

Lorenzo's House Privacy Policy

This Privacy Policy (this "**Privacy Policy**") governs how Lorenzo's House collects, uses, and treats personal information that you provide to us ("**Lorenzo's House**", "**we**," "**our**", or "**us**"): (i) through our website at <https://www.lorenzoshouse.org/> (our "**Website**"); and (ii) while using the services we provide, such as our Memory Academy, Care Angels, Youth Camp and other individual and group programs and activities that we may provide from time to time (the "**Services**") (the Services, together with our Website, our "**Platform**"). This Privacy Policy establishes our rights and obligations with respect to your personal information, and lets you know your associated rights.

1. **Your Consent to this Privacy Policy.**

Our Privacy Policy applies to individuals who use our Website, or participate in our Services (collectively, "**you**"). You indicate your consent to this Privacy Policy in different ways, depending on your relationship with us, as set forth below. Please read this Privacy Policy carefully; once you consent to this Privacy Policy and its terms, it creates legal obligations on you and on us.

1.1 **Consent by Website Users.**

By accessing our Website, you are acknowledging that you have read and understood this Privacy Policy and agree to be legally bound by it.

1.2 **Consent by Service Recipients.**

When you provide information in connection with participating in one of our programs, you similarly consent to this Privacy Policy. We will take reasonable steps to notify you of this Privacy Policy at the point where we collect the information.

1.3 **Our "Authorization and Consent" Form.**

To promote our Services and our mission, we periodically ask recipients of our Services (and others interested in our Services) if we may use photos, videos, stories, and other content that reflect their participation in our programs. At some point, we may ask for your permission in this regard. We will ask your permission via a written "Authorization and Consent" form (each an "**Authorization and Consent**"), and the Authorization and Consent will specify the specific scope and nature of your consent. You are free to give, or withhold your consent, and we will not use these photos, videos, stories, or other content in any way that identifies you (or otherwise contains your Personal Information), unless you give your express consent by signing the Authorization and Consent.

1.4 **Right to Withdraw Consent.**

You have the right to withdraw your consent under this Privacy Policy at any time, in accordance with Section 10 (Your Choices Regarding Your Personal Information; Opting Out). If you have agreed to, and signed, an Authorization and Consent, you have the right to withdraw your consent in the manner specified in that Authorization and Consent.

2. **The Information We Collect.**

The information that we collect about you falls into certain categories as further described in this Section 2 (The Information We Collect). This information consists of the following:

2.1 **Personal Information.**

We collect certain information that identifies you as an individual (collectively, "**Personal Information**"). The Personal Information we collect may include the following categories of information:

- Your name, email address, and password;
- Your other contact information, including a mailing address and phone number;
- Your date of birth;
- Your payment information, including credit or debit card, bank account, or other financial account information; and
- Your geolocation information.

2.2 **Online Activity Information.**

We also collect technical and device-related information through our Website (collectively, "**Online Activity Information**").



Online Activity Information is typically collected automatically by technical means for purposes of our Platform, may consist of the following:

- Device identifiers, such as cookies;
- Device information, such as hardware and software settings;
- IP addresses and log information, such as your device's name, the type and version of your web browser, and referrer addresses that can function to identify a user device; and
- Tracking information that we, or a third party, may collect.

2.3 **Anonymous Information.**

Our Website also collects and uses, and our Services similarly use, information that does not identify you or your devices, including Personal Information that has been made anonymous by: (i) removing identifying fields and aggregating the information with other information so that individual subjects of the information cannot be re-identified, or (ii) anonymizing the information with techniques that remove or modify the identifying data so as to prevent re-identification of the anonymized information (collectively, "**Anonymous Information**"). Information that meets these criteria might include, for example, demographic information, statistical information (e.g., page views and hit counts), and general tracking information. We use Anonymous Information for our business operations. Because Anonymous Information does not include Personal Information, Anonymous Information is outside the scope of this Privacy Policy.

2.4 **Treatment of Combined Information.**

To enable us to better understand the characteristics of our users and/or to provide Services tailored to your needs, we may link your Personal Information with Online Activity Information associated with you or other Anonymous Information. If we combine Online Activity Information or Anonymous Information with Personal Information, then we will treat the resulting combination as Personal Information.

3. **How We Collect this Information.**

We collect the above information through the following means and technologies:

3.1 **Program Participation.**

We encourage broad participation in our programs. To participate, we will ask you to provide contact information, among other information, and this will include Personal Information. We will use this information to manage the program, facilitate your participation, and communicate with you about the program.

3.2 **Registering as a Volunteer.**

To register with us as a volunteer, may provide us with certain information, including Personal Information. We will use this information to communicate with you, onboard you as a volunteer, and for other similar purposes.

3.3 **Donations.**

When you make donations via our Website, you use the payment processing methods that we have facilitated via our Website. We will collect your transaction information from the third party payment processor(s) that we have authorized to collect such information from you on our behalf. For more information on our privacy practices with respect to our service providers, please refer to Section 5.1 (Our Service Providers). The payment information that our payment processor will collect from you during this process may include your bank account or other financial account information, credit card number, the expiration date of your credit card, transaction amount, date of transaction, and payment method. The payment processor may also collect certain Personal Information from you, such as your name and billing address. Please note that different payment processing methods may require you to provide different categories of information.

3.4 **User Generated Content.**

Please understand that, if you include Personal Information in Submitted Content (as defined in our Terms), others will be able to read, collect, republish, and otherwise freely use the information.

We are not responsible for Personal Information you decide to include in Submitted Content, and we will not take down, remove, or edit Submitted Content, except as required by Applicable Law. If you include in your Submitted Content any Personal Information relating to others, you represent that you have full permission and authority to do so.

3.5 Contacting Us.

You can contact us with questions or comments using the contact methods available on our Platform or using the information provided in Section 14 (Contact Us). In order to communicate with us, you must provide certain Personal Information.

3.6 Information Provided to Third Parties.

As explained further in Section 5.1 (Our Service Providers), we may engage third parties to perform certain services for us or on our behalf. The forms on our Platform may be managed by such third parties, and we may obtain from the applicable service provider the information that you provide using such forms.

3.7 Newsletters.

We may offer newsletters and other content that we believe may be of interest to you. We will use your Personal Information to provide you with this content. You can opt-out of receiving this content by following the instructions set out in Section 10 (Your Choices Regarding Your Personal Information; Opting Out).

3.8 Questionnaires and Surveys.

We may ask you periodically if you wish to participate in surveys and questionnaires. We'll post these on the Website from time to time, send to you via the contact information that you provide to us, or hand them out at a program in which you are involved. You are free to choose whether you participate in a survey or questionnaire. We may ask that, in addition to providing your responses, you also provide Personal Information. In these instances, we use any information that you provide to us for the purposes for which you submit the information. Survey and questionnaire information may be used for the purposes of monitoring or improving the use and appeal of our Platform or for other business purposes. If we wish to use the information for promotional purposes, we will do so only if you agree, and have signed an Authorization and Consent.

3.9 Online User Activity, Cookies and Information Collected by Other Automated Means

When you interact with the Services, certain information about your use of our Services is automatically collected. This includes:

- *Usage Details* about your interaction with our Services (such as the date, time, and length of visits, and specific pages or content accessed during the visits, search terms, frequency of the visits, referring website addresses);
- *Device Information* including the IP address and other details of a device that you use to connect with our Services (such as device type and unique device identifier, operating system, browser type, mobile network information, and the device's telephone number);
- *Site usage and session information*, including the resources that you access, pages viewed, how much time you spent on a page, and how you reached our website.

Much of this information is collected through cookies, web beacons, and other tracking technologies, which may be operated by our partners who assist us in collect information about usage of the Services, serving ads, or providing other services to you. For example, we use Google Analytics to collect usage details. You can learn more about privacy and Google Analytics by [visiting https://support.google.com/analytics/answer/6004245](https://support.google.com/analytics/answer/6004245), and opt out of collection of your data by using the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>. We may also use cookies set by other third-party services. You may be able to opt out tracking by cookies or control how information collected by cookies is used via the means described below in Section 10 (Your Choice Regarding Your Personal Information; Opting Out).

3.10 Geolocation Information.

Our Website may determine your location (your "**Geolocation Information**") using your device or browser features and/or through the information provided by a third party. You may prevent providing your Geolocation Information by disabling the GPS and other applicable features in your device or browser settings. To the extent your Geolocation Information is combined with any Personal Information (to the extent that Geolocation Information itself does not constitute Personal Information under Applicable Law), we will treat it as Personal Information. We may use your Geolocation Information to send communications to you, and for other purposes set out in this Privacy Policy.

3.11 Click-Throughs.

We may send email messages or display links that use a "click-through URL" linked to our Platform or to another resource.

When you click one of these URLs, you pass through our web server before arriving at the destination website page or other resource. Click-throughs may use and collect Anonymous Information and Online Activity Information. We may track this click-through data to help determine interest in particular topics and measure the effectiveness of our user communications.

3.12 Collection of Personal Information Offline.

We may ask you to provide us with Personal Information via offline interactions. Personal Information we collect in this manner may include, for example, your name, username, email address, and other identifying information. If you provide information to us at our request, then we will strive to provide you with either verbal and/or written notice of this Privacy Policy upon your request for a copy of the Privacy Policy.

4. How We Use this Information.

We use the information we collect or process, including Personal Information, Online Activity Information, and Anonymous Information, as permitted under Applicable Law, and consistent with the terms of this Privacy Policy. More specifically, we use the information we collect for the following purposes:

- To provide you with the Services you request or access, including to access use our Website, complete donations, and communicate with you regarding our Services;
- To allow you to post Submitted Content, such as to submit text, photographs, videos, and other materials for promotion, marketing, or other purposes;
- To respond to your inquiries and provide support;
- To customize and enhance your use of our Website, such as by personalizing your experience with us; To provide communications that might interest you;
- To verify your identity and to securely process your requests for Services;
- To perform analytics, quality control, market research, and to determine the effectiveness of our Platform, and of our promotional campaigns, to improve our Platform, and to develop new products and services;
- To perform internal administration, auditing, operation, and troubleshooting of our Platform; To share the information with third parties as permitted in this Privacy Policy; and
- To publicly promote our Services, if you have signed an Authorization and Consent, and solely in the manner permitted under that Authorization and Consent.

In addition to the uses specifically identified above, there may be instances where you request information and Services from us that are not described in this Privacy Policy. In our discretion, we can use information that you submit in order to provide such information and Services.

5. How We Share this Information.

We value your privacy, and we share the information we collect only in the manner set out below.

5.1 Our Service Providers.

We engage third parties to perform functions on our behalf, and these may include maintaining the Platform, processing payments, fulfilling and shipping orders, collecting information, responding to and sending email or other messages, and other functions useful to our business. In this capacity, we may provide service providers with Personal Information, Online Activity Information, and Anonymous Information (as applicable). The following are examples:

- Our Platform may include links to third party websites offering services that augment those Services offered on our Platform.
- We may use service providers to: (i) process payment transactions and fulfill orders; (ii) provide customer service (where applicable); (iii) process and distribute email and newsletters; (iv) manage marketing and similar activities; (v) provide you with access to various portals and platforms on which to perform activities; and (vi) receive assistance in organizing and hosting our events and programs. These service providers generally require access to your Personal Information in order to perform these services.
- We may use analytics service providers to assist us in understanding and using Online Activity Information and other

information that we collect via the Platform.

- We may use service providers to anonymize and aggregate Personal Information in order to generate Anonymous Information.
- We may engage service providers to analyze the interests and attributes of our users and, using techniques based on Anonymous Information and Online Activity Information, identify others who might share those interests and attributes. We then use this information to reach out to relevant market segments to provide them information concerning the Platform or Services.

We require our service providers to contractually commit to protect the privacy and security of the Personal Information they process on our behalf.

5.2 Questions of Harm; Legal Process.

We may disclose your Personal Information and Online Activity Information to third parties, including law enforcement agencies, attorneys, and private investigators, where it is necessary, or where we have a good faith belief that it is necessary to: (i) comply with legal process; (ii) protect and defend our rights and property, including the Platform, Services, and associated content; (iii) protect against misuse or unauthorized use of our Platform, Services, and associated content; (iv) protect the personal safety or property of Platform users or the public, including your personal safety or property (it being understood that we assume no duty to provide, or monitor the need for, such protections); and (v) cooperate with public and government authorities including, where required, authorities outside your jurisdiction.

While you are not able to opt out of this use of information, we will take reasonable steps to limit such use, and disclose only the information we reasonably believe is necessary for the above purposes. If we receive legal process calling for the disclosure of your Personal Information, then we will attempt to notify you within a reasonable amount of time, unless such notification is not permitted.

5.3 Corporate Transactions.

We shall be entitled to transfer information that we collect (including Personal Information) to a third party in connection with or in contemplation of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition (including a disposition in connection with a bankruptcy or similar proceedings) of all or substantially all assets or stock of the business unit or division responsible for the information under this Privacy Policy; provided the acquiring third party has agreed to safeguard your Personal Information with protections that are compatible with those set out in this Privacy Policy.

5.4 Our Affiliates.

We may choose to rely on and share the information we collect with our affiliates. Our affiliates will be bound by the terms of this Privacy Policy.

6. How We Safeguard the Information We Collect.

We recognize the sensitivity of our users' Personal Information and we have put in place security systems designed to prevent unauthorized access to, or disclosure of, this information. Our security systems include physical, technical, and administrative information security controls, and we take commercially reasonable steps to secure and safeguard such Personal Information in accordance with Applicable Law.

7. Our Retention of Data.

We retain Personal Information for the period of time necessary to fulfill the purposes for which we obtained the Personal Information and consistent with Applicable Law. We use the following criteria to set our retention periods: (i) the duration of our relationship with you; (ii) the existence of a legal obligation as to the retention period; and (iii) the advisability of retaining the information in light of our legal position (for example, in light of applicable statutes of limitations, litigation, or regulatory investigations).

8. Accuracy and Minimization of Data.

We take reasonable steps (i) to maintain the accuracy of the Personal Information we process, and (ii) to limit the Personal Information that we process to that which is reasonably necessary for the purposes for which we obtained the information.

9. Accessing and Updating Your Information.

If you would like to review, correct, or update the Personal Information that you have provided to us, or if you would like to



request an electronic copy of this Personal Information for purposes of transmitting it to another company (to the extent Applicable Law provides you with this right to data portability), then you may make such requests by us as provided in Section 14 (Contact Us).

10. Your Choices Regarding Your Personal Information; Opting Out.

10.1 Discretionary Account Information.

To allow appropriate control over Personal Information, you can view, change, or update discretionary information that you have previously submitted either by contacting us as provided in Section 14 (Contact Us) below or by accessing your account if you are a Registered User.

10.2 Opt-Out of Marketing Communications.

If we choose to send to you, or you have elected to receive, bulletins, updates, or other marketing-related materials, we will provide you with the ability to decline – or "opt out" – of receiving such communications. Instructions for opting-out will be provided if and when we determine to send you such a communication. For example, if you no longer wish to receive email messages from us, you can opt out of this Service by either (i) following the "unsubscribe" instructions located near the bottom of each email message, or (ii) contacting us as provided in Section 14 (Contact Us) below. Please understand that we may still communicate with you in connection with administrative notices concerning any transactions, operation of the Platform and legal notices.

10.3 Online Activity Tracking

You can modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our website or Services may not function properly or be available. If you are visiting the Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising. Please visit <https://thenai.org/opt-out/mobile-opt-out/> for more information.

Your browser or device may include "Do Not Track" functionality; please note that we do not respond to such signals.

10.4 Geolocation Information

You may prevent providing your Geolocation Information by disabling the GPS and other applicable features in your device or browser settings.

11. Children and Teen Privacy.

Lorenzo's House is committed to providing a safe, secure, and supportive environment for children and teens who participate in our services. We will never knowingly request or collect personal information directly from anyone under the age of 18 without prior parental or guardian consent. Our website is not intended for use individuals under the age of 18, and we do not knowingly collect personal information from individuals under the age of 18 on the website. With parental consent, we may collect personal information from individuals under the age of 18 such as: name, contact information including address, email address and telephone number, age and other information related to your child's participation in Lorenzo's House Services and programs. This information allows us to fulfill a requested transaction and facilitate participation in programs and will be used solely for those purposes. Parents or guardians can revoke their consent and ask that information about their child be deleted by contacting us as provided in Section 14 (Contact Us). If we have inadvertently collected the personal information of an individual under the age of 18, a parent or guardian of that child may contact us at info@lorenzoshouse.org to request that we delete the information from our records or otherwise cease the use of that information.

12. Complaints.

We want your feedback. If you have a suggestions on how we can improve or complaints you would like us to address, please contact us at the address set out in Section 14 (Contact Us). If you are a California resident, you may report complaints to the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs. Other states may provide similar avenues for lodging complaints. Please check with your state's consumer protection authority.

13. Changes to this Privacy Policy.

From time to time, we may change this Privacy Policy for our business purposes and to comply with changes in Applicable Law. If we make any substantive or material changes, then we will communicate these changes to you by posting the updated Privacy Policy on the Platform and/or notifying you of the change via the Platform, email, or other methods. Your continued use of the Platform following such notice constitutes your agreement to follow and be bound by the updated



Privacy Policy.

14. **Contact Us.**

If you have any questions about this Privacy Policy, or our Platform, please contact us at: info@lorenzoshouse.org

15. **Relationship to Terms of Use and Other Contracts.**

This Privacy Policy must be read in conjunction with (i) other agreements into which you and Lorenzo's House may enter concerning the Platform (if any), (ii) our Website Terms and Conditions of Use; and our (iii) Code of Conduct. The provisions of our Terms of Use and Code of Conduct are incorporated herein. To the extent this Privacy Policy conflict with the our Terms of Use or Code of Conduct, this terms of this Privacy Policy shall control. Similarly, to the extent this Privacy Policy conflict with terms and conditions of any specific agreement you enter with us, the terms and conditions of such specific agreement shall control.

16. **Effective Date.**

The effective date of this Privacy Policy is December 21, 2023.