



# PRIVACY STATEMENT

Effective: 1 April 2019

Family for Families, Inc. ("F4F", "we", "us", or "our") respects your privacy and is committed to protecting your personal information.

Personal information, sometimes also referred to as personal data or personally identifiable information, means any information that identifies you, either alone or in combination with other information available to us.

This Privacy Statement describes how F4F processes your personal information when you use our website, make a donation, submit a grant application, contact us for information, or otherwise interact with us.

## Who are we?

F4F is a non-profit 501(c)3 charitable entity (as defined by the U.S. Internal Revenue Service) that administers an Employee Hardship Assistance Fund. This Fund was established to support employees of the Coors Family majority-owned companies worldwide who may experience natural disasters or personal hardships that cause them significant financial strain.

F4F is the controller responsible for your personal information and is the organization that determines how and why your personal information is processed.

## What personal information does F4F collect and use?

We may collect, use, process, store and transfer different kinds of personal information about you, such as:

- Identity Data, including full name, title, employee identification number, employer name, username or similar identifier, and password.
- Contact Data, including mailing address, email address, telephone numbers, country of residence, and location of employment.
- Donation Data, including details of donations you have made, such as amount of donations, frequency of donations, records of donations, and receipts of donations.
- Personal Hardship Data, including, if applicable:
  - personal demographics, such as your age, birth date, gender, and marital status;
  - information about the personal hardship experienced, such as the date, description and pictures of the personal hardship, a description of the illness or injury, notes from your treating physician, death certificates, steps you are personally taking to address the hardship, and other information about the personal hardship you voluntarily provide;
  - information from supporting documentation of expenses for which you are seeking assistance, such as receipts, invoices and quotes;
  - information about your family members, such as their name, age, and relationship to you; and
  - information about your personal financial history and position, such as your personal income and expenses and the total assistance provided by F4F to you historically.
- Financial Data, including payment card numbers and expiration dates, bank or other deposit accounts, and other financial account numbers and details for the payment and receipt of donations and grant awards.
- Technical Data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other



technology on the devices you use to access this website.

- Usage and Communications Data, including information about how you use our website and your preferences for when and how you receive communications from us.

### Does F4F collect and use sensitive or special personal information?

The following categories of personal information may be considered sensitive under relevant laws where you reside:

- Race or ethnicity, country, region or city of birth, and primary or additional nationalities or citizenships;
- Political opinions or affiliations;
- Religious, moral, or philosophical beliefs;
- Trade union membership;
- Social welfare, sexual life, or sexual orientation;
- Criminal or alleged criminal behavior, convictions or offences;
- Personal credit or financial data;
- Genetic and biometric data; and
- Physical or mental health or condition.

We will not collect, use, process, share, transfer, or store your sensitive personal information in connection with any donations you make to F4F, unless it is necessary to collect personal credit or financial data to process your donation or tax receipts.

If you are an applicant, depending on the nature of the personal hardship you experienced, you may need to provide sensitive personal information in connection with your grant award application. For example, you may need to provide specifics about your or another individual's physical or mental health or condition or personal credit or financial data. We rely on your express, informed, written consent to allow us to process your sensitive personal information.

### How and when does F4F collect your personal information?

- Direct Interactions. We receive most of your personal information directly from you, such as when you make a donation, submit a grant application, contact us through our website or by post, phone, email or otherwise, subscribe to our publications or request communications, enter a promotion or survey, register to attend a fundraiser or other event, or give us feedback.
- Automated Technologies. As you interact with our website, we may automatically collect Technical Data about your equipment and your browsing actions and patterns through the use of cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- Third Parties or Publicly Available Sources. We may receive personal information about you from third parties and public sources, including (i) from your employer in order to approve payroll donations, supplement your grant application, or provide communications to you, and (ii) from public records and publicly available sources, such as non-private social media platforms (for example, Facebook or LinkedIn), in order to conduct due diligence or fraud prevention checks.



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## How does F4F use your personal information?

F4F may collect, use, process, transfer, and store your personal information for the following purposes:

Purpose/Activity	Type of Personal Information	Legal Basis for Processing
To process your donations, including: <ul style="list-style-type: none"> <li>- communicating with you and answering your questions about your donations</li> <li>- calculating your total donations</li> <li>- providing you with tax documentation for your donations, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>- Identity Data</li> <li>- Contact Data</li> <li>- Donations Data</li> <li>- Financial Data</li> </ul>	<ul style="list-style-type: none"> <li>- Perform a contract with you</li> <li>- Necessary for our legitimate interests (to perform our fundraising and charitable activities)</li> </ul>
To process grant applications and awards, including <ul style="list-style-type: none"> <li>- reviewing applications for assistance</li> <li>- communicating with you and answering your questions about your application</li> <li>- requesting additional information from you</li> <li>- determining grant awards</li> <li>- performing follow up activities for grant award recipients</li> </ul>	<ul style="list-style-type: none"> <li>- Identity Data</li> <li>- Contact Data</li> <li>- Personal Hardship Data</li> <li>- Financial Data</li> <li>- Sensitive personal information contained in Personal Hardship Data</li> </ul>	<ul style="list-style-type: none"> <li>- Necessary for our legitimate interests (to perform our charitable activities)</li> <li>- Your informed consent (to the extent you have given us your consent)</li> </ul>
To promote our charitable purpose, including <ul style="list-style-type: none"> <li>- using personal stories in fundraising or promotional activities</li> <li>- inviting you to participate in events, surveys, and other promotional activities</li> <li>- to provide you with information about the activities we offer and how to donate</li> </ul>	<ul style="list-style-type: none"> <li>- Identify Data</li> <li>- Contact Data</li> <li>- Donations Data</li> <li>- Personal Hardship Data</li> <li>- Financial Data</li> <li>- Usage and Communications Data</li> </ul>	<ul style="list-style-type: none"> <li>- Necessary for our legitimate interests (to perform and grow our fundraising and charitable activities)</li> <li>- Your informed consent (to the extent you have given us your consent)</li> </ul>



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<p>Administer our charitable activities and our website, including</p> <ul style="list-style-type: none"><li>– communicating with you and providing our website and services to you</li><li>– troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data</li><li>– notifying you of any changes to our website, activities, or this Privacy Statement</li><li>– receive feedback and queries from you</li><li>– auditing and monitoring the usage of our website to improve the quality of our website and compile data on how our website is being used</li><li>– to comply with any legal or regulatory obligations</li></ul>	<ul style="list-style-type: none"><li>- Identify Data</li><li>- Contact Data</li><li>- Technical Data</li><li>- Usage and Communications Data</li></ul>	<ul style="list-style-type: none"><li>- Necessary to comply with a legal obligation</li><li>- Necessary for our legitimate interests (to perform our charitable activities; to provide administration and IT services; for network security; to prevent fraud; to keep our website updated and relevant; to study how visitors use our website; to develop promotional activities; to grow our charitable activities)</li></ul>
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### Promotional Communications

You will receive promotional communications from us if you have provided your information to us and you have not opted out of receiving those communications. However, if you reside in the European Union or a jurisdiction with similar privacy laws, we will not send you any unsolicited, electronic communications, unless you have first opted-in or consented to receive those promotional communications.

You can withdraw your consent to receiving promotional communications or ask us to stop sending you promotional messages at any time by following the opt-out links on any message sent to you or by contacting us.

### Cookies

We use the following cookies on our website:

- Strictly necessary cookies to operate our website, such as enabling you to log into secure areas;
- Analytical/performance cookies to recognize and count the number of visitors to our website and to see how the visitors use our website;
- Functionality cookies to recognize you when you return to our website by, for example, personalizing content for you or remembering your language or region preferences;
- Targeting cookies to record the pages you visit and the links you follow on our website to, for example, display advertising or other information that is relevant to you.



You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

### **Who has access to your personal information?**

Access to your personal information is on a “need to know” basis. We limit access to your personal information to only those persons who are subject to a duty of confidentiality and who are required to use your personal information to achieve the purposes set out in this Privacy Statement or to satisfy a legal obligation.

In addition, F4F may provide access to your personal information to third-party service providers who assist us with administering our relationship with you, such as vendors that:

- Provide website hosting services, including Blackbaud, Inc.
- Receive and distribute donations, including PayPal, Inc.
- Perform activities related to conducting surveys, event registration and management, fundraising, and marketing and promotion
- Provide professional advice, such as accountants, tax advisers, and lawyers that assist in carrying out our activities

Those third parties are prohibited from using your information for any purpose unrelated to their primary service function. We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal information consistent with our policies and any data security obligations applicable to us.

Finally, we may disclose your personal information to authorities, including the government of the United States or its agencies, to comply with legal obligations or valid legal processes, such as mandatory reporting, search warrants, subpoenas, or court orders. When we disclose your personal information to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal information necessary for the specific purpose and circumstances.

### **Where is your personal information transferred to and stored?**

F4F is headquartered in the United States, and we will process your personal information in the United States. If you are not located in the United States, your personal information will be transferred to and stored in the United States.

F4F is committed to protecting the privacy and confidentiality of your personal information when it is transferred outside of your country.

With respect to international transfers of your personal information from locations in the European Economic Area (EEA) to jurisdictions that are not considered to provide an adequate level of data protection under EU law, we have implemented appropriate safeguards and rely on your informed consent for such transfers of your personal information.

With respect to international transfers of your personal information from locations outside of the EEA, we have implemented data transfer agreements and/or rely on your informed consent for such transfers of your personal information.

## How will your personal information be secured?

F4F maintains appropriate organizational and technical safeguards to protect your personal information from unauthorized or unlawful processing and from accidental loss, destruction, or damage.

We have implemented procedures to deal with any suspected data breach affecting your personal information and will notify you and any applicable regulator of a breach where we are legally required to do so.

We also help to protect your personal information by only working with vendors that provide a secure and safe environment for processing donations and achieving the purposes set out in this Privacy Statement.

## How long will F4F retain your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it or to satisfy any legal, tax, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider:

- the applicable legal, tax, accounting and reporting requirements,
- the amount, nature, and sensitivity of the personal information,
- the potential risk of harm from unauthorized use or disclosure of your personal information, and
- the purposes for which we process your personal information and whether we can achieve those purposes through other means.

## What rights do you have with respect to your personal information?

If you reside in the European Union or a jurisdiction with similar privacy laws, you enjoy the following rights in respect of your personal information we hold:

- **Right of access**. You may obtain access to the personal information that we hold about you. If you make this request, we will ask for specific information from you to verify your identity and to search for and provide you with your personal information. Your access may be limited if providing such access would be a violation of applicable law, excessive or unreasonable, such as compromising the privacy of another person or exposing sensitive information of F4F.
- **Right to rectification**. You may obtain rectification of your personal information without undue delay where that personal information is inaccurate, outdated, or incomplete. Please keep us informed if your personal information changes.
- **Right to erasure**. You may ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which it was collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
- **Right to restriction**. You may suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no

longer need your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.

- **Right to object.** You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes, including profiling.
- **Right to request transfer.** You may obtain your personal information in a structured, commonly used and machine-readable format for it to be transferred to another organization, where it is technically feasible. This right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
- **Right to withdraw your consent.** You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
- **Right to make a complaint.** You have the right to lodge a complaint with the relevant data protection authority, where applicable, in your country.

If you want to exercise any of these rights in relation to your personal information (excluding your right to make a complaint), please contact us. Any such communication must be in writing.

### What other information should you know?

- **Children.** Our website is not intended for children, and we do not knowingly collect personal information relating to children. By using our website, you represent that you are at least the age of legal majority in your place of residence. We do not use any mechanism to determine the age of users of our website. If we discover that we have collected or received personal information relating to a child, we will use all reasonable endeavors to delete that personal information. If you believe F4F has any personal information from or about a child, please contact us.
- **Third Party Links.** Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or processing of personal information, including cookies. When you leave our website, we encourage you to read the privacy notice of every website you visit.
- **Failure to Provide Personal Information.** Where we need to collect personal information to achieve the purposes set out in this Privacy Statement and you fail to provide that personal information when requested, we may not be able to achieve those purposes (for example, we may not be able to review or award your grant application). In this case, we may have to cancel the assistance you have requested, but we will seek to notify you if this is the case at the time.



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- Updates to this Privacy Statement. This Privacy Statement may be updated periodically to reflect changes in our personal information practices. We will post the updated version on our website and indicate at the top of the Privacy Statement when it was most recently updated.

### **How may you contact us?**

If you have any questions about this Privacy Statement, if you want to exercise any of your rights, or if you believe that your personal information is not handled in accordance with applicable law or this Privacy Statement, you may contact F4F directly through the Contact Us page on our website.