

FrontStream Privacy Policy - BiddingForGood

The privacy of your personal information is very important to us. As such, FrontStream ("FrontStream," "we," or "us") presents this Privacy Policy ("Policy") that describes how we collect, use, and disclose information, including through the websites, mobile applications, and other online services and products that link to or post this Policy (collectively, the "Services"). Please read the entire Privacy Policy before using our Services.

Accountability for our compliance with this Policy rests with our Privacy Officer, even though other individuals within FrontStream may also have responsibility for some day-to-day collection and processing of personal information. Other individuals within FrontStream may be delegated to act on behalf of the Privacy Officer.

"Personal information" means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable. This policy applies to individuals.

1. Information We Collect

When you visit our Services, we will not collect personal information about you unless you provide us that information voluntarily. In this Policy, "personal information" means information about an identifiable individual. We may ask you for some or all of the following types of personal information when you register with, access or use our Services, respond to any surveys or polls, or directly contact us with questions or feedback:

- Contact information, such as first and last name, e-mail address, postal address, and telephone number;
- User name and password;
- Demographic information, such as age information and gender;
- Payment information, such as credit card number and expiration date;
- Geolocation information;
- Communications preferences;
- Correspondence and other information that you send to us; and
- Additional information as otherwise described to you at the point of collection or pursuant to your consent, and as required or permitted by applicable law.

We also may collect certain information automatically when you visit the Services, including:

- Your browser type and operating system;
- Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area;
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- Other unique identifiers, including mobile device identification numbers;
- Sites you visited before and after visiting the Services;
- Pages you view and links you click on within the Services;
- Information collected through cookies, web beacons, and other technologies;
- Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were opened or forwarded; and
- Standard Server Log Information.

We may use cookies, pixel tags, and similar technologies to automatically collect this information. Cookies are small bits of information that are stored by your computer's web browser. Pixel tags are very small images or small pieces of data embedded in images, also known as "web beacons" or "clear GIFs," that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. By using the Services, you consent to our use of cookies and similar technologies. You can decide if and how your computer will accept a cookie by configuring your preferences or options in your browser. However, if you choose to reject cookies, you may not be able to use certain online products, services, or features on the Services.

Some web browsers may transmit "do-not-track" signals to the websites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, FrontStream currently does not take action in response to these signals. If and when a final standard is established and accepted, we will reassess how to respond to these signals.

2. Use of Information

We may use information that we collect through the Services for a variety of purposes, including to:

- Provide you with the products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you;
- Customize and personalize your use of the Services;
- Contact you via e-mail and otherwise about promotions, products, services, surveys and events that we think might be of interest to you, including with respect to our Services, auctions in which you have participated, and products or services you have bid on or placed a “watch” at an auction;
- Contact you with surveys, legal notices, and other information that may be relevant to your use of the Services;
- Maintain or administer the Services, perform business analyses, or for other internal purposes to improve the quality of our business, the Services, and other products and services we offer; and
- As otherwise described to you at the point of collection or pursuant to your consent, and as required or permitted by applicable law.

3. Sharing of Information

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

- *Corporate Parents, Affiliates, and Subsidiaries, or Associated Entities (for Canadian Clients).* We may share your information with our corporate parents, subsidiaries, and other affiliated entities for the purposes referred to in this Policy.
 - *Associated Entities (for Australian Clients).* We may share your information with associated entities for the purposes referred to in this Policy.
- *Service Providers.* We may share your information with service providers that perform certain functions or services on our behalf, such as to host the Services, manage databases, host a store or other e-commerce platform, perform analyses, or send communications for us.
- *Select Business Partners.* As a facilitator of online fundraising events and donation requests, we must be able to provide your personal information to the organization holding the fundraising event, and with respect to winning

bidders, to the vendors who have donated the items purchased (if required). However, FrontStream is not responsible for the privacy practices of these business partners.

- *Other Parties When Required By Law or as Necessary to Protect the Services.* We may disclose your information to third parties in order to protect the legal rights, safety, and security of FrontStream, our corporate parents, affiliates, and subsidiaries, and the users of our Services; enforce our Terms of Use; prevent fraud (or for risk management purposes); and comply with or respond to law enforcement or legal process or a request for cooperation by a government or other entity, whether or not legally required.
- *In Connection With a Transfer of Assets.* If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger, acquisition or business transfer, or in the event of bankruptcy, we may transfer your information to one or more third parties as part of that transaction.
- *Other Parties With Your Consent or as Authorized by Law.* We may share information about you with third parties when you consent to such sharing (including when you post information to a public area of the Services, such as a chat room, discussion board, forum, blog, or other community tool) and otherwise as required or permitted by applicable law.
- *Aggregate Information.* We may disclose to third parties information that does not describe or identify individual users, such as aggregate website usage data or demographic reports.

We may allow third parties to place and read their own cookies, web beacons, Local Shared Objects, and similar technologies to collect information through the Services. For example, our third-party service providers may use these technologies to collect information that helps us with traffic measurement, research, and analytics.

4. Data Security

We maintain security procedures to help protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of the information you submit to us. We protect personal information with organizational, physical, mechanical and electronic safeguards appropriate to the sensitivity of the information, including encryption and secure server technology where appropriate. Please note that no

data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect your information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information.

You are responsible for maintaining the confidentiality of your account password and for any access to or use of the Services using your password, whether or not authorized by you. Please notify us immediately of any unauthorized use of your password or account or any other breach of security.

Your personal information will be retained only as long as necessary for the fulfilment of the purposes referred to in this Policy.

5. Children's Privacy

The Services do not knowingly collect, use, or disclose personal information from children under the age of 13 without prior parental consent, except as permitted by the Children's Online Privacy Protection Act ("COPPA") or other applicable law. If we learn that we inadvertently have collected identifying personal information from an individual under the age of 13, we will promptly delete that information from our system.

6. Social Networking Services

FrontStream has worked with certain third-party social media providers to offer you their social networking services through our Services. For example, you can use third-party social networking services, including but not limited to Facebook, Twitter, LinkedIn and others to share information about your experience on our Services with your friends and followers on those social networking services. These social networking services may be able to collect information about you, including your activity on our Services. These third-party social networking services also may notify your friends, both on our Services and on the social networking services themselves, that you are a user of our Services or about your use of our Services, in accordance with applicable law and their own privacy policies. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services.

7. Privacy Policy Updates

We may modify this Policy at any time by posting revisions to the Services or other appropriate notice. Your continued use of the Services after any modification to the Policy will constitute your acceptance of the new terms and conditions of the Policy.

8. Links to Third Party Sites and Services

The Services may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by FrontStream. Such links do not constitute an endorsement by FrontStream of those other websites, the content displayed therein, or the persons or entities associated therewith. This Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

9. International Users

By using the Services, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories. Please note that privacy laws in such jurisdictions may differ from those of your jurisdiction, and that your personal information may be accessed by law enforcement authorities or the courts in such jurisdictions. You may obtain information and address questions about the privacy policies and practices relating to handling of your personal information outside of your jurisdiction by contacting our Privacy Officer using the contact information below.

For Australian Clients. In this case, FrontStream will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information.

10. Your California Privacy Rights

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. To obtain such information, please e-mail your request to webmaster@FrontStream.com.

11. Updating Communications Preferences (Opt out)

You may choose to receive promotional offers, newsletters, and similar communications from us regarding products and services of FrontStream and our affiliated organizations. You may opt out of receiving such communications from us by communicating your preference to us using the contact information provided at the end of this Policy, or in the case of e-mails, by clicking on the opt-out or “unsubscribe” link included at the bottom of the e-mails you receive.

12. Withdrawal of Consent

You can withdraw consent at any time to collection, use or disclosure of your personal information, subject to legal or contractual restrictions and reasonable notice. You may do so by using the contact information provided at the end of this Policy. We will inform you of any implications of such withdrawal. We may be unable to remove information to the extent that it is permitted or required to be retained by applicable law or document retention and data backup or disaster-recovery policies, or if removal is not practicable due to technological reasons.

13. Privacy Complaints for Australian Clients

If you have a complaint about how we collected or handled your personal information, please contact us (see details below). We will endeavor in the first instance to deal with your complaint and take action to resolve the matter. If your complaint cannot be resolved at the first instance, we will ask you to lodge a formal complaint in writing, explaining the circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how you believe your complaint should be resolved. We will acknowledge receipt of your formal complaint and indicate the timeframe that you can expect a response. We will endeavor to resolve the complaint as quickly as possible, but if the matter is complex and our investigation may take longer, we will let you know when we expect to provide our response.

If you are unhappy with our response, you may refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Victorian Health Services Commissioner or the Australian Communications and Media Authority.

14. Contact Us

You may submit a written request to access or update your personal information, or if you have questions or concerns about the collection, use, disclosure, amendment or deletion of your personal information.

All correspondence should be sent to the following address:

Privacy Officer

e-mail to webmaster@FrontStream.com