

## The Solomon Foundation Privacy Policy

**Last Updated: June 26, 2018**

The Solomon Foundation (the “**Foundation**,” “**we**,” “**us**,” or “**our**”) recognizes the importance of keeping information about you secure and confidential. We want you to understand what information we collect about or from you. This Privacy Policy describes the information collected through this website and the online services we provide (together, the “**Services**”), including our investment and loan services, and how that information is used and shared. The Foundation and its suppliers may collect or receive the types of information described below in connection with your access to and use of the Services (together, “**Collected Information**”). This Privacy Policy applies to all users of the Services, including our investment clients and borrowers.

**By accessing or using the Services or by entering into any agreement with the Foundation that references this Privacy Policy, you agree on behalf of yourself and any organization that you represent (together, “you”) that you have read and understand this Privacy Policy. If you do not agree with this Privacy Policy, do not access or use the Services.**

### **Revisions to this Privacy Policy:**

The Foundation reserves the right to revise this Privacy Policy at any time in its sole discretion. In the event of any such revisions, the revised version of this Privacy Policy will be posted on the Services and, by accessing or using the Services after the revised Privacy Policy is posted, you agree to those revisions. Material changes will be conspicuously posted on the Services or otherwise communicated to you. Users should review this Privacy Policy from time to time.

### **What Information the Foundation Collects and How the Foundation Collects It:**

The information that we may collect from or about you broadly falls into the following categories:

- Information that you voluntarily provide to us, for example, your contact information and payment information.
- Information that we collect through your use of the Services, for example, data collected by the servers used to operate the Services (e.g., IP addresses), data collected by cookies, and data collected by analytics services.

### **We Collect Personal Information and Other Information that You Submit:**

*Personal Information.* You can visit our websites without providing us with your personal information, but you will be required to provide personal information in order to request or sign up for an investment account or to submit a loan application via the Services and to use certain other features of the Services. We will collect any personal information from or about you that you choose to provide to us, which may include your name, physical address, email address, telephone number, and payment information. For example, you must provide personal information to the Foundation when you request or sign up for an online account, to request a copy of our offering circular and financial statements, to submit an organization or individual purchase application, to submit a loan application, when making an investment, when submitting information requests, and when responding to communications from us (e.g., surveys, promotional offers, registration confirmations).

We will use personal information as described below, including to set up and administer your accounts and to provide you with information and communications that you request or that we believe are relevant or may be of interest to you, subject in each case to applicable laws and the terms of this Privacy Policy. If you provide your mobile or other telephone number to us, you consent to receiving telephone calls from us at that telephone number as described below.

*Investment Purchase Application and Transaction Information.* We will collect all information you provide in the course of applying for an organization or individual investment purchase, including your Tax ID, Social Security number, driver’s license number, and birthdate (as applicable), as well as information about the particular investment. We will also collect all information you provide in the course of using the Services, including the information required by our online forms.

*Loan Application Information.* We will collect all information and documents you provide in the course of applying for a loan or line of credit, including financial statements, tax returns, pay statements,

insurance information, and any personal information that you submit for purposes of allowing us to pull and review your credit history.

*Financial Information.* Invested funds must be transferred by check or ACH. When transmitting funds through the Services, all payment information (e.g., bank account numbers) is provided directly to our PCI-compliant third-party payment processor. If you submit payment via ACH, you will need to submit the name of your bank and your bank account number and routing number. The Foundation stores this information in its accounting software to assist its payment processor with recurring payments. We will maintain a record of the transactions you make using the Services.

*Event Registration Fees and Related Information.* Event registration fees must be made by credit or debit card or via PayPal. All credit and debit card information is provided directly to our PCI-compliant third-party payment processor. The Foundation does not directly access, handle, or store your credit or debit card information. To submit payment you will need to submit your name and your credit or debit card type, number, expiration date, security code, and billing address. Payment by credit or debit card is subject to the approval of the card issuer. We will not be liable in any way if a card issuer refuses to accept a credit or debit card for any reason. If you submit payment using PayPal, you may need to log in to your PayPal account and PayPal may use Collected Information as described in its [PayPal's Privacy Policy](#). We will collect all information you provide in the course of registering for an event using the Services, including preferred travel dates and other travel arrangements, traveler numbers, your age, and travel-related preferences, such as meal preferences, hotel room preferences, and special accommodations. We will maintain a record of the events you register for using the Services.

*Account Information.* To request or create an online Foundation account for either investment or loan application purposes, you will need to provide us with your name, email address, and Social Security number.

*Mailing List Information.* If you sign up or otherwise opt in to receive blog updates or promotions from us, you will need to submit your name, email address, and/or physical address. We will use this information to provide you with promotional and other electronic and hard copy communications. You may opt out of receiving promotional emails from us at any time by following the unsubscribe instructions contained in the applicable email. We may use third-party email providers to deliver these communications to you.

### **Other Information We Collect:**

*IP Addresses and Related Data.* The servers used to operate and provide the Services may collect data pertaining to you and the equipment, software, and communication methods you use to access the Internet and the Services, including Internet protocol (IP) addresses assigned to the computers and other devices from where you access the Internet, your Internet service provider (ISP), your device ID number, your approximate geographic location, your browser type, the pages you access on the Services, the websites you access before and after visiting the Services, the length of time you spend on the Services, date and time stamps, and clickstream data. The Foundation may use this information to administer the Services and its servers, to generate statistical information, to monitor and analyze Services traffic and usage patterns, to monitor and prevent fraud, to investigate complaints and violations of our policies, and to improve the Services' content and the products, services, materials, and other content that we describe or make available through the Services. We may combine this information with other Collected Information (including personal information) and information obtained from third parties for the purposes discussed in this Privacy Policy. The suppliers that we use to provide the Services may collect information about your visits to the Services and other websites. Some of this information may be collected using cookies and similar tracking technologies as explained further below under "Cookies."

*Location Information.* In addition to the approximate geographic location information collected as discussed above, we may, with your consent, access more specific location information to enhance the user experience and increase the usefulness of the Services. This includes both geographical location information that you input using the Services (e.g., when you enter your physical address) and, as applicable, geographical location information collected by device-based location services (including GPS data). You may choose to allow us to access your location by granting the Services access to your location when prompted or through your device's location services settings.

*Cookies.* The Services automatically uses cookies to track your use of the Services in order to facilitate and enhance the user experience on the Services and for other purposes as described in this Privacy Policy. "Cookies" are small pieces of information that are stored on your device's hard drive by your browser. The Services may use both cookies that we implement and cookies implemented by our suppliers and other third parties. We use cookies to track how you access and use the Services, to

learn when and how users visit the Services, to learn how popular Services pages are and aren't, to learn which search terms are used to find the Services, and to learn which websites direct you to the Services. We also use cookies to help display certain information on the Services and to improve your enjoyment of the Services, for example, by remembering your contact and other information when you access or use the Services. Most browsers automatically accept cookies. You can disable this function, but disabling cookies may impact your use and enjoyment of the Services. Our Services suppliers may use cookies and other tracking technologies, such as pixel tags, to track Services visitors across the Internet to understand how you get to the Services. We do not have access or control over these cookies and this Privacy Policy does not cover the use of third-party cookies. Due to this automatic collection of data using cookies, we do not honor "do not track" requests.

*Advertising Networks, Personalized Advertising, Remarketing, and Retargeting.* From time to time the Services may use or participate in advertising networks and related advertising services that are managed and provided by third-party advertising servers, advertising agencies, technology vendors, and research firms, including advertising retargeting services provided by Facebook (sometimes referred to as Facebook Pixel or the Facebook "tracking pixel"). These services collect information about your visits to and interactions with the Services and other websites and will use that information to target advertisements for goods and services. The information collected may be associated with your personal information. These targeted advertisements may appear on the Services or on other websites. Advertising networks often gather data about consumers who view advertisements to make inferences about a consumer's interests and preferences, which enables their computers to deliver advertisements directly targeted to the consumer's specific interests. This practice is often referred to as "online behavioral advertising." For example, a third-party advertising network might collect the type of Internet browser you use, the type of computer operating system you use, the domain name of a website you visit, whether or not you visit specific pages of the Services and other websites, the location of your Internet service provider, the date and time of a visit to a website, and other interactions between you and a website.

If you have a Facebook account but do not wish Facebook to collect data relating to you via the Services, we suggest that you: (a) hide social media platform plug-ins using an ad blocker; (b) always log off completely from Facebook before visiting other websites and delete all related cookies; and, (c) where the option is available, disable the advertising services and networks operated by Facebook.

**To change your preferences with respect to certain online ads and to obtain more information about third-party ad networks and online behavioral advertising, please visit the [National Advertising Initiative Consumer opt-out page](#) or the [Digital Advertising Alliance Self-Regulatory Program](#).** Please remember that changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads from time to time.

*The Foundation's Social Media Pages.* The Foundation is active on social media, including Facebook. You may have the opportunity to comment on those social media platforms regarding the Foundation and the products and services we offer. The Foundation reserves the right to post on its websites and social media pages any comments or content that you post on our social media pages.

*Embedded Content.* The Services may incorporate content, including feeds scripts embedded in the Services' code and visible content (for example, videos), provided by third parties. In some cases, those third parties collect data about how you interact with their content. For example, YouTube may collect or otherwise have access to usage data on videos embedded on the Services as described in [YouTube's Privacy Policy](#).

### **How We Use and Share Collected Information:**

In addition to the uses described above, the Foundation and its suppliers may use and disclose Collected Information as described below. The Foundation will not use, sell, rent, provide, or otherwise disclose Collected Information except as stated in this Privacy Policy and as permitted by applicable law.

*Purpose Collected & Communication With You.* We will use and share your personal information and other Collected Information for the purpose for which it was collected, for example, to provide the Services, to respond to your requests, to administer the Services, to administer and communicate with you in connection with your account (including to process your investment transactions and to provide you with account statements), and to provide you with information and communications that you request. We will use location information to understand where users of our Services are located. We may use Collected Information to notify you of changes made to the Services (for example, changes to this Privacy Policy), and to provide you with promotional materials and other communications as

described above. If you provide us with your telephone number, we may call you at that telephone number in response to your questions or comments. If you contact us for support or assistance in using the Services, we may use Collected Information to determine whether or not your system meets the minimum requirements needed to access and use the Services and otherwise to contact you regarding your request. You may opt out of receiving promotional emails from us at any time by following the unsubscribe instructions contained in the applicable email or by contacting us using the contact information provided below under "Contact Us."

*Third-Party Suppliers and Consultants.* We may disclose your personal information and other Collected Information to our third-party service providers, suppliers, consultants, agents, distributors, representatives, and partners (including Services management and hosting suppliers, identity verification service providers, accounting and customer management software providers, travel agents, marketing and public relations service providers, and email service suppliers) that provide data processing services to us (e.g., to support the delivery of, provide functionality on, or help to enhance the security of the Service or our websites, services, or products) or that otherwise process personal information for purposes that are described in this Privacy Policy or communicated to you when we collect your personal information. Our suppliers are authorized to and may use and disclose Collected Information as necessary for them to provide the applicable services to us and as provided by their own privacy policies as noted above.

*Sharing Collected Information with Other Third Parties.* We may share Collected Information with third parties that have products or services that we think may be of interest to you. You may opt out of receiving communications from any such third party pursuant to such third party's policies. We do not control any third party or their policies.

*Evaluation and Improvement of the Services, User Demographics, and Aggregation.* We may use and disclose Collected Information: to analyze, develop, and improve the content, materials, products, and services that we make available (including the Services); to inform marketing and communication plans and strategies; and to evaluate Services user needs and customize Services content, promotional emails, and your browsing experience. We may also aggregate personal information and other Collected Information to create aggregate data on Services users that describes users as a group but does not reveal the identity of individual users. We may use aggregate data to understand Services users' needs, to determine Services user demographics and usage patterns, to determine what kinds of products and services we can provide, and to improve and enrich our products, our services, and the Services.

Relatedly, we may provide aggregate information about our clients, Services users, Services traffic patterns, and related information to third parties. We may also combine Collected Information with other information in our possession, such as information pertaining to your account(s) with the Foundation, for purposes of using information as described in this Privacy Policy.

*Compliance with the Legal Process, Security, and Protection of Rights.* The Foundation may use Collected Information and share it with third parties to the extent permitted by applicable law if the Foundation believes that such action is necessary or appropriate to (1) comply with the law or with any legal process (e.g., a subpoena, court order, or law enforcement request); (2) protect and defend its rights and property or the rights or property of any other person; (3) protect against misuse or unauthorized use of the Services; or (4) protect the personal safety, property or rights of users of the Services or the public, including disclosing information necessary to identify, contact, or bring legal action in the event of a violation of our contracts, terms, or policies.

*Business Transfers.* We may choose to buy or sell assets from time to time. We may share Collected Information in connection with the evaluation of those transactions. We may transfer Collected Information if we enter into those transactions. Also, if we (or our assets) are acquired or if we go out of business, enter bankruptcy, or go through some other change of control or reorganization, personal information and other Collected Information could be one of the assets transferred to or acquired by a third party.

*With Your Consent.* With your consent, we may share your personal information in ways not specifically described in this Privacy Policy.

### **Third-Party Websites:**

The Services may contain links to or be linked to websites that are not operated, maintained, or controlled by the Foundation. The Foundation is not responsible for and makes no representations about the privacy policies or practices of any third parties or any third-party websites. This Privacy Policy does not apply to any third-party websites or to any personal or other information that you may

provide to third parties. You should reach the applicable privacy policies for each website that you visit.

### **International Transfers of Your Personal Information:**

In operating the Service, your personal information may be transferred to, stored in, and processed in countries other than the country in which you are resident. Those countries may have data protection laws that are different from those of your country and, in some cases, may not be as protective. Specifically, our website servers and some of our service providers are located in the United States and our third-party service providers and partners operate around the world. This means that when we collect your personal information we may process it in other countries. The Foundation has, however, taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

### **Information Security:**

The Foundation does not guarantee that loss, misuse, or alteration of Collected Information will not occur, but the Foundation uses administrative, technical, personnel and physical measures to help safeguard personal information against loss, theft and unauthorized use, disclosure and modification. However, no security system is impenetrable and the storage and communication of information can never be completely secure. The Foundation cannot guarantee that the information you supply or the communications you submit will be completely secure or will not be intercepted while being transmitted over the Internet.

As stated above the Foundation cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Therefore, you should take every precaution available to you to assist in maintaining email security on your system, including, but not limited to:

- Being cautious of fraudulent messages sent from an email address that may pose as the Foundation inviting you to respond or click on a link to provide personal information;
- Installing and frequently updating proven anti-virus, spyware, and personal firewall software to help protect against viruses, spyware, and unauthorized access to your computer;
- Only accepting or downloading software from trusted sources and never accepting files or attachments when accessing websites unless you are confident of their authenticity; and
- If you are using a broadband or other high-speed Internet connection, disable all file sharing applications on your computer.

If you become aware of any breach of Services security or this Privacy Policy, please notify us at [info@thesolomonfoundation.org](mailto:info@thesolomonfoundation.org) immediately. If our security system is breached, we will notify you of the breach only if and to the extent required under applicable law.

### **How Long We Retain Your Personal Information:**

We will retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law (e.g., tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if that is not possible (e.g., because your personal information has been stored in back-up archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

For personal information that we process on behalf of our clients, we will retain that personal information in accordance with the terms of our agreement with them, subject to applicable law.

### **Correcting and Accessing Your Personal Information:**

To access, update, or request a correction to your personal information as it exists in our records, please visit your Services account or contact us using the contact information below.

### **Access by Children:**

The Services are not directed at children under 13 years of age. The Foundation does not knowingly collect or use information from individuals under 13 years of age.

### **Contact Us:**

If you have any questions or concerns regarding this Privacy Policy, contact us by email at [contact@thesolomonfoundation.org](mailto:contact@thesolomonfoundation.org), by phone at 855-873-5873, or by mail at 16965 Pine Lane, Suite 200, Parker, Colorado 80134.