

PRIVACY POLICY

Social Portfolio Management, Inc. ("SPMI") is committed to protecting your privacy on our websites. This policy covers the websites www.yesicare.ca & www.globalfundingday.com and other domains associated with the fund raising initiative known as " YES I CARE & or GFD - Global Funding Day.," mobile applications, and desktop clients and is applicable worldwide.

This policy outlines our handling practices and how we collect and use the Personal Data you provide during your online and offline interactions with us. As used in this Privacy Policy, "Personal Data" means any information that can be used to individually identify a person, and may include, but is not limited to, name, email address, postal or other physical address, credit or debit card number, title, and other personally identifiable information.

If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland, you may have additional rights with respect to your Personal Data, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland.

Social Portfolio Management, Inc. will be the controller of your Personal Data that is provided, collected and/or processed pursuant to this Privacy Policy, except where otherwise expressly stated below, Viz., Payment Gateways such as PayPal etc. or data base / email providers such as Constant Contact. If you have any questions about whether any of the foregoing applies to you, please contact us through the "Contact Us" section below.

This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Privacy Policy when returning to our website.

Collection of your Personal Data

We collect the following categories of Personal Data about you when you use or otherwise interact with our services or media outlets:

- Name
- Title
- Email address
- Country

We collect and/or process your Personal Data in connection with the below activities related to our services or media campaigns: Some items listed may not apply ever to your interaction while others may be future applications.

- Member registration
- Use of certain features
- Placing transactions or orders
- Registering to attend a seminar, event or webinar
- Participating in an online survey
- Billing and collecting payments for our Products
- Participating in discussion groups or forums
- Registering for newsletter subscriptions

Processing of your Personal Data

We will use your Personal Data only in accordance with our Privacy Policy. If you do not wish us to continue using your Personal Data in this manner, you can request that your account be deactivated by contacting us as specified in the "Contact Us" section.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity (i.e. processing that is necessary for the performance of a contract with you, such as your user agreement with us that allows us to provide

you with the service or media content) and our “legitimate interests” or the legitimate interest of others (e.g. our users) such as:

- Personalizing, improving or operating our business
- Better understanding your needs and interests
- Fulfilling requests you make related to our content
- Providing you with information and offers from us or third parties we clearly identify as partners with our fund raising initiatives
- Complying with our legal obligations, resolving disputes with users, enforcing our agreements
- Protecting, investigating and deterring against fraudulent, harmful, unauthorized or illegal activity

We process Personal Data for purposes including but not limited:

- To process your orders and deliver any Products/services that you may order in support of our cause or as a thank you gift, we wish to send you for being a supporter
- To provide reports based on information collected from use of our Products/Services
- To keep you up to date on the latest Product announcements, software updates, software upgrades, system enhancements, special offers, and other information related to our technology protocols and use of internet applications
- To provide the ability to create personal profile areas and view protected content
- To provide the ability to contact you and provide you with shipping and billing information
- To provide customer feedback and support
- To provide and administer opt-in contests, sweepstakes, competitions or other marketing or promotional activities on the YES I CARE / GFD or affiliate websites or fundraising campaigns
- To the extent you choose to participate, to conduct questionnaires and surveys in order to provide better products and services to our customers and end users
- To support recruitment inquiries
- To personalize marketing communications and website content based on your preferences, such as in response to your request for specific information on products and services that may be of interest
- To contact individuals that you refer to us and identify you as the source of the referral, in accordance with the “Referral” section below
- To meet contract or legal obligations

Referrals

If you choose to use our referral service to tell a friend about our websites or services/products, you represent that you have their consent to provide us your friend’s name and email address. We will automatically send your friend a one-time email inviting him or her to visit the website. Unless we are authorized by your friend, we will only use your friend’s name and email address for the purposes of sending this one-time email and maintaining an activity log of our referral program.

Choice

You can choose whether to provide Personal Data to SPMI, but note that you may be unable to access certain options, offers, and services if they require Personal Data that you have not provided. You can sign-up, and therefore consent, to receive email or newsletter communications from us. If you would like to discontinue receiving these communications, you can update your preferences by using the “Unsubscribe” link found in such emails or by contacting us using the information in the “Contact Us” section of this policy. As well our email provider has an unsubscribe link in every email they send.

Data Subject Rights

You have certain rights with respect to your Personal Data as set forth below. Please note that in some circumstances, we may not be able to fully comply with your requests, or we may ask you to provide us with additional information in connection with your request, which may be Personal Data, for example, if we need to verify your identity or the nature of your request. In such situations, however, we will still respond to let you know of our decision.

To make any of the following requests, contact us using the contact details referred to in the “Contact Us” section of this policy.

- **Access:** You can request more information about the Personal Data we hold about you. You can also request a copy of the Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- **Objection:** You can contact us to let us know that you object to the collection or use of your Personal Data for certain purposes.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Portability:** You have the right to ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another entity where technically feasible.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Products.
- **Right to File Complaint:** You have the right to lodge a complaint about SPMI practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data.

Passive Collection

SPMI and our third party service providers automatically collect some information about you when you use our websites/Services/Products, using methods such as cookies and tracking technologies (further described below). Information automatically collected (May) include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyse trends in the aggregate and administer the website and/or Products.

In addition, when you use some of our Products, network information may be transmitted back to us such as Product usage information. This information is transmitted back to us so we can determine how users are interacting with our Products, to assist us with improving our Products, and to correct any problems that may occur.

Cookies and Tracking Technologies

SPMI and our partners / hosting providers (Bluehost) may use cookies or similar technologies to analyse trends, administer the website, track users' movements around the website, and gather information about our user base, such as location information based on IP addresses. Users can control the use of cookies at the individual browser level. For more information regarding cookies or similar technologies, please review our cookie policy.

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioural advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Products Do Not Track at this time, which means that we do NOT collect information about your online activity both while you are using the Products and after you leave our properties.

Interest-Based Advertisements

We partner with third parties to either display advertising on our website or to manage our advertising on other sites. Some of our third party partners use technologies such as cookies and other technologies to gather information about your activities on this website, our affiliates' websites, and unaffiliated websites in order to provide you advertising based upon your browsing activities and interests. With respect to our interest-based ads, we adhere to self-regulatory principles for online behavioural advertising issued by the Digital Advertising Alliance ("DAA") and the European Interactive Digital Advertising Alliance ("EDAA") (collectively, the "OBA Principles"). More information about the OBA Principles can be found at <https://digitaladvertisingalliance.org/principles> and <https://www.edaa.eu/european-principles/>. If you wish to not have information about your online activities over time and across different websites used for the purpose of serving you interest-based ads, you can opt-out by clicking [here](#) and [here](#) (or if located in the EU [click here](#)). Please note that (1) this does not opt you out of being served ads, and even if you opt out of interest-based ads, you will continue to receive generic ads and (2) we store your opt-out preference for interest-based ads in a cookie on your device, and therefore you may have to opt out again if you delete your cookies. However, any advertising seen on our websites are all supporters of our cause and have been properly vetted. To be clear we do not randomly allow any type of advertisement to be displayed without our permission and all ads will be in keeping with our policies and ethical standards. Having said that, we cannot be held liable for hackers or other forced entries beyond our control but when notified will act immediately to rectify the situation.

Mobile Application

When you use our website from a mobile device, we do NOT collect information on the type of device you use, operating system version, and the device identifier (or "UDID").

Geolocation

We may collect information about where you are located when you are using our website. We use this information for purposes such as optimizing your connection to our data centre and suggesting customizations to your experience with our services (e.g. your language preference). We share this information with parties such as our data centre provider and our advertising partners. If you do not wish to allow us to share your information in this manner please opt-out by contacting us at unsubscribe@spmi.com or use the unsubscribe option from an email we have sent you.

Sharing your Personal Data

We do not sell or rent your Personal Data to third parties for marketing purposes unless you have granted us permission to do so.

We share Personal Data within SPMI/GFD and its affiliated companies, and with third party service providers for purposes of data processing or storage.

We also share Personal Data with business partners, for example Constant Contact our email provider and data base service provider, other service vendors and/or authorized third-party agents such as PayPal or contractors in order to provide requested Products or transactions, including processing orders, processing credit card transactions, hosting websites, hosting event and seminar registration and providing customer support. We provide these third parties with Personal to complete/utilize the requested Product or transaction.

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this policy. As required by law, we may respond to subpoenas, court orders, or similar legal process by disclosing your Personal Data and other related information, if necessary. We also may use Personal Data and other related information to establish or exercise our legal rights or defend against legal claims.

We collect and possibly share Personal Data and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of SPMI/GFD/YESICARE terms of service, or as otherwise required by law.

While navigating Yes I care GFD website or Products, you may be directed to content or functionality that is hosted by a third-party. When information is collected on behalf of SPMI exclusively, SPMI Privacy Policy will be referenced and will govern how your information is used. For other, non-SPMI sites or services, the site/service owner's privacy policy will be referenced. You should review such third party's privacy and security policies prior to use. For example if you view a video or other content from places like YouTube etc refer to their policies.

Security of your Personal Data

SPMI is committed to protecting the Personal Data you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure. When we transfer credit card information over the Internet, we protect it using Secure Sockets Layer (SSL) encryption technology. However, none of our servers collect or retain that information as we redirect your payment requests to a third party (Payment gateway operators) such as PayPal and for email communications to Constant Contact.

We recommend you take every precaution in protecting your Personal Data when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. If you have any questions about the security of your Personal Data, you can contact us at info@spmi.com

Linked websites and third party services

Our websites and services may provide links to other third-party websites and services which are outside our control and not covered by this policy. We encourage you to review the privacy policies posted on these (and all) sites you visit or services you use.

Chat/Newsgroups/forums

If you participate in a Yes I care or GFD discussion forum or chat room, in respect of Social media platforms, you should be aware that the information you provide there will be made broadly available to others, potentially inside or outside YES I CARE / GFD, who have access to that discussion forum or chat room. Also, please recognize that individual forums and chat rooms may have additional rules and conditions. Each participant's opinion on a forum or chat room is his or her own and should not be considered as reflecting the opinion of YES I CARE / GFD/ SPMI.

Transfer and Storage of Personal Data

Our websites are hosted and operated in the United States ("U.S.") through Blue host and its service providers. We may transfer your Personal Data to the U.S., to any affiliate worldwide, or to third parties acting on our behalf for the purposes of processing or storage. By using any of our Products or providing any Personal Data for any of the purposes stated above, you consent to the transfer and storage of your Personal Data, whether provided by you or obtained through a third party, to the U.S. as set forth herein, including the hosting of such Personal Data on U.S. servers.

EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

SPMI through its third part providers participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield. SPMI is committed to subjecting all Personal Data received from EU member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view certification, visit the U.S. Department of Commerce's [Privacy Shield List](#).

SPMI is responsible for the processing of Personal Data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. SPMI through its third party service providers complies with the Privacy Shield Principles for all onward transfers of Personal Data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Frameworks, SPMI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, SPMI and its third party suppliers may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the [Privacy Shield website](#), you can invoke binding arbitration when other dispute resolution procedures have been exhausted.

Standard Contractual Clauses

In certain cases, SPMI will transfer Personal Data from the EU in accordance with the European Commission-approved Standard Contractual Clauses, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

Contact Us

To address your individual rights or if you have any privacy-related questions or comments related to this privacy policy, please send an email to privacy@spmi.com. SPM, Inc.

Attention: Privacy Officer