

## **Celo Community Fund Privacy Policy**

*Last Updated: April 2, 2021*

- **Overview**
- **Information We Collect**
- **How We Use the Information We Collect**
- **How We Share the Information We Collect**
- **Third Parties**
- **Your Privacy Rights – General Information**
- **How to Make Data Requests – Information for California Residents**
- **How to Make Data Requests – Information for EU Data Subjects**
- **Information for Nevada Residents**
- **Children’s Privacy**
- **Security**
- **Updates to This Privacy Policy**
- **Contact Information**

### **Overview**

This Privacy Policy describes Celo Community Fund, Inc.’s (“CCF”) policies regarding the collection, use, and disclosure of information about you in connection with your use of our website (the “Site”) and the CCF grant application (collectively, the “Services”). The terms “we”, “us”, and “CCF” refers to Celo Community Fund, Inc., with its headquarters in San Francisco, California.

When you use our Site and Services, you consent to our collection, use, and disclosure of information about you as described in this Privacy Policy.

A link to a Portable Document Format (PDF) version of the policy can be found [here](#).

### **Information We Collect**

CCF collects Personal Information to facilitate your use of the CCF Site and Services. “Personal Information” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is being associated with an identified or reasonably identifiable individual.

#### ***Personal Information That We Collect Directly From You***

CCF collects the following categories of information directly from individuals:

*Through Its Website*

<b>Category of Personal Information</b>

Email Address
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*Through Its Grant Application*

When applying for a Celo Community Fund Grant and filling out the CCF application, you may be asked to provide the following information to CCF:

<b>Category of Personal Information</b>
Project Name
Individual Name(s)
Entity or Organization Name
Email Address
Project Overview
Description of Intended Development
Website URL for Project
Website URL for Any Demo
Location of Team Members
Description and Biographic Information of Team Members
LinkedIn Profiles of Team Members
GitHub Profiles of Team Members
Video Submission of Project
Racial or National Origin Identification (Voluntary)
Background Information on Why Project is Being Submitted for Grant Funding
Information as to Whether Project is Live
Countries in Which Project is Available
Evidence of Project Success

Level of Grant Requested
Details to Support Grant Request
Project Milestones
Metrics for Measuring Project Success
Reasons for Building Project on Celo
How the Project Contributes to Celo's Mission
Whether or Not the Project is Open Source
Link to GitHub Code Repository
Whether or Not the Individual or Organization Was Referred for a Grant
Whether or Not Other Grant Funding Has Been Received
Agreement to Grant Application Terms and Conditions

### ***Accuracy and Retention of Personal Information***

CCF takes reasonable and practicable steps to ensure that your Personal Information held by us is accurate with regard to the purposes for which it is to be used, and is not kept longer than is necessary for the fulfillment of the purpose for which it is to be used.

### **How We Use the Information We Collect**

The Personal Information we collect and the practices described above are done in an effort to provide you with the best experience possible, protect you from risks related to improper use and fraud, and help us maintain and improve CCF's offerings. We may use your Personal Information to:

- **Provide you with CCF Services.** CCF uses your Personal Information to provide you with our Services.
- **Comply with legal and regulatory requirements.** CCF processes your Personal Information as required by applicable laws and regulations.
- **Protect the security and integrity of our services.** CCF uses your Personal Information to further our security practices related to Personal Information.

- **Provide you with customer support.** CCF processes your Personal Information anytime that you reach out to our Customer Support team with issues arising from your account.
- **Optimize and enhance our Services.** CCF uses your Personal Information to understand how our products and services are being used to help us improve our services and develop new products.
- **Market our products to you.** CCF may contact you with information about our and Services. We will only do so with your permission, which can be revoked at any time.
- **Other business purposes.** CCF may use your information for additional purposes if that purpose is disclosed to you before we collect the information or if we obtain your consent.

### **How We Share the Information We Collect**

CCF will not share your Personal Information with third parties, except as described below.

- **Third-Party Service Providers.** CCF may share your Personal Information with third-party service providers for business or commercial purposes. Your Personal Information may be shared so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, Information Technology, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. CCF may share your Personal Information with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your Personal Information for any other purpose. Our third-party service providers are subject to strict confidentiality obligations.
- **Third Party Vendors.** CCF may utilize third-party applications, tools, and websites to provide its Services. Please review the privacy practices of these third parties below. CCF disclaims all liability arising from the use of these third-party applications, tools, and websites.
- **Law Enforcement.** CCF may be compelled to share your Personal Information with law enforcement, government officials, and regulators.
- **Corporate Transactions.** CCF may disclose Personal Information in the event of a proposed or consummated merger, acquisition, reorganization, asset sale, or similar corporate transaction, or in the event of a bankruptcy or dissolution.
- **Professional Advisors.** CCF may share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.
- **Consent.** CCF may share or disclose your information with your consent.

If CCF decides to modify the purpose for which your Personal Information is collected and used, we will amend this Privacy Policy.

### **Your Privacy Rights – General Information**

CCF is required under certain domestic and international data laws to provide certain information to individuals about how CCF collects, uses, and shares your Personal Information, and about the rights and choices that you may have concerning your Personal Information. The following sections provide an overview of the Personal Information that CCF collects, uses, and shares; outlines the rights that you have concerning your data; and the actions that you can take to make certain requests concerning your Personal Information.

### ***Personal Information That CCF Collects, Uses and Shares***

For ease of reference, CCF has compiled the list below to demonstrate how we use the categories of Personal Information we have collected, used, and disclosed.

The purposes for the collection, use, and sharing of information include:

<b>Category of Personal Information</b>	<b>How It Is Collected</b>	<b>How It Is Used</b>	<b>How It Is Shared</b>
Email Address	Through use of the Site or submission of a Grant Application.	To contact you regarding Grant availability or in the submission of a Grant Application.	CCF does not sell or share information with third parties.
Grant Application Form (See the Section of this Privacy Policy, <i>“Personal Information That We Collect Directly From You, Through Its Grant Application”</i> )	Through use of the Site or submission of a Grant Application.	To contact you regarding Grant availability or in the submission of a Grant Application.	CCF does not sell or share information with third parties.

## **How to Make Data Requests - Information for California Residents**

CCF is required under the California Consumer Privacy Act of 2018 (“CCPA”) to provide certain information to California residents about how we collect, use, and share their Personal Information, and about the rights and choices California residents may have concerning their Personal Information. For purposes of this section, “Personal Information” has the meaning provided in the CCPA.

### ***Rights Afforded to California Residents***

California consumers have the following rights under the CCPA with respect to their Personal Information. Please understand, however, that these rights are not absolute, and CCF may decline requests as permitted under applicable law.

- **Right to Request Access.** You may submit a request that CCF disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you in the past twelve (12) months.
  - Without having to submit a request to access your Personal Information, you have the right to know what categories of Personal Information CCF has collected from consumers generally within the past 12 months, where we got it, why we collected it, and with whom we shared it.
  - We have not “sold” Personal Information within the past 12 months, as that term is defined by the CCPA.
- **Right to Request Deletion.** You may submit a request that CCF delete the Personal Information that we have about you.
- **Right to Opt out of Sale of Personal Information.** You have the right to opt out of the sale of your Personal Information. CCF does not sell your Personal Information.
- **Right Not to Receive Discriminatory Treatment.** You have the right to exercise the privacy rights conferred by the CCPA without discriminatory treatment.

You may submit a request to access or delete your Personal Information by emailing us at [info@celocommunityfund.org](mailto:info@celocommunityfund.org)

CCF is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the CCPA on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant

to Probate Code Sections 4000 to 4465. CCF may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

Please understand that we are not obligated to provide you with a copy of your Personal Information more than twice in a twelve (12) month period pursuant to the CCPA.

### ***How to Make Data Requests – Information for California Residents***

To make a data request, you can elect to contact CCF through the following method:

- Email the CCF Privacy Team at [info@celocommunityfund.org](mailto:info@celocommunityfund.org)

### ***What happens after I submit a request?***

Once we receive your request, CCF must first verify your identity. CCF will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity using the information we have on file. If you wish to designate an authorized agent to make a request on your behalf, please indicate that when submitting your request.

CCF will make good faith efforts to respond to your request. There may be circumstances under the CCPA in which CCF cannot, or need not, respond to your request. For example, CCF is not required to delete Personal Information needed to complete the transaction for which the Personal Information was collected (such as completing a sale), to detect fraudulent or illegal activity, or for legal compliance purposes. CCF is also not required to provide access or deletion where your identity could not be verified, where you have exceeded the number of requests you can make within a twelve-month period, or where the information contains legally privileged material or would violate the rights of others. If CCF determines that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

Any requests that can be processed by CCF will be done so in no more than forty-five (45) days from the date we receive your request, unless we notify you that an extension is required. In case of an extended completion period, CCF will process your request in no more than ninety (90) days from the date of your original request. Consumers are limited to two requests to know/access their Personal Information within a twelve (12) month period.

### **Information for Subjects of the EU General Data Protection Regulation**

CCF is required under the European Union General Data Protection Regulation (“GDPR”) to provide certain information to EU data subjects about how we collect, use, and share their Personal Information, and about the rights and choices California residents may have concerning their Personal Information. For purposes of this section, “Personal Information” has the meaning provided in the GDPR.

### ***Rights Afforded to EU Data Subjects***

EU Data Subjects have the following rights under the GDPR with respect to their Personal Information. Please understand, however, that these rights are not absolute, and CCF may decline requests as permitted under applicable law.

- **Right to Request Access / Right to Be Informed.** You may submit a request that CCF disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you.
  - Without having to submit a request to access your Personal Information, you have the right to be informed (right to know) what categories of Personal Information CCF has collected from consumers generally, where we got it, why we collected it, and with whom we shared it.
- **Right to Request Erasure.** You may submit a request that CCF delete the Personal Information that we have about you.
- **Right to Rectification (Correct or Update Your Personal Information).** You may submit a request that CCF correct or update Personal Information that CCF may have about you.
- **Right to Data Portability.** You may submit a request that CCF provide you with a readily accessible, portable format of the Personal Information CCF may have collected, processed, or stored about you.
- **Right to Object to the Processing.** You may submit a request to CCF to revoke your consent to the processing of the Personal Information CCF may have collected, processed, or stored about you.
- **Right to Restrict Processing.** You may submit a request to CCF to restrict the processing of the Personal Information CCF may have collected, processed, or stored about you.

You may submit a request to access or delete your Personal Information by emailing us at [info@celocommunityfund.org](mailto:info@celocommunityfund.org).

CCF is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the CCPA on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant to Probate Code Sections 4000 to 4465. CCF may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and UK are available [here](#) and Switzerland are available [here](#).

If Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any



processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

### ***How to Make Data Requests (for EU Data Subjects)***

To make a data request, you can elect to contact CCF through the following method:

- Email the CCF Privacy Team at [info@celocommunityfund.org](mailto:info@celocommunityfund.org)

### ***What happens after I submit a request?***

Once we receive your request, we must first verify your identity. We will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity using the information we have on file. If you wish to designate an authorized agent to make a request on your behalf, please indicate that when submitting your request.

We will make good faith efforts to respond to your request. There may be circumstances under the GDPR in which we cannot, or need not, respond to your request. For example, we are not required to delete Personal Information needed to complete the transaction for which the Personal Information was collected (such as completing a sale), to detect fraudulent or illegal activity, or for legal compliance purposes. We are also not required to provide completion of a rights request where your identity could not be verified, or where the information contains legally privileged material or would violate the rights of others. If we determine that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

Any requests that can be processed by us will be done so in no more than thirty (30) days from the date we receive your request, unless CCF notifies you that an extension is required. In case of an extended completion period, we will process your request in no more than ninety (90) days from the date of your original request.

### **Information for Nevada Residents**

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. CCF does not sell your Personal Information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. If you have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please contact us at [info@celocommunityfund.org](mailto:info@celocommunityfund.org).

### **Children's Privacy**

CCF Services are intended for general audiences and is not directed to children under 17. We do not knowingly collect Personal Information from children under 17. If you become aware that a child has provided us with Personal Information without parental consent, please contact us at [info@celocommunityfund.org](mailto:info@celocommunityfund.org). If CCF becomes aware that a child under 17 has provided us with Personal Information without parental consent, CCF takes steps to remove such information and terminate the child's account.

### **Security**

No security is foolproof, and the Internet is an insecure medium. CCF cannot guarantee absolute security, but we work hard to protect CCF and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information that we collect and store.

CCF addresses its guarantees as to privacy and security in the various agreements and data processing addendum that it enters into contractually with its Customers.

### **Updates to This Privacy Policy**

CCF may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern our collection, use, and disclosure of information about you and will be located at <https://celocommunityfund.org/privacy.html>.

If CCF makes material changes to this Privacy Policy, we will notify you by email or by posting a notice on our website prior to or on the effective date of the changes. By continuing to access or use the services after those changes become effective, you acknowledge the revised Privacy Policy.

### **Contact Information**

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to contact CCF through the following:

Email: [info@celocommunityfund.org](mailto:info@celocommunityfund.org)