

POWER OF PARTNERSHIP, INC dba SafeGenerations

PRIVACY POLICY

Updated August 12th 2022

SafeGenerations is committed to protecting and respecting your privacy. We understand that you care about the use and storage of your **Personal Data** to protect your privacy. This policy explains the information we might collect, use, share, and keep about you, and may change from time to time so please check back here frequently. If you disagree with this Privacy Policy, please discontinue using our **Services**, including our website ("**Site**").

All terms of our [Terms of Use and Software License](#) are incorporated in this Privacy Policy as if fully set forth herein. All capitalized terminology in this Privacy Policy is defined in our **Terms**.

NOTHING PUBLISHED ON OUR WEBSITE(S) SHOULD BE CONSIDERED MEDICAL ADVICE. IF YOU HAVE AN EMERGENCY, PLEASE CONTACT 9-1-1. IF YOU HAVE A QUESTION OR CONCERN ABOUT YOUR OWN MEDICAL ISSUES, PLEASE CONTACT A QUALIFIED MEDICAL PRACTITIONER FOR ASSISTANCE.

SCOPE OF POLICY.

This Privacy Policy applies to:

- Visitors to our public **Site(s)**, including but not limited to <https://www.Safegenerations.org> and any of our affiliates' sites:
 - who request information or assistance by e-mail, social media, or telephone,

- who provide **User Content** to us such as feedback, comments, or reviews,
- who register for an account or fill out forms and provide them to us,
- who interact with us on social media,
- who participate in any contest or survey,
- Customers, subcontractors, and users of any of our **Services**, and
- Our affiliates and contractors.

The legal definition of **Personal Data** varies by location. If you are located in the U.S., the legal definition in Colorado applies unless superseded by U.S. Federal law or the law where you are physically located. If you are located outside the U.S., the legal definition where you are physically located applies.

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| CONSENT. |
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You are never required to provide us with the types of information covered by this Privacy Policy. If not provided, however, we may not be able to provide **Services** to you.

For individuals located outside of the European Union/European Economic Area, by accessing our **Site**, engaging our **Services**, and/or providing **Personal Data** to us, you do so voluntarily and are expressly opting-in and unambiguously consenting to the collection, use, retention, disclosure, and transfer, including cross-border transfer, of your **Personal Data** as explained in this Policy.

In the case of individuals located in countries where the General Data Protection Regulation (“**GDPR**”) applies, such as the European Union/European Economic Area (“EU/EEA”), you will be asked to ‘opt in’ to this Policy and our collection, use, retention, disclosure, and transfer of **Personal Data**. To the extent we transfer **Personal Data** to our office in the U.S., or to our **Business Partners**’ offices in the U.S., we make efforts to

comply with the GDPR. To the extent we transfer **Personal Data** to Canada, for the purposes set out in this Policy, we rely on the fact that Canada has been designated by the European Commission as a country that offers an adequate level of protection for **Personal Data**. If you live in the EU/EEA and have questions about this Policy, please contact us at legal@SafeGenerations.org.

NO USE BY MINORS.

We do not knowingly collect **Personal Data** from anyone under the age of majority in your location. Protecting children's privacy is especially important to us. It is our policy to comply with the Children's Online Privacy Protection Act (COPPA) and all other applicable laws. We do not offer **Services** through our **Site** and children under the age of majority are not eligible to provide us with **Personal Data**.

We ask that you carefully monitor your children's activities on the Internet. We believe that there is no substitute for proper parental supervision. If you believe your child has provided us with **Personal Data** or has attempted to engage our **Services** without permission, please contact us by email at legal@SafeGenerations.org and we will promptly delete such **Personal Data** and disable access to the associated account(s), if any.

If we receive a submission to any contest or survey that is from a minor, the minor's **Personal Information** will be deleted as soon as we learn that the submission comes from a minor and the contest or survey entry shall be void.

SHARING PERSONAL DATA/UNRELATED THIRD PARTIES.

We do not share **Personal Data** with unrelated third parties without providing you a choice. **Personal Data** that you provide to us while using our **Services**, including our **Site**, may be used to contact you for promotional offers,

marketing programs, or other communications from us, our vendors, contractors, affiliates, licensors, licensees, (other than you), and **Business Partners**.

If you provide us with **User Content** or post any such **User Content** on our social media pages (such as Instagram or Facebook), including without limitation, testimonials and videos, you are granting us the right and license to use that **User Content** for all commercial purposes. If you are accessing or using our **Services** as another's employee, volunteer, or contractor, please be aware that your employer or contractor may have authorized us to use and/or share your **Personal Data**.

SHARING PERSONAL DATA/BUSINESS PARTNERS.

We ask our **Business Partners** who have access to your **Personal Data** in connection with providing services to you to keep your **Personal Data** confidential. They are not permitted to use your **Personal Data** for any other purpose than to carry out the services they are performing or to market products or services to you as long as you have the option to opt out of that communication.

When we make **Personal Data** available to our **Business Partners**, we will not share with them any more information than is necessary; and we will use reasonable efforts to ensure, by contract or otherwise, that they use your **Personal Data** in a manner that is consistent with this Privacy Policy.

INFORMATION WE MAY COLLECT FROM YOU.

We automatically collect **Personal Data** when you access our **Site**, or otherwise engage our **Services**. The types of information we collect may include:

- Networking and device information, such as your type of browser, IP address, language settings, and the version of your operating system.
- Information regarding your activity on our **Site**, such as access time, pages viewed, the website from which you accessed our **Site**, and your use of any hyperlinks on our **Site**.
- Information regarding the dates and subject-matter of your engagement of our **Services**.
- Information collected by cookies, web beacons, and other tracking technologies, including Internet service provider (ISP), Mobile Advertising ID, media access control (MAC) address, or identifiers associated with such technologies.
- Location information in accordance with your device permissions.

We may also collect data about you from third-party sources. E.g.,

- Information collected from our **Business Partners**, retailers, or distributors,
- Information collected from other clients or referral sources,
- Information collected from third-party social media and communication services such as Facebook, Twitter, Google, and Instagram that you may use to interact with our **Site** or engage our **Services**, but we will only collect such information in accordance with the authorization and privacy settings you establish in those services.
- Information from unaffiliated service providers, including, without limitation and by way of example only, analytics companies, advertising networks, and consumer data resellers.

We may also derive information or draw inferences about you based on the other types of data we collect. For example, we may infer your location based upon your IP address or that you are interested in engaging a particular **Service** based upon your browsing behavior on our **Site**.

We may collect and process the following types of **Personal Data** about you.

If you download marketing collateral or contact us for information about our **Services**, we collect and maintain **Personal Data** that may include your name, IP address, and contact information such as email address and/or telephone number. If you engage our **Services**, respond to a survey or contest, or otherwise consent in advance, we or our **Business Partners** will collect and maintain **Personal Data** that may include your name, title or position, employer, mailing address, email address, social media username, IP address, credit card information, PayPal® user name (if any), billing information, event information, and telephone number.

We use your **Personal Data** to take necessary steps to respond to a request and/or to perform **Services** requested. In addition, direct marketing is necessary for the legitimate business interests we are pursuing.

You may unsubscribe from emails at any time by clicking on the “unsubscribe” link in the emails you receive.

Your **Personal Data** is available to our employees, Affiliates, and **Business Partners** with a legitimate business need, independent contractors who are working with you, our marketing team, fulfillment team, operations team, survey processors, contest judges, customer relationship management software providers (CRM), and credit card processors.

We only collect **Personal Data** required for our legitimate business purposes. We do not request or require you to provide any special categories of **Personal Data** including, for example, genetic data, biometric data, or information relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, or sexual

orientation. If we become aware of any such data having been submitted to us, we will, where reasonably practicable, endeavor to delete it or, if such information is required for the **Services** we are providing, we will anonymize or pseudonymize the **Personal Data** after providing the **Services** requested.

COOKIES.

A “Cookie” is a small amount of data generated by a website and saved by your web browser.

When you visit our **Site** or purchase our **Services**, we use the below types of Cookies. Should the types of Cookies change, we will endeavor to update this Privacy Policy to reflect those changes. If you are located in the U.S., use of our **Site** constitutes consent to our use of the Cookies detailed below. For more information on how Cookies function and disabling Cookies, consult your browser’s “Help” button.

- **Strictly Necessary Cookies.** These Cookies enable you to browse the **Site** and use features. Without these Cookies, services such as e-billing and shopping carts cannot be provided.

| Key | Value | Valid Through |
|---------------------|---------------------------------|---------------|
| Safegenerations.org | viewed_cookie_policy | 11 months |
| Safegenerations.org | cookieinfo-checkbox-necessary | 11 months |
| Safegenerations.org | cookieinfo-checkbox-functional | 11 months |
| Safegenerations.org | cookieinfo-checkbox-performance | 11 months |
| Safegenerations.org | cookieinfo-checkbox-analytics | 11 months |
| Safegenerations.org | cookieinfo-checkbox-others | 11 months |

YOU MAY DISABLE COOKIES IN YOUR BROWSER SETTINGS. PLEASE KEEP IN MIND, DISABLING ALL COOKIES MAY IMPAIR PRODUCT FUNCTIONALITY.

SECURITY.

WHERE WE STORE YOUR PERSONAL DATA

We use servers in the United States to process and store **Personal Data**.

While no server can be completely secure, we make reasonable efforts to ensure that these servers are kept in a secure, locked environment with restricted access and we have on our own, and in conjunction with the third parties who operate the servers, established physical, electronic, and procedural safeguards to protect your information as are standard in our industry and as are reasonable based on the size of our company.

Personal Data stored by us may be accessed and processed by staff operating outside your jurisdiction, who work either for us or for one of our **Business Partners**. This staff may be engaged in fulfilling your order or request, processing a payment, and/or providing support services to us. We require these **Business Partners** to agree to treat your **Personal Data** securely and in accordance with this Privacy Policy and applicable law.

We have implemented a variety of technical and organizational measures to protect **Personal Data** from loss, misuse, unlawful processing, unauthorized access, disclosure, copying, alteration, and destruction. These include limiting access to the databases to a limited number of authorized staff, who are required to enter into non-disclosure agreements before access is afforded to them and who can only access the database for legitimate pre-authorized purposes. Further, access to the databases is password protected. We also have in place audit logs, intrusion detection software, anti-virus or malware protection, and system integrity tools to further protect data stored on these databases.

PASSWORDS

Where we have provided you (or where you have chosen) a password that enables you to access certain portions of our **Services**, you are responsible for keeping this password confidential. You are responsible for protecting your account by not sharing your password with anyone.

HACKERS

While we make reasonable and industry-standard efforts to ensure the integrity and security of our network and systems using the standard measures in place through our **Site** host, we cannot guarantee that such security measures will prevent third-party “hackers” from illegally obtaining this information.

We are not responsible for circumvention of any privacy settings or security measures contained in our **Services**, including the illegal acts of third parties (such as criminal hacking).

We disclaim any and all liability for disclosure of any information obtained due to errors in transmission or the unauthorized acts of third parties as more specifically detailed in our Disclaimers. **ANY TRANSMISSION IS AT YOUR OWN RISK.**

THIRD-PARTY WEBSITES

Our **Services** may, from time to time, contain links to and from the websites of third parties. We only link to the home page of third-party content unless we have permission to link to an embedded page. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any **Personal Data** that may be collected through these websites or services. This includes any posting you may make on our social media page(s); which page(s) are controlled by such third-party social media sites.

We urge you to exercise care when providing information to anyone and to

check the policies and terms of all third-party websites before you submit any **Personal Data**.

ADVERTISING

We may use third-party advertising companies to serve ads when you visit our **Site** or use our **Services**. Such third-party companies may use information (not including your name, address, or e-mail address) about your visits to this and other websites to provide advertisements on sites, goods, and services that may be of interest to you. If you would like more information about this practice, and to know your choices about not having this information used by these companies, please review your rights at the [Network Advertising Initiative](#).

SOCIAL MEDIA

When you use features such as social networking, chat rooms, or forums, you should take precautions not to submit any **Personal Data** that you do not want to be seen, collected, or used by others. If you submit any **Personal Data** (that may be included in **User Content**) as part of a survey or contest, please consult our [Terms](#) for our rights to use that **User Content**.

Our **Services** include features from social media websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy, terms, and other policies of the companies providing those features.

RETENTION.

The amount of time we hold your **Personal Data** will vary but will not be kept for longer than is necessary for the purposes for which it is being processed. We will retain your **Personal Data** in accordance with the following criteria:

If you request information from us, we will retain your **Personal Data** solely for the legitimate business purpose of responding to your request or inquiry and will maintain that information to communicate with you regarding our other **Services**. You may opt out of such communications at any time and you will be provided with that opportunity to “unsubscribe” within each communication. If you request deletion of your **Personal Data**, we will pseudonymize or anonymize your **Personal Data** so that it cannot be connected to you.

If you have accessed, downloaded, engaged, licensed, or leased **Services** from us or have provided us with any **User Content** (for e.g., a testimonial or contest submission), we will retain your **Personal Data** for as long as we are offering, distributing, selling, licensing, or leasing **Services** in order to provide you with information regarding those **Services**. You may opt out of such communications at any time and will be provided with that opportunity to “unsubscribe” within each communication. If you request deletion of your **Personal Data**, we will pseudonymize or anonymize your **Personal Data** so that it cannot be connected to you.

If you provide us with a username for online payments or credit card information, we, or our **Business Partners**, such as credit card processors, will maintain that information for as long as we are conducting business together (for instance, if you have an account with us) in order to accept or send automatic payments. If you provide such information for one-time payments, we will delete such information as soon as the one-time transaction is completed.

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| YOUR RIGHTS. |
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You have certain rights in relation to the **Personal Data** we process. These rights to access, correct, amend, or delete **Personal Data** vary by location and only the rights available to you in your physical location will be enforceable by you under this Privacy Policy.

Typically, you have the following rights:

- The right to access your **Personal Data** unless access is subject to a legal exception.
- The right to have your **Personal Data** corrected if it is inaccurate or incomplete.
- The right to have your **Personal Data** not processed.
- The right to have your **Personal Data** erased if it is no longer necessary or required in relation to the purposes and there are no other overriding legitimate grounds for us to continue processing it.
- The right to opt out if your **Personal Data** is to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or you subsequently authorized.
- The right to complain to a supervisory authority if you think your rights have been infringed.
- You may also have the right to request that a business disclose the categories or details of **Personal Data** collected.

To exercise your rights, you may make an inquiry by sending an email request directly to the Data Compliance Officer at legal@SafeGenerations.org. In some cases, you may need to discuss deletion with your employer if you access our **Services** through your employer.

We will respond to your request in accordance with the laws that apply to you. When you make your request, we will maintain your request and related

Personal Data as we maintain other **Personal Data** in order to respond, after which time we will delete the **Personal Data** provided in the request.

Access requests are free; however, we reserve the right to charge a reasonable fee to comply with your request when your request is unfounded or excessive.

TRANSFER OF PERSONAL DATA OUTSIDE OF EUROPE

In the case of individuals located in countries where the General Data Protection Regulation (“**GDPR**”) applies, to the extent we transfer **Personal Data** to our office, or our **Business Partners’** offices, in the U.S., we make efforts to comply with the GDPR. To the extent we transfer **Personal Data** to Canada, for the purposes set out in this Privacy Policy, we rely on the fact that Canada has been designated by the European Commission as a country that offers an adequate level of protection for **Personal Data**.

If we transfer **Personal Data** relating to individuals located in the EU or the European Economic Area to third parties, we will have in place Data Transfer Agreements based on the EU model clauses. We will also provide reasonable technical and organizational measures to protect **Personal Data** from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access.

CALIFORNIA USERS.

Under California’s “Shine the Light” law, and once per year, California, U.S. residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from the seller the client information shared, if any, with other businesses for their own direct marketing uses.

If applicable, this information would include the categories of client information and the names and addresses of those businesses with which we shared client information during the immediately prior calendar year. If you believe this law applies to you, please send an e-mail message to Data Compliance Officer at legal@SafeGenerations.org with "Request for California Privacy Information" in the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response only if the law applies to you. **We do not share any of your information provided in any seminar or workshop with other businesses for direct marketing.**

We will maintain your request and the client information you provided in that request for ninety (90) days to ensure you do not have any follow-up questions. After that time, the information associated with your request will be deleted. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

If you are a California resident, the California Consumer Privacy Act ("CCPA") requires us to disclose the following information with respect to our collection, use, and disclosure of **Personal Data**.

- In the past twelve (12) months, we have collected the following categories of **Personal Data**: geolocation data and IP addresses.
- We collect **Personal Data** for the business purposes of providing promotional offers regarding our **Services** or the products of **Business Partners** and processing purchases.
- We collect **Personal Data** from (1) your communications with us, (2) social media that links to our username(s), (3) your downloads of our marketing collateral, (4) your engagement of our **Services**, and, (5) visitors to our **Site**.

- In the preceding twelve (12) months, we have disclosed the categories of **Personal Data** only as specified in this Policy.
- We may share your **Personal Data** with third parties as specified in this Policy at [Sharing Personal Data/Unrelated Third Parties](#) and [Sharing Personal Data/Business Partners](#).
- We do not sell your **Personal Data**.

If you reside in California, you have the right to:

- request access to your **Personal Data**,
- request additional details about our information practices, including the sources of collection, the categories of **Personal Data** that we share for a business or commercial purpose, and the categories of third parties with whom we share your **Personal Data**,
- request access to the **Personal Data**, including the categories of such information, we have collected about you in the last twelve (12) months,
- request deletion of your **Personal Data** (subject to certain exceptions),
- opt out of sales of **Personal Data**, if applicable,
- request access to the specific pieces of **Personal Data** we have collected about you in the last 12 months,
- request access to the specific **Personal Data** shared with other businesses for their direct marketing.

You may make these requests by calling 800-333-4234 or emailing us at legal@SafeGenerations.org with "Request for California Privacy Information" in the subject line and in the body of your message. After

submitting your request, please monitor your email for a verification email. We will provide the requested information to you at your e-mail address in response only if the law applies to you.

If this law is applicable to you, we are required by law to verify your identity prior to deleting your **Personal Data** in order to protect your privacy and security. If you make a request to delete your **Personal Data**, certain of our **Services** may no longer be available to you.

We describe how California consumers can exercise their rights under the CCPA above. Please note that you may designate an authorized agent to exercise these rights on your behalf by providing written materials demonstrating that you have granted the authorized agent power of attorney. Please note that if an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your **Personal Data**. We will not discriminate against you if you choose to exercise your rights under the CCPA.

We will maintain your request and the **Personal Data** you provide in that request for ninety (90) days to ensure you do not have any follow-up questions. After that time, the information associated with your request will be deleted.

Please be aware that not all businesses are required to comply with California's Consumer Privacy Act ("CCPA") requirements, and not all information sharing is covered by such CCPA. Only information covered will be included in our response.

COMPLAINTS.

If you have a complaint regarding this Privacy Policy or how your **Personal Data** is being maintained, used, or processed, you should first contact our Data Compliance Officer, whose contact details appear below:

Attention: Data Compliance Officer

legal@SafeGenerations.org

U.S. Tel: 833-723-3767 (ask for the Andrea Robideau, Data Compliance Officer)

If you are located in the European Union/European Economic area and are still concerned that we are not complying with our obligations under the General Data Protection Regulation (“**GDPR**”) or another applicable regulation or statute, and/or that we are not handling **Personal Data** responsibly and in line with good practice, you may raise a concern with the UK Information Commissioner’s Office (“**ICO**”). Concerns may be reported online at: <https://ico.org.uk/concerns/handling/> or by calling 0303 123 1113.

CONTACT.

Questions, comments, notices, and requests regarding this Privacy Policy are welcomed and should be emailed to our Data Compliance Officer at legal@SafeGenerations.org. Please make sure that you identify the **Site** and/or **Services** through which you submitted **Personal Data** to enable us to identify your records. We will respond to your communications within thirty (30) days unless your request involves information that requires significant and/or unusual research.

CHANGES TO PRIVACY POLICY.

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or provided when you next start a downloaded application or access an online software application or when you access our **Site**. The new terms may be displayed on-screen and you may be required to read and accept them to continue your access, download, license, lease, and use of our **Services**.