

THE FUND FOR OUR ECONOMIC FUTURE OF NORTHEAST OHIO

PRIVACY POLICY

Last modified: February 4, 2020

Introduction

The Fund for Our Economic Future of Northeast Ohio and its affiliates (collectively, “**the Fund**”, **FFEF**”, “**Company**”, “**we**”, or “**us**”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the websites www.thefundneo.org; www.jobhubsneo.org; www.Wf-connect.com; and www.paradoxprize.com; (our “**Website**”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In e-mail, text and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- On our social media pages.
- When you correspond with or otherwise interact with our members.
- When you register or attend an event or webinar sponsored by us.
- By information that we collect, receive or generate in connection with our business, professional, and consulting operations (collectively the “**Services**”).

It does not apply to information collected by:

- us offline or through any other means not listed, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see *Changes to our Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at info@thefundneo.org.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, fax number, or ANY OTHER INFORMATION THE WEBSITE COLLECTS THAT IS DEFINED AS PERSONAL OR PERSONALLY IDENTIFIABLE INFORMATION UNDER AN APPLICABLE LAW ("**personal information**");
- that is about you but individually does not identify you, such as job title, or polling type questions;
- about your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of, subscribing to our service or requesting further services. We may also ask you for information when you report a problem with our Website.
- Information you provide that is necessary to facilitate your access to, use of, or participation in our service offerings in which you have expressed interest, including, but not limited to: email alerts, content downloads, events, and our Careers page.
- Records and copies of your correspondence including e-mail addresses, if you contact us.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we take security measures to protect your provided information, please be aware that no security measures are perfect or impenetrable.

Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Please contact us at info@thefundneo.org for information on how you can opt out of behavioral tracking on this website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically is statistical data and may include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies)** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

You have the option of setting your computer to disable cookies or to alert you when cookies are being used. If you choose to disable cookies, please be aware that portions of www.thefundneo.org may not function properly. To learn more about cookies, visit resources such as <http://www.allaboutcookies.org>.

Third-party Use of Cookies and Other Tracking Technologies

Some content or applications on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We use Google Analytics and other third-party services, such as Buffer and Constant Contact, to automatically collect information from individuals for our internal analytics purposes. We use this information primarily to optimize the website, and to understand our audience, for example, to count how many individuals visit the website, where visitors come from, and how they arrive at the website. These service providers are not permitted to use this information for their own purposes.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you of the Fund's official news, activities, programs, events, and services, or otherwise engage in marketing activities.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please contact us at info@thefundneo.org to opt out.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including responding to any government or regulatory request.
- To enforce or apply our terms of use or terms of sale and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Fund, our customers or others.

Choices About How We Use and Disclose Your Information

Personal information may be given to a third party in order to complete a specific business transaction on behalf of the Fund. Such transactions may include the following:

- Your name and contact information, as provided to the Fund, may be shared with the Fund's employees in order to provide a service, satisfy a question, or develop a prospective business relationship.
- We may share your personal information with third parties that provide services to the Fund, including, but not limited to, marketing and communications; program or event enrollment; database management; or other data processing, including Google, with which we share Google Analytics data.
- We also may disclose personal information if we become subject to a subpoena, court order, or law enforcement or other government agency inquiry or investigation or if we are otherwise legally required to disclose such information. We also may use and disclose information about you to establish or exercise our legal rights, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

The Fund does not disclose an individual's personal information to third parties, except when one or more of the following conditions is true:

- The disclosure is required by law or mandatory professional standards;

- The disclosure is to another Company entity or to persons or entities providing services on our or the individual's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
- Is subject to law providing an adequate level of privacy protection;
- Has agreed in writing to provide an adequate level of privacy protection; or
- Subscribes to the Safe Harbor Principles published by the U.S. Department of Commerce.

Accessing and Correcting Your Information

The Fund takes your privacy and the protection of your personal information seriously, and we will provide you with reasonable access to and control of the personal information that you have provided to us. You may request to update your personal information, or to opt-in to or opt-out of any service offerings, at any time. If you want to access or correct your information in this way, please contact us at info@thefundneo.org.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to info@thefundneo.org or write us at: The Fund for Our Economic Future of Northeast Ohio, 4415 Euclid Avenue, Suite 203, Cleveland, OH, 44103.

California laws require operators of websites or similar services to make certain disclosures to individuals who reside in California regarding their rights, specifically:

- **Shine the Light:** Under California law, a business that has an established business relationship with an individual, and has, within the immediately preceding calendar year, disclosed personal information that is primarily used for personal, family or household purposes to a third party for the third party's direct marketing purposes, must disclose to its Californian individuals, upon request, the identity of any such third party, along with the type of personal information disclosed. We do not share any personal information with third parties for their direct marketing purposes.
- **Do-Not-Track:** Some browsers give individuals the ability to communicate that they wish not to be tracked while browsing on the Internet. California law requires that we disclose to individuals how we treat do-not-track requests. The Internet industry has not yet agreed on a definition of what "Do Not Track" means, how compliance with "Do Not Track" would be measured or evaluated, or a common approach to responding to a "Do Not Track" signal. Due to the lack of guidance, we have not yet developed features that would recognize or respond to browser-initiated Do Not Track signals in response to California law. In the meantime, there are technical means to prevent some of the tracking, if any.
- **Consumer Rights Notice:** Under California Civil Code Section 1789.3, California users are entitled to the following specific consumer rights notice: If you have a question or complaint regarding the website, please send an email as indicated in the "How to Contact Us" section.

California residents may contact the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs in writing at [400 R Street, Suite 1080, Sacramento, California 95814](mailto:400RStreet@cdca.ca.gov), or by telephone at [+1 916.445.1254](tel:+1916.445.1254) or [+1 800.952.5210](tel:+1800.952.5210).

Data Security

The data you may provide via the United States website is shared only with authorized employees of the Fund, and on a limited basis, with vendors who help us manage our website, supply information management services, and third parties in association with any Company-related events. Access to your information is limited by need, and those who have access to the data have agreed to maintain the confidentiality of such information. In addition, the Fund may disclose personally identifiable information as may be required by subpoena, search warrant, or other legal process.

The Fund retains your personal information for as long as necessary to fulfill the purposes for which it was collected as set forth in this Privacy Notice, after which we will securely destroy or delete such personal information from our records unless otherwise required by law. We will retain and use information as necessary to comply with legal obligations, resolve disputes, enforce agreements, and as otherwise set forth in this Privacy Notice

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Rights of European Economic Area (EEA) Citizens

The European Union's General Information Protection Regulation (GDPR) grants individuals who are in the European Economic Area (EEA) the following rights, with some limitations:

- **Right Not to Provide Consent or to Withdraw Consent:** We may seek to rely on your consent to process certain personal information. Where we do so, you have the right not to provide your consent, and the right to withdraw your consent at any time. If you withdraw your consent, this will not affect the lawfulness of the processing conducted based on consent before its withdrawal.
- **Right of Access:** You have the right to obtain confirmation as to whether we collect or process personal information concerning you and, if this is the case, you have the right to request a copy of such personal information in digital format.
- **Right of Rectification:** You have the right to require that we correct any inaccurate personal information concerning you, and that we complete incomplete personal information.
- **Right of Erasure:** In certain circumstances, you have the right to request that we erase personal information concerning you; for example, if it is no longer necessary for the purposes for which it was originally collected.

- **Right to Restrict Processing:** In certain circumstances, you have the right to request that we restrict the processing of the personal information that we have collected about you; for example, where you believe that the personal information that we hold about you is not accurate or lawfully held.
- **Right to Information Portability:** In certain circumstances, you have the right to receive the personal information concerning you that you have provided us in a structured, commonly used, machine readable format, and the right to obtain that we transmit the information to another entity where technically feasible.
- **Right to Object to Processing:** In certain circumstances, you have the right to request that we stop processing your personal information.
- **Right to Object to the Processing for Direct Marketing Purposes:** You have the right to request that we stop sending you marketing communications.
- **Right Not to be Subject to Decisions Based Solely on Automated Processing that Produce Legal Effects:** In certain circumstances, you have the right not to be subject to a decision based solely on automated processing - including profiling - that produces legal effects or similarly affects you.
- **Right to Complain to a Supervisory Authority:** You have the right to lodge complaint with a supervisory authority or other dispute resolution mechanism if you believe that our processing of personal information relating to you infringes your rights under Applicable Law.

Individuals may contact us at info@thefundneo.org or write us at: The Fund for Our Economic Future of Northeast Ohio, 4415 Euclid Avenue, Suite 203, Cleveland, OH, 44103, to exercise any of these rights, and we will respond with the requested action or information or will let you know why that right does not apply to you.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the e-mail address specified in your account or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

The Fund, headquartered at The Fund for Our Economic Future of Northeast Ohio, 4415 Euclid Avenue, Suite 203, Cleveland, OH, 44103, is the entity that determines the nature, purpose, and means for the processing of all personal information, unless otherwise stated in this Privacy Notice. For questions, concerns, or complaints about this privacy policy or our privacy practices, contact us at info@thefundneo.org.

Or write to us by postal mail to:

The Fund for Our Economic Future of Northeast Ohio
4415 Euclid Avenue, Suite 203
Cleveland, OH 44103