

# Privacy Policy

(Effective 01/01/2020)

Charitable Management Systems, Inc. (“CMS,” “we,” “us”) respects your individual privacy. This Privacy Policy puts you in control of how your personal information is used in connection with information we collect. This Privacy Policy describes how we collect, use, and share personal and non-personal information we obtain from you regarding programs that are administered by CMS.

This is the Privacy Policy for Charitable Management Systems, Inc.

Charitable Management Systems, Inc.  
552 S Washington Street  
Suite 202  
Naperville, IL 60540

We can be reached by writing us at the above address, contacted by phone at 630.428.2412 or by fax at 630.428.2695.

## What we collect

We may collect the following information:

- (i) "Personal Information" – that is, information such as your full name, email address, mailing address, telephone number, and date of birth/age;
- (ii) "Non-Personal Information" – that is, information about you or your activities through which you cannot be personally identified;
- (iii) "Application Information" – that is, information related to a scholarship application, which includes both Personal Information and Non-Personal Information of scholarship applicants, their parents/legal guardians, school officials, and others; and/or
- (iv) Information related to customer surveys, promotions, and/or offers which may be Personal Information and/or Non-Personal Information (e.g., preferences, demographics, interests, etc.).

In situations where it is possible to do so, Non-Personal Information (as well as publicly available information) may be linked to Personal Information.

## How we gather information

We may collect Personal and Non-Personal information through both electronic and non-electronic forms and documents that you submit to us. These forms may be available to download on websites or assessable by establishing a User Account. These websites may be operated by CMS or by companies and organizations offering scholarship programs (“Sponsors”) administered by CMS. Websites offered by Sponsors will be governed by their own Privacy Policies. We encourage you to review the Privacy Policy for each website that you visit. With your consent, we may also gather information from third parties such as educational institutions.

## What we do with the information we gather

We require the information that we gather for various reasons including the following: (i) to administer and conduct scholarship programs (e.g., to identify potential scholarship recipients and to provide scholarship-related services); (ii) to understand your needs, provide you with a better service, and respond to your inquiries; (iii) for internal record keeping; (iv) for internal analysis; and (v) to administer promotions, services, and offers for which you provided Personal Information and/or Non-Personal Information. Subject to the provisions below, we may also use this information for other marketing-related purposes.

With respect to Application Information:

(i) Scholarship Applications and Related Materials. As part of the application process, CMS requires prospective applicants, their parents/legal guardians and third parties (e.g., school officials) to provide information such as name, address, date of birth, telephone number, email address and/or other Personal Information and Non-Personal Information. CMS collects this information in order to contact prospective applicants and/or their parents/legal guardians, and to evaluate whether an applicant will receive any scholarship funds. Access to Application Information is restricted to current CMS personnel, Sponsors and designated third party contractors and evaluators responsible for administrative matters associated with the scholarship program (e.g., reviewing and accessing submitted applications). For those third-party individuals who are assisting in the selection process, all copies of documents are removed by CMS personnel (and/or their designees) and copies destroyed after they complete their service to CMS. To the extent that you provide us with certain Personal Information through other means (e.g., you send us an email inquiry about the program and your inquiry contains your complete name, email address and date of birth), such information is not subject to this paragraph (i) and paragraph (ii) of the Privacy Policy governing "Application Information."

Nothing herein shall restrict CMS' ability to maintain records, summaries and analysis of Application Information.

(ii) Scholarship Recipients. CMS retains the application forms of students selected as scholarship recipients. We may also retain information on all applicants regardless of whether scholarship funds were received or not received. This data remains on program servers and is accessible only to current CMS personnel and/or their designees unless, in its sole discretion, decides to destroy such information. The name, brief biography, voice, one or more photographs/images/likenesses, and/or educational institutions attended by each scholarship recipient may, in CMS' sole discretion, be used in press releases, posted on websites, used in videos and/or released through other media outlets.

Subject to the restrictions above (which apply only to Application Information), we may share your Personal Information with our Sponsors, vendors/contractors who provide services to us ("Affiliates") or with unrelated third parties to assist with any of the uses of Personal and Non-Personal Information described herein. The privacy policies of such third parties may also apply. We may also disclose your Personal Information and Non-Personal Information to third parties if disclosure is required to comply with applicable laws or regulations; in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; or if disclosure is necessary to enforce our Privacy Policy to protect your safety or security, or the safety and security of CMS or third parties. CMS assumes no liability for information transferred onward to third parties. CMS is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

We may contact you by email, phone, fax, mail, or other means unless you direct us not to do so.

We may use your Personal Information and Non-Personal Information for our own marketing purposes, including, but not limited to notifying you of new services, offers or other information via mail, email, telephone, text message, and other means. If you do not want us to use your Personal Information for marketing purposes, you may opt-out of such uses by notifying us in accordance with the procedure set forth below under the heading, "Controlling the Use and Disclosure of your Personal Information."

We may share your Personal Information and Non-Personal Information with our Sponsors and Affiliates for any purpose. If you do not want us to share your Personal Information with Affiliates for marketing purposes, you may opt-out of such uses by notifying us in accordance with the procedure set forth below under the heading, "Controlling the Use and Disclosure of your Personal Information." Although you

may request to opt-out of sharing your Personal Information for marketing purposes, we may share Personal Information with Affiliates for non-marketing purposes.

We may share your Personal Information and Non-Personal Information with our business (and other) partners for joint marketing efforts, or for our business (and other) partners' own marketing purposes. If you do not want us to share your Personal Information with such third parties for marketing purposes, you may opt-out of such uses by notifying us in accordance with the procedure set forth below under the heading, "Controlling the Use and Disclosure of your Personal Information."

## **Security and Confidentiality**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect. However, we undertake no obligation to maintain the confidentiality of non-confidential data such as feedback, questions, comments or ideas that you voluntarily provide to us. We reserve the right to use and disclose such non-confidential information as we deem appropriate. By voluntarily submitting feedback to us, you consent to these terms.

## **Other web sites**

Our program information and marketing materials may provide links and URL addresses to other web sites of interest. However, once you use these links or visit these web sites, you should note that we do not have any control over that other web site. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the web site in question.

## **Access to your Personal Information**

If you have established a User Account, you may update and change your Personal Information up to the time that you submit your scholarship application. Once submitted, all scholarship application materials become the property of the program Sponsor.

## **Controlling the Use and Disclosure of your Personal Information**

You may choose to limit the use and disclosure of your Personal Information in the following ways:

If you have previously not objected to us using your Personal Information for our direct marketing purposes, you may opt-out of receiving future marketing emails from us at any time by contacting us by phone at 630.428.2412 or by fax at 630.428.2695 with your opt-out request.

If you want to opt-out of any new uses of information permitted by this Privacy Policy caused by changes in our information practices, you may do so by contacting us by phone at 630.428.2412 or by fax at 630.428.2695 with your opt-out request.

If you do not want us to share your Personal Information with Affiliates and/or our business (and other) partners for marketing purposes, you may opt-out of such sharing by contacting us by phone at 630.428.2412 or by fax at 630.428.2695 with your opt-out request.

If you believe that any information we are holding on you is incorrect or incomplete, please contact us as soon as possible, we will promptly correct any information found to be incorrect.

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change our Privacy Policy will be updated and you will have the ability to opt-out of these new uses.

If you do not want to be contacted by us in the future (unless you initiate the contact), please let us know by contacting us by phone at 630.428.2412 or writing us to the above address (located at the beginning of this Privacy Policy).

## **Persons Under 13**

Our scholarship programs are for post-secondary educational purposes (e.g., college, university, and vocational school) for students who are generally 17 years of age or older. Therefore, we do not knowingly collect or allow the collection of Personal Information from, or related to, persons under the age of 13. If you are the parent or guardian of a person under the age of 13 and believe that the person has provided Personal Information to us, please contact us by phone at 630.428.2412.

## **Business Transactions**

We may share or transfer your Personal and Non-Personal Information if CMS enters into, or is involved in, a business transaction such as a merger, acquisition, reorganization, or sale of some or all of its assets.

## Cookies

When you visit any website administered by CMS we may use "cookies" and similar technologies to help us recognize and serve you better. Please refer to the Privacy Policy for each respective website for its specific statement on the use of cookies. Cookies are small files that contain information sent by a web site that is saved on your computer's hard drive. You may delete cookies from your computer or set your browser to reject cookies. However, doing so may limit some functionalities of our site.

## Transfer of Information

CMS is based in the United States of America ("USA"). Any Personal Information and Non-Personal information you provide to us may be stored and maintained in secure databases located in the USA. If you reside outside of the USA and provide us with your information, you consent to the transfer of such information into the USA.

CMS complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. CMS has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, CMS commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact

Charitable Management Systems, Inc  
552 S Washington Street, Suite 202  
Naperville, IL 60540  
USA

CMS has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints

concerning human resources data transferred from the EU in the context of the employment relationship.

In certain circumstances, you may invoke binding arbitration when other dispute resolution methods have been exhausted.

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If you feel that CMS is not following its stated information policy, you may contact us at the above identified mailing address.