

Corduro Privacy Policy

Version 03.10.2012

At Corduro, we are committed to protecting your privacy online. Our goal is to safeguard any personal information you provide to us. Personal information includes data that reasonably can be used to identify or describe an individual, such as name, address, phone number, and e-mail address.

In this Privacy Policy, "Service" means our website, software, and the services we provide. Please note, this Privacy Policy does not apply to information we collect by means other than through your use of the Service (including offline) or from other sources.

When you use our Services you agree to accept this Privacy Policy. We may change this policy at any time.

Information We Collect

When you visit our website, or register for one or more of our Services, we may collect the following information:

- When you register, we collect your name, location, phone number, email address and other related information.
- When you access our Services to establish your Corduro account we may collect bank account and payment card numbers, and information about financial institutions where you conduct business.
- When you use our payment services: we record your account transactions, transaction location, and we may collect information about your computer or mobile or other access device.
- We may record your location if location may be used to enhance the quality of services provided.
- Additional information from or about you may also be collected in other ways, including responses to customer surveys or your communications with our vendors, customers, other Corduro community members or our customer service team.

Use of Cookies

It is important for us to track how our website and Services are used, and we (or our service providers) may place "cookies" on your computer or mobile or other access device. Cookies are small data files that identify you when you use our Services. You have the option to decline our cookies by using your browsers settings tools, but this may interfere with your use of our website and Services.

Log File Information

When you register with or view our site or access our mobile services, our servers may automatically record certain information that your web browser or other access device sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information.

Protecting Personal information

Any information that can be used to identify a person is "Personal Information". This does not include information that has been aggregated or made anonymous. All information is securely stored on our servers in the United States. Our safeguards and procedures have been implemented in accordance with US state and federal law and regulations to maintain the physical and electronic security of our software, services and your

personal information. Our measures include firewalls, data encryption, physical and electronic access controls, and strict rules regarding the access and use of data on our system.

Using Personal Information

We use your Personal Information to provide you the features and functionality of our Services, and may share it with our trusted third parties or as otherwise directed or permitted by you, to ensure that you have a safe, high-performance experience when using the Service. When you use the Service, including accepting a payment, making a payment, connecting with an organization, joining with an organization, inviting others to participate or join an organization, contacting customer service or requesting technical support, in addition to many other interactions with Corduro, we will apply the information that we have collected. Knowing this information allows us to verify your identity, communicate with you and enforce our agreements with you, as well as secure the best possible experience for all Corduro members by ensuring compliance with US state and federal laws and our own policies.

We may also use Personal Information to measure how our members use the Service, and improve and enhance our offerings to you. Corduro will provide information to organizations as you use our Service based on the Privacy Settings you set in your Member portal.

Corduro may use certain information about you without identifying you as an individual to third parties. We do this for purposes such as analyzing how the Service is used, diagnosing service or technical problems, maintaining security, and personalizing content. We use information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors and traffic; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and (f) help you efficiently access your information after you sign in.

Sharing Personal Information

Corduro will not rent or sell your Personal Information to others. We may, however, share your Personal Information with third parties for the purpose of providing Services to you (such as described below). If we do this, such third parties' use of your Personal Information will be bound by terms at least as restrictive as this Privacy Policy. We will NOT store personal information in locations outside the direct control of Corduro.

a. Organizational Access to your Personal Information

When you check-in, pay, give, favorite, join, or volunteer with an organization, you are authorizing Corduro to share your information with the organization associated with that action. Corduro provides you with the ability to restrict that information by organization, and enables you to set a default level for all organizations in our network, it is your responsibility to manage the visibility of your information. When you sign up, the default setting enables organizations to see your name and email. Any other information stored in our system will not be shared unless you specifically change the default or organizational settings in the portal or mobile application. In the event that your activity was payment related we will be required to share additional information such as address and contact phone number that is associated to the payment method in use, whether it originates from an electronic wallet or a one-time entry of the payment billing details. <http://www.corduro.com/policies/privacy> When we are authorized by you to share, or are otherwise required to share your information with another organization (e.g. when making a payment), our privacy policy will continue apply to your information while it is in our possession, but once we have delivered your information to another organization, the privacy policy of that organization will apply to the information in their possession.

b. Special Events

We may run contests, special offers, or other events or activities (“Events”) on the Service together with third party partners. If you provide information to such third parties, you give them permission to use the information in connection with that Event and any other use that you approve. We cannot control third parties’ use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events.

Transfer of Personal Information

In the event that we sell our business or a business unit, we may transfer your Personal Information to the purchaser as part of our business assets. We may also transfer such information in the course of corporate divestitures, mergers, or dissolution.

Compromise of Personal Information

In the event that Personal Information is compromised as a result of a breach of security, Corduro will promptly notify those persons whose Personal Information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, by email, or as otherwise required by applicable law.

Your Choices About Your Information

You may, of course, decline to submit personally identifiable information through the Service, in which case Corduro may not be able to provide certain services to you. You may update or correct your account information at any time by logging in to your account. You can review and correct the information about you that Corduro keeps on file by contacting us as described below.

Sharing Payment Information

If you use a Service for payment transactions we are required to share your personal information with third parties, including but not limited to:

1. Organizations that you are paying or for whom you are accepting payments on their behalf.
2. Service providers who provide us a range of essential operational services including fraud prevention, transaction processing, collections, direct marketing, and managed technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
3. Verification services and credit bureaus to underwrite your application for Corduro accounts and to comply with our legal credit reporting rights and obligations.
4. Financial institutions that allow us to offer you payment processing services, and partner with us to develop new offerings for you and other Corduro members.
5. Other users of the Services who may accept payments from you through using Corduro.
6. Law enforcement authorities or government representatives who may require us to share information in order to comply with court order and other legal mandates, or when we believe that disclosure is necessary to report suspicious activities, prevent physical harm, financial loss, or violations of our agreements and policies.
7. Other third parties, subject to your prior consent or direction.

Children’s Privacy

Protecting the privacy of young children is especially important. For that reason, Corduro does not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register with our Service. If you are under 13, please do not send any information about yourself to us,

including your name, address, telephone number, or email address. No one under age 13 is allowed to provide any personal information to or on Corduro. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us as described below.

Links to Other Web Sites

Corduro is not responsible for the practices employed by websites linked to or from our website or Services, nor the information or content contained therein. Please remember that when you use a link to go from our website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

Notification Procedures

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email, written or hard copy, or through conspicuous posting of such notice on our website, as determined by Corduro in its sole discretion. We reserve the right to determine the form and means of providing notifications to you.

Changes to Our Privacy Policy

If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are updated on our website.

Acknowledgement

Except as otherwise described in this Privacy Policy, Corduro will not disclose Personal Information to any third party unless required to do so by law or subpoena or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce this agreement, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site; and (c) to exercise or protect the rights, property, or personal safety of Corduro, users of our Services or others.

Version 03.10.2012