

## The Solomon Foundation Online Privacy Policy

**Last Updated: July 15, 2024**

The Solomon Foundation (the “**Foundation**,” “**we**,” “**us**,” or “**our**”) recognizes the importance of keeping information about you secure and confidential. This Privacy Policy describes the information that identifies you or can be used to reasonably identify you (“**Personal Information**”) collected through our website [www.thesolomonfoundation.org](http://www.thesolomonfoundation.org) and online services we provide (together, the “**Services**”), and how that Personal Information is used and disclosed. The Foundation and its service providers may collect or receive the types of Personal Information described below in connection with your access to and use of the Services. 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 acknowledge on behalf of yourself and any organization that you represent (together, “you”) that you have read and understand this Privacy Policy. If you have not read or understood 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. Material changes will be conspicuously posted on the Services or otherwise communicated to you. By accessing or using the Services after the revised Privacy Policy and notice of the same is posted, you agree to those revisions.

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

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

- Personal Information that you voluntarily provide to us, for example, your contact information.
- Personal Information that is provided by third parties.
- Personal 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.

Certain Personal Information that we collect may also be nonpublic personal information under the Gramm-Leach-Bliley Act (GLBA) and subject to the protections and limitations of GLBA. See our [GLBA Privacy Notice](#) for further information on our GLBA privacy practices.

In addition, we may collect statistical data from our Services and use of the same that is not identifiable and therefore not subject to this Policy.



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**We Collect Personal Information that You Submit:**

*Personal Information.* You are required to provide Personal Information in order to use certain features of the Services, such as to request or sign up for an investment account or to submit a loan application via 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, and telephone number.

*Investment Purchase Application and Transaction Information.* We will collect all Personal Information you provide in the course of applying for or making an organization or individual investment or purchase, including your Tax ID, Social Security Number, copy of your driver's license and driver's license number, and birthdate (as applicable), as well as information about the particular investment. We will also collect all Personal 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 Personal 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. 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. 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 via PayPal. If you submit payment using PayPal, you may need to log in to your PayPal account and PayPal may use Personal Information as described in [PayPal's Privacy Policy](#). We will collect all Personal 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.

*Online Account Information.* To request an online Foundation account, you will need to contact us via phone and provide us with Personal Information consisting of your name and answer your established security questions. We will use the email address on file to send you temporary account credentials upon approval of your request, which temporary credentials you should promptly change for security purposes.

*Mailing List Information.* We may use your 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 or by contacting us as set forth below. Opting out of promotional communications does not opt you out of communications related to your accounts or transactions. We may use third-party email providers to deliver these communications to you.

*Requests and Communications.* If you request information or otherwise communicate with us, such as requesting our offering circular or financial statements, submitting any inquiries, or



participating in surveys or promotional offers, we will collect Personal Information to document and respond to your request or communication.

*Online Donations and Purchases* . When you make a donation or online merchandise purchase, you will be redirected to PayPal, Inc.'s website, where you will be prompted to insert contact and payment information. The Foundation will not receive your full payment information, but will receive your name, address, amount of donation or purchase, and if you made a purchase, shipping and other order information to be able to process the same.

*Job Application Information*. If you apply for a job on our website or otherwise send us your resume or other job application information, we will use that information to assess your qualifications for a career with the Foundation pursuant to this Policy.

*Feedback*. When you provide comments or feedback about our Services or the content on or available via the Services will not treat feedback as confidential, and we may use that feedback for any purpose in our sole discretion so long as it does not personally identify you. Feedback will be used without attribution or compensation to you.

*Business Contacts*. When a business or organization contracts with us directly we may collect the business contact information of those involved. The processing of any information provided in such a business context is governed by the contracts between that business and the Foundation.

#### **We Collect Information From Third Parties:**

We may obtain data about individuals from various third-party companies and public sources. We may run background checks or credit checks with third party vendors to obtain additional information about you in order to meet our obligations to know our customers and otherwise enhance security and attempt to prevent fraudulent or unlawful transactions. We may also collect information about you from third parties to enhance our existing data about our users in order to improve our ability to contact you, enhance our product or service lines, and otherwise enhance our outreach and marketing capabilities. We may combine this data with other Personal Information and retain it for our files. .

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

*IP Addresses and Related Data*. The servers used to operate and provide the Services may collect Personal Information 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 Personal 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 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 Personal 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.* We may collect approximate geographic location information collected as discussed above. 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).

*Tracking Technologies.* The Services automatically uses cookies and other tracking technologies (“Tracking Technologies”) 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. The Services may use both Tracking Technologies that we implement and Tracking Technologies implemented by our suppliers and other third parties. We use Tracking Technologies 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 Tracking Technologies 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 Tracking Technologies. You can disable this function for some Tracking Technologies, but disabling some Tracking Technologies may impact your use and enjoyment of the Services. Our Services suppliers may use 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 third-party Tracking Technologies and this Privacy Policy does not cover such third-party use of Tracking Technologies. **Due to this automatic collection of data, we do not honor “do not track” requests.**

*Advertising Networks, Personalized Advertising, Remarketing, and Retargeting.* 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 that may be considered Personal Information and will use that information to target advertisements for goods and services. The information collected may also be associated with other Personal Information we have and maintain. These targeted advertisements may appear on the Services or on other websites and platforms, such as Facebook. 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 learn more about Facebook's Privacy Policy, including their services and your rights, please click here <https://www.facebook.com/privacy/explanation>.

**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.

*Social Media.* The Foundation is active on social media, including Facebook, LinkedIn, and Instagram. 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 social media platforms.

*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.

#### **How We Use and Disclose Personal Information:**

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

*Purpose Collected & Communication With You.* We will use and disclose your Personal 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 Personal 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



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support or assistance in using the Services, we may use Personal 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.”

*Text Messages.* You may also elect to receive text messages from us. When you sign up to receive SMS text messages, we will send you information about the Foundation and our services, as well as promotional offers and more. To the extent you voluntarily opt-in to receive SMS notifications sent directly to your mobile phone number, we receive and store the information you provide, including your telephone number or when you read a text message. This information is sent to and maintained by our third-party service provider for text messages, CallFire. CallFire’s services privacy policy is available [here](#). You may opt out of receiving text messages at any time by replying “STOP”. See our [Terms of Use](#) for additional information regarding text messages. Please note that even if you opt out of receiving future text-based or email marketing communications from us, we may still contact you about your account, engage with you in general advertising practices, and respond to your inquiries or requests for information.

*Third-Party Suppliers and Service Providers.* We may disclose your Personal 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 Personal Information as necessary for them to provide the applicable services to us and for certain of these providers, as provided by their own privacy policies as noted above.

*Disclosing Personal Information with Other Third Parties.* We may disclose Personal 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 Personal 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 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 and disclose aggregate data without restriction. We may also combine Personal 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 Personal Information and disclose 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 disclose Personal Information in connection with the evaluation of those transactions. We may transfer Personal 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 Personal Information could be one of the assets transferred to or acquired by a third party.

*With Your Consent.* With your consent, we may disclose 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:**

Our Services are provided in the United States and are targeted to the United States. If you elect to access any Services from outside the United States, 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.

#### **Information Security:**

The Foundation does not guarantee that loss, misuse, or alteration of Personal Information will not occur, but the Foundation uses administrative, technical, 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 Personal Information you supply or the communications you submit will be completely secure or



will not be intercepted while being transmitted over the Internet. Therefore, you should take every precaution available to you to assist in maintaining 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.

**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).

For Personal Information that we process on behalf of our institutional 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 online account or contact us using the contact information below.

**Access by Children:**

The Services are not directed at children under 18 years of age. The Foundation does not knowingly collect or use information from individuals under 18 years of age.

**Contact Us:**

If you have any questions or concerns regarding this Privacy Policy, contact us by email at [info@thesolomonfoundation.org](mailto:info@thesolomonfoundation.org), by phone at 855-873-5873, or by mail at 16995 Pine Lane, Parker, Colorado 80134.



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