

# **PRIVACY POLICY**

## **People First Charitable Foundation Privacy Notice**

Effective Date: 02/07/2022

The People First Charitable Foundation (“People First” or “we”) was established to provide funding to charities active in the communities in which employees of Edgewood Partners Insurance Center (“EPIC”) live and work. Our goal is to help those in need. In helping to insure against the unexpected, our foundation helps restore peace of mind for those experiencing difficulties which are central to our giving strategy. In furtherance of these goals, People First is committed to protecting your privacy. This Privacy Notice describes how People First collects, uses, and discloses personal information. This Notice applies to any personal information you provide and any personal information that we collect from other parties. Please note that we will not sell, share, or trade any donors’ names or personal information with any third party other than our service providers, nor will we send mailings to any donors on behalf of other organizations that are linked on this website.

### **When do we collect your information?**

People First collects personal information when:

- you contact us or we process a transaction for you
- you register on our website or email distribution lists
- you RSVP to or attend our events
- you interact with us through social media
- you donate money through this website

### **What information do we collect?**

In the course of interacting with you or processing your donation, we may collect information from you or other sources, which may include the following:

- Name and contact information (e-mail address, mailing address, phone number, mobile number, etc.)
- Payment information when making a donation through this website, but note that we may use a third-party payment service to process payments made through this site, and we will retain such payment information only as long as necessary to process the transaction

### **How do we use your personal information?**

We process personal information that is provided by you in order to process your donation, register you for events, add you to our mailing lists, respond to your inquiries, or to perform any other service for you with your consent. The processing of your personal information depends on the type of services we provide, applicable laws, regulatory guidance, and professional standards. We may also use your personal information for our business purposes, such as data analysis, audits, recordkeeping, developing new fundraising campaigns, enhancing the website, improving our services, identifying trends, optimizing your experience on the website, and determining the effectiveness of our fundraising campaigns.

All processing of your personal information is justified under a “lawful basis” for processing, including the following:

- your consent
- processing is necessary in order to enable you to use our website or process your donation
- processing is necessary for us to comply with legal obligations
- processing is in our legitimate commercial interest, except that our interest may not override your fundamental rights or freedoms
- In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

### **Do we collect information from children?**

People First does not knowingly collect information from children who have not reached the age of consent under relevant data privacy laws. If we learn that we have collected personal information from a child who has not reached the age of consent, we will delete it immediately.

### **What Information Do We Collect Through Automatic Data Collection Technologies?**

As you navigate through and interact with this 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 this website, including traffic data, logs, 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.

The information we collect automatically is only statistical data that helps us improve our website and deliver a better and more personalized service, including by enabling us to:

- Estimate audience size and usage patterns.
- Store information about your preferences, allowing us to customize our website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the 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 this 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 this website.

- **Web Beacons.** Pages of this website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or that you provide to us.

### **How long do we retain your personal information?**

We collect and process personal information in connection with providing the services on this website and will only retain such information for as long as is necessary to perform the services as outlined above, in accordance with applicable law.

### **Do we disclose your personal information?**

People First does not share Personal Information with third parties for direct marketing purposes. People First may share information about you with others if you give us permission or direct us to share the information. We may also need to share your personal information with third parties that provide operational services on our behalf (such as website hosting, information technology and infrastructure, data analytics, e-mail delivery, credit card processing, auditing, or other services) or that assist us in providing the services offered on this website.

We may also disclose your personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

People First may also disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request, to enforce or apply our Terms of Use, or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of People First or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

### **How do we protect your information?**

People First protects personal information using physical, electronic, and procedural safeguards that are specifically designed to meet or exceed the requirements of applicable laws. All of our employees receive training on the importance of protecting personal information, and only authorized employees have access to personal information. Subcontractors and agents are contractually bound to maintain protection of personal information and are not permitted to use the information for any unauthorized purpose.

### **What choices do you have about your personal information or our communications?**

You have certain rights related to the processing of your personal information, including:

- You have the right to unsubscribe from our communications by clicking the “unsubscribe” link in our marketing emails or by contacting us.
- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

### **Website and External Privacy Links**

This Privacy Notice describes the data privacy and protection policies of People First. People First is 501(c)(3) corporation that was established by EPIC. If you would like to review EPIC’s Privacy Policy, you may do so by clicking this link [www.epicbrokers.com](http://www.epicbrokers.com).

In addition, insert website address may contain links to other websites. This Privacy Notice only addresses your information that is received by People First. You are encouraged to review the privacy policies of each website you visit.

### **Changes to this Statement**

This Notice may be changed at any time. Unless stated otherwise, all changes that occur will become effective immediately. The date the privacy policy was last revised is identified at the top of the page. By continuing to access this website, you agree to accept all terms and conditions outlined in this Notice.

### **Questions or Complaints**

If you have any questions or complaints about this Notice, or about our data privacy or security policies in general you may email your comments to [privacy@epicbrokers.com](mailto:privacy@epicbrokers.com) or contact us by mail at EPIC Corporate Headquarters, Attention: Privacy Officer, 1 California Street, Suite 400, San Francisco, California 94111, or by telephone at 1-800-345-7242.