner-sites>. The information third parties collect through cookies and web beacons may be linked to your personal information, and they may collect information, including personal information, about your online activities over time and across different websites and other online services.

Data Security

We have implemented measures that are designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure, including data access and usage controls and the use of encryption technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We also urge you to be careful about giving out personal information in public areas of the Services. The information you share in public areas may be viewed by any user of the Services.

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 the Services. Any transmission of personal information is at your own risk.

Data Retention

We retain personal and payment data for as long as necessary to fulfill the purposes for which it was collected, including for example, for the time necessary for us to provide the Services, provide you with customer service, answer your queries, resolve technical problems, and comply with applicable legal, regulatory, and contractual obligations. Upon expiration of the retention period, personal information is securely deleted or anonymized to protect individual privacy.

Use of Services by Children

Givebacks does not knowingly collect information from, or provide any of our Services to, children under the age of 16. Nor do we target our Services to children under these ages.

IF YOU ARE UNDER 16 YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS THE SERVICES AT ANY TIME OR IN ANY MANNER.

If you are the parent or legal guardian of a child under 16 who has used the Services and provided personal information to us in violation of this policy, then please contact us at support@givebacks.com to have that child's information deleted.

Your Choices Regarding Your Information

We provide you with choices regarding your personal information.

- You can browse our websites without registering or directly submitting any information to us. You can also choose not to provide your personal information to us directly. If, however, you choose not to provide personal information that we request as part of providing the Services to you, you may be unable to access or use features of the Services, and we may still collect some limited information automatically, as described above.
- You may opt out of receiving our email messages by using the unsubscribe links provided in those messages. You can also manage your communications preferences on your account profile page.
- If you have created an account, you may review, update, or delete certain personal information associated with your account by logging into your account on the Services.
- You can accept or decline cookies. The Services do not currently respond to browser "do not track" signals, so you will need to use your browser settings to effectively manage cookies. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. If you disable or refuse cookies, you may find that certain features or functions will not work as intended.

- You may manage whether and how your mobile device and mobile browser share precise location data with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings. Please note, however, that even if you disable location sharing on your mobile device, we may still collect other location-related information that your device makes available.

Links to Other Websites; Third Party Services

Our Services may contain links to other websites and online services. If you choose to click on an advertisement or another third-party link within the Services, such as to a participating merchant, you may be directed to that third party's website or service. The fact that we link to a third-party website or service is not an endorsement 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 control over third-party websites or services. These other websites or services may place their own cookies or other files on your computer or mobile devices, collect data or solicit personal information from you. Other websites and services 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 and services you use.

Other third parties with whom we work to provide the Services, including networks we work with to provide offers and participating merchants, also have their own Privacy Policies that apply to personal information we share with them in connection with our operation of the Services. We encourage you to familiarize yourself with the Privacy Policies provided by these other parties prior to providing them with information.

To that end, we use PayPal's Hyperwallet service to facilitate the redemption of rewards and remittances of funds to our users and organizations. The Hyperwallet Privacy Policy, available at <https://www.hyperwallet.com/privacy-policy/> applies to PayPal's handling of personal information it collects through the operation of the Hyperwallet Service. You may exercise any rights that you may have with respect to personal information received by Hyperwallet according to the instructions set out in the Hyperwallet Privacy Policy.

International Users

If you are located outside the United States and choose to provide personal information to us, we transfer personal information to and process it in the United States. Your use of the Services and submission of personal information to us represents your agreement to that transfer.

Additional Information for Residents of California

This section applies only to residents of the State of California and generally describes how we collect, use, and disclose the personal information of California residents and their households ("California Personal Information"). However, California Personal Information does not include, and this section does not apply to other personal information excluded or excepted from requirements of the California Consumer Privacy Act of 2018 ("CCPA").

Additionally, this section applies only to the extent we direct the purposes and means of California Personal Information processing and otherwise qualify as a "business" that is subject to the CCPA.

California Personal Information We Collect

We may collect, and may have collected in the preceding 12 months, the following categories of California Personal Information, as described in more detail above in **The Information We Collect and How We Collect It** section of this Privacy Policy:

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, address, telephone number, state identification card number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
- Identifiers such as your real name, alias, postal address, zip code, telephone number, email address, account name, payment card numbers, or other similar identifiers.
- Unique and online identifiers such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device.
- Commercial information that identifies or could reasonably be linked to you, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information identifies or could reasonably be linked to you, such as browsing history, search history and information regarding your interaction with an internet website, application, or advertisement.
- Geolocation information, such as your specific, real-time physical location or precise movements while you access our sites or apps if you have enabled location services on your device.
- Protected classification characteristics under California or federal law, which includes age if 40 years or older, race, color, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information), to the extent you provide this information to us.
- Inferences drawn from personal information, such as person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- Sensitive personal information as defined by applicable law:
 - Precise geolocation
 - Personal information that reveals a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

Retention of California Personal Information

We will retain the California Personal Information we collect and process for as long as required to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to provide the Services, provide you with customer service, answer your queries, or resolve technical problems), unless a longer period is required or permitted by law, such as to fulfill our legal obligations or to establish, protect or defend legal claims.

Sources of California Personal Information We Collect

We collect California Personal Information from the following categories of sources:

- Directly from you. For example, when you submit information to us through forms included on the Websites and within our Offerings.

- Automatically and indirectly from you, such as through logging and analytics tools, cookies, pixel tags, and other automatic data collection.
- From third parties, such as merchants and other business partners, and Organizations that use our Services, and other users of our Offerings.

Purposes for Which We Use California Personal Information

We may collect and use the categories of California Personal Information described in the **California Personal Information We Collect** section above for one or more of the business and commercial purposes described in the **How We Use Your Information** section above.

We do not use or disclose sensitive personal information for purposes other than to customize the Services in ways that would be reasonably expected when you use the Services, including using your precise geolocation, when allow you allow your device to share it with us, to display nearby in-store offers through which you can earn rewards, and nearby Organizations you can support.

Disclosures of California Personal Information for a Business Purpose

We may disclose the categories of California Personal Information that we collect as indicated above to the categories of third parties described in the **How We Share Your Information** section of this Privacy Policy. In the preceding 12 months, we may have disclosed the categories of California Personal Information that we collected, as described above, for a business purpose to the categories of third parties listed in the **How We Share Your Information** section of this Privacy Policy.

Sales and Sharing of California Personal Information

The CCPA regulates the disclosure of California Personal Information in exchange for monetary or other valuable consideration (which the CCPA defines as the “sale” of California Personal Information), as well as the “sharing” of California Personal Information for targeted or cross-context behavioral advertising. We do not “sell” California Personal Information, or “share” California Personal Information for the purpose of enabling targeted or cross-context behavioral advertising, as those terms are defined in the CCPA.

We do not have actual knowledge that we sell the personal information of consumers under the age of 16.

California Personal Information Rights and Choices

The CCPA provides California residents with specific rights regarding their California Personal Information. This section describes those rights and explains how to exercise them.

• Right to Know

- California residents have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your California Personal Information over the past 12 months. If we receive and confirm a verifiable consumer request from you pursuant to the **Exercising California Personal Information Rights** section below, we will disclose to you, depending on the scope of the request:
 - The categories of California Personal Information we collected about you.
 - The categories of sources for the California Personal Information we collected about you.

- Our business or commercial purpose for collecting California Personal Information about you.
 - The categories of third parties with which we share your California Personal Information.
 - The specific pieces of California Personal Information we collected about you.
 - If we sold your California Personal Information, a list of the categories of third parties to whom we disclosed the California Personal Information identifying the categories of California Personal Information sold to those parties in the preceding 12 months.
 - If we disclosed your California Personal Information for a business purpose, a list of the categories of third parties to whom we disclosed California Personal Information for a business purpose identifying the categories of California Personal Information disclosed to those parties in the preceding 12 months.
- **Right to Request Deletion.** California residents have the right to request that we delete California Personal Information, subject to certain exceptions. Once we receive and confirm your verifiable consumer request pursuant to the “Exercising Access, Data Portability, and Deletion Rights” section below, we will delete your California Personal Information from our records, unless an exception applies.
 - **Right to Request Correction.** California Residents can ask us to correct information about them that is inaccurate. We will take into account the nature of the personal information and the purposes of our processing when we address your request.

Exercising California Personal Information Rights

To exercise the rights to know, correct, and delete California Personal Information as described above, please submit a verifiable consumer request to us by either:

- Emailing us at: support@givebacks.com; or
- Submitting a request by mail to: Givebacks, Inc., 4441 Six Forks Road #106, Raleigh, NC 27609

You may designate an authorized agent to submit requests to exercise these rights on your behalf through a signed written permission that authorizes the agent to act on your behalf. We may mandate additional requirements when submitted through an authorized agent, such as requiring you to verify your identity directly with us or to directly confirm the authorized agent’s permission to act on your behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request must provide information sufficient to permit us to reasonably verify you are the person about whom we collected California Personal Information, or an authorized agent of that person. In order to verify your request, we may require you to provide additional information, including account profile information such as your email address and other information elements necessary to verify your identity. Your request also must include sufficient detail for us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with California Personal Information if we cannot verify your identity or authority to make the request and confirm the California Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, if you have a password-protected account with us we consider requests made through that account sufficiently verified when the request relates to California Personal Information associated with that specific account.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision, and we reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

Non-Discrimination

You have the right to not receive discriminatory treatment for exercising your access, data portability, opt-out, and deletion rights described above.

Notice of Financial Incentive

When you use the Services, you may receive discounts, rewards, cash back, price or service differences, or other financial benefits. Because we ask you to provide, and we may share with third parties with whom we work, your California Personal Information in order to enable you to receive these benefits, including information about your shopping and rewards information, your browsing activity information, transactions through the Card-Linked Offer Program, and other information we receive from participating merchants and other business partners, the Services may be considered to involve a “financial incentive” under the CCPA.

You can opt into the financial incentive or price or service difference by installing and using our Givebacks Rewards browser extension or mobile application, participating in the Card-Linked Offers Program, or otherwise submitting your California Personal Information to us. If you subsequently wish to withdraw from the financial incentive or price or service difference, you can stop the collection of information by our mobile applications and/or browser extensions and/or opt out of the Card-Linked Offers Program by taking the steps described in the **Card-Linked Offers Program** and/or **Givebacks Rewards Browser Extension** section of this Privacy Policy, or contact us at support@givebacks.com.

Each financial incentive or price or service difference related to the collection and disclosure of California Personal Information is based upon our reasonable determination of the estimated value of such information, which is inherently variable and depends on your purchasing and reward redemption activity. We estimate, however, that the value of the personal information we collect from each program participant is equivalent to the expenses related to our providing the program and related benefits to you, including the cost of any discounts, rewards, cash back, price or service differences, or other financial benefits. The estimated value takes into consideration, without limitation, estimates regarding the anticipated revenue generated from such information, the anticipated expenses which might be incurred in the collection, storage, and use of such information in the operation of our business, and other relevant factors related to the estimated value of such information to our business, as permitted under the CCPA.

Shine the Light

California’s “Shine the Light” law, S.B. 27, California Civil Code Section 1798.83, permits California residents who have an established business relationship with us to request certain information regarding our disclosures of their personal information (as defined by that law) during the preceding year, if any, to third parties for those parties’ own direct marketing purposes. If you are a California resident who has an established business relationship with us and wish to exercise your rights under that law, please send your written request by mail to Givebacks, Inc., 4441 Six Forks Road #106, Raleigh, NC 27609.

Additional Disclosures for Residents of Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia

Sensitive Personal Information Collection

Some of the information we collect may be defined as sensitive under Colorado, Connecticut, Delaware, Iowa,

Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia privacy laws. Such information includes precise geolocation and personal information that reveals a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

Privacy Rights

Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Utah, Tennessee, Texas, Utah, and Virginia privacy laws may provide residents of those states with additional rights regarding our use of their personal information subject to those laws. We have described such privacy rights below as applicable.

As the rights described below are provided by law, there may be limitations or exceptions that apply to your request in accordance with applicable legal requirements. We have described these rights generally, without noting all applicable or potentially applicable limitations or exceptions. When you make a request, we may provide more detailed information regarding any legal requirements applicable to your request and whether any exception or limitation applies.

Subject to certain limitations and exceptions, Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia provide residents of those states with rights to:

- Confirm whether we process their personal information.
- Access personal information we have collected about them.
- Delete personal information.
- Receive a copy of their personal information in a portable and, to the extent technically feasible, readily-usable format.

Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia also provide their states' residents with a right to correct inaccuracies in their personal information, taking into account the information's nature and purposes for processing.

To exercise any of these rights, please contact us using a method described in the "Contacting Us" section below and clearly identify the exercise of one of your privacy rights as the reason you are contacting us.

To appeal a decision regarding a request to exercise these rights, please describe the issue and request an appeal by responding to the communication of our decision or otherwise contacting us as described in the "Contacting Us" section below.

Additional Privacy Rights for Residents of Delaware, Minnesota, and Oregon

If you are a Delaware, Minnesota, or Oregon resident, you may also have the right to obtain information regarding the identities of certain third parties to whom we have disclosed personal information.

To exercise this right, please contact us either using a method described in the "Contacting Us" section below and clearly identifying the exercise of your Delaware, Minnesota, or Oregon privacy rights, as applicable to you, as the reason you are contacting us. To appeal a decision regarding a request to exercise this right, please describe the issue and request an appeal by responding to the communication of our decision or otherwise contacting us as described in the "Contacting Us" section below.

Additional Disclosures for Residents of Minnesota

We store personal information of Minnesota residents for as long as we reasonably need it to fulfill the purposes for which it was collected, including provision of the Services and to comply with law, resolve disputes, and enforce our agreements, as applicable.

Deidentified Data

We will maintain and use deidentified information, that does not constitute personal information, in deidentified form and will not attempt to reidentify such deidentified information except to the extent permitted under applicable law. We process personal information as described in this Policy.

Offering-Specific Details

Givebacks for School Districts

Givebacks provides certain Offerings to K-12 school districts that allow schools to manage and administer fundraising and payments.

In some cases, we receive information from K-12 schools and districts relating to students. Our use and disclosure of that student information is governed by our agreements with school districts, which generally limit our use of the information to providing our Services to the schools and districts and other specified purposes as permitted by applicable law.

If you are the parent or guardian of a student who attends a school that uses the Services, we may ask you to create a profile and submit certain personal information such as your name; phone number; email address; mailing address; other biographical information you choose to provide; information about your children and other family members, such as their names, genders, classroom, and relationship with you; and credentials such as a username and password to enable you to access the Offerings (collectively, "Parent Information"). We use and disclose Parent Information to provide the Services to the K-12 school or district, to facilitate your use of the Services, to communicate with you about the Services, to improve the Services and develop new Services, and to fulfill our obligations under our agreement(s) with the school or district. We will not otherwise use or disclose Parent Information that we collect as part of the Services we provide to K-12 school districts unless you choose to make use of other Offerings we provide, in which case the information will be used as described in this Privacy Policy with respect to those other Offerings.

Givebacks for Nonprofits

Givebacks provides certain Offerings to nonprofit organizations such as Parent Teacher Associations, Parent Teacher Organizations, and booster clubs that enable those organizations to manage and communicate with their members, supporters, and volunteers.

When you use those Offerings as a member, supporter, or volunteer of one of these Organizations, we may ask you to create a profile and submit certain personal information such as your name; phone number; email address; mailing address; other biographical information you choose to provide; your profile photograph; information about your children and other family members, such as their names, genders, classroom, and relationship with you; and credentials such as a username and password to enable you to access the Services (collectively, "Profile Information").

We use Profile Information to provide the Services to your Organization, to facilitate your use of the Services, to communicate with you about the Services, to improve the Services and develop new Services, and to fulfill our obligations under our agreement(s) with your Organization. Your Organization may also use Profile Information to communicate with you, including by sending you emails through our Services.

We will also collect documents, files, text, data, graphics, images, photos, video or other audiovisual content, including personal information, that you choose to upload, transmit, publish, and otherwise display through the Services (collectively, "User Content").

We use User Content to provide the Services, to improve the Services and develop new Services, and to fulfill our obligations under our agreement(s) with your organization.

Your Profile Information and any User Content that you choose to upload, transmit, publish, and otherwise display through the Services may be shared with your Organization and any Givebacks users associated with your Organization. By default, your Profile Information will be shared with all other Registered Users associated with your Organization. In particular, your children's names (if provided) are always visible to Registered Users associated with your Organization. The other parties with whom your User Content is shared depends on the context in which you share it. If you choose, User Content can be shared with, and will be visible to, all users associated with your Organization. Other User Content (such as messages between you and another individual Organization member) may be visible only to a subset of your Organization, such as other parents in your child's class or other members of "hubs" within your Organization, such as committees or boards.

Your User Content is posted on and transmitted to others in your Organization at your own risk. We cannot control the actions of other users of the Services with whom you may choose to share your User Content, and therefore we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

Givebacks Rewards Browser Extension

When you install the Givebacks Rewards browser extension, in addition to collecting the shopping and rewards information described above, we will automatically track all websites you visit using the browser for which you have installed the extension, and your activity on those websites, including participating merchants, products, services, and offers you searched for, viewed, or clicked; the websites you visit and your browsing activity on those sites; and transaction information related to our Services, including purchase confirmation data and rewards accrued through the Services.

We may disclose the information we track and collect to third parties, including networks we work with to provide offers and participating merchants. By installing and using the Givebacks Rewards browser extension, you evidence your intent to interact with those networks and those participating merchants, and thereby authorize and direct us to disclose the information we collect and track to provide the Givebacks Rewards Browser Extension features and functionality.

You can stop all collection and disclosure of information through the Givebacks Rewards Browser Extension by uninstalling the browser extension. In some instances, you can opt out of certain data collection by updating your Settings within the browser extension or your mobile device settings.

Card-Linked Offers Program

If you elect to participate in our Card-Linked Offers Program and link an eligible debit or credit card to your account, Givebacks and our third party service providers will collect personal information and transaction data which may include your contact details, eligible debit or credit card details, and the transaction details for qualifying purchases of goods and services at participating merchants from your eligible debit or credit card network (e.g., Visa, Mastercard, American Express), and from other partners we work with that operate card-linked offer networks, including Rakuten Card Linked Offer Network, Inc. and Rewards Network Establishment Services, Inc. The information we receive will include transaction details for purchases you make using the linked eligible debit or credit card, including participating merchant name, participating merchant location or other store identifier, transaction date, and transaction amount. Notwithstanding anything to the contrary in the Terms of Service or this Privacy Policy, Givebacks and its Third Party Service Providers (including Rakuten Card Linked Offer Network, Inc. and Rewards Network Establishment Services, Inc.) will use and share transaction information in connection with the Card Linked Offers Program as follows:

- Use transaction data to confirm a qualifying purchase or return to match transactions to confirm whether you qualify for a statement credit or an Offer;
- Share transaction data with the participating merchant where a transaction occurred as needed for the merchant to confirm a specific transaction occurred or points should be awarded; for example, the date and amount of your purchase and the last 4 digits of your card number so the merchant can verify your purchase with its records if there is a missing or disputed transaction;
- Provide participating merchants or third party service providers aggregated and anonymized information relating specifically to registered card activity solely to allow participating merchants and third party service providers to assess the results of their campaign;
- Use anonymized and aggregated transaction data to conduct analysis for the improvement and optimization of the Card Linked Offers Program; and
- Provide information in order to respond to a request from government authority or a payment organization involved in a transaction with you or a merchant.

By participating in the Card Linked Offers Program, you evidence your intent to interact with the third party service providers, applicable payment card networks and applicable participating merchants, and thereby authorize and direct us to perform the disclosure, exchange and use of transaction data described above and herein by and among Givebacks and those third party service providers, applicable payment card networks and applicable participating merchants.

By registering a payment card in connection with transaction monitoring, you intentionally authorize, use, and direct Givebacks and its third party service providers to disclose your payment card information with Mastercard, Visa and American Express. You authorize Mastercard, Visa and American Express to monitor transactions on your registered card(s) to identify qualifying purchases in order to determine whether you have qualified for or earned an offer linked to your payment card, and for Mastercard, Visa and American Express to share such transaction details with Givebacks and its third party service providers to enable your card-linked offer(s).

You may opt-out of transaction monitoring on the payment card(s) you have registered, and your participation in the Card-Linked Offers Program with respect to such card(s), by logging into your Givebacks account and clicking "Manage Connected Cards," selecting the card for which you wish to opt-out, and clicking "Remove This Card." You must repeat this process for every card for which you wish to opt out of transaction monitoring.

Contacting Us

If you have any questions about these privacy policies or information practices, please contact us by email at support@givebacks.com, by mail at Givebacks, Inc., 4441 Six Forks Road #106, Raleigh, NC 27609, or by telephone at (919)589-3076.

Changes to this Privacy Policy

We reserve the right to change the terms of this Privacy Policy at any time. When we change the Privacy Policy, we will update the "Last Updated Date" above and post the modification on our website. Your continued use of the Services following the posting of changes to this Privacy Policy means you accept those changes.