



## TreeTop Commons, LLC Privacy Policy

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TreeTop Commons, LLC (“*TreeTop*,” “*We*,” or “*Us*”), creates online software, including Collaboratory and NobleHour, to strengthen communities by organizing and reporting volunteer work, community engagement, and collaborations. The use of information or data collected through our service is used to deepen the work being done and will be limited to the purpose of providing the service for which We have been engaged.

We respect the privacy of our users and the privacy of your data. This Privacy Policy covers our collection, use, and disclosure of information We collect through our website and services, and personal data We obtain from our social media platforms. This Privacy Policy does not apply to any third-party site or service linked to or from our website or social media channels or to any website or service recommended or referred to by our website or staff. Please read this Privacy Policy carefully to understand our policies and practices regarding your personal data and how We will treat it.

***By submitting personal data to Us and/or by using our website, you give your consent that all personal data submitted by you may be processed by Us in the manner and for the purposes described below.***

***If you do not want Us to process your personal data, please do not provide it, but note that you may not be able to take full advantage of our software and services as a result.***

### 1. **Personal data We collect directly from you**

We collect personal data when We market our software and services, interact with our users, store users’ data, and provide our software and services. For example, We may collect personal data from you when you request a demo or evaluation, sign up for newsletters, enter promotions, interact with Us on our social media channels, order software and services, submit content or send Us feedback. When you sign up for an account, We may collect your name, email address, user name, password, alternative forms of payment, address book information for individuals or organizations with whom you may choose to volunteer, your hours spent volunteering, and other details that you choose to maintain in your account. We may also collect any personal data you share with Us through online forms, email, facsimile, live chat, telephone or social media channels.

***When you submit personal data, you are transferring such personal data into the United States, and you hereby consent to such transfer.***

***If you do not want Us to collect this personal data, please do not provide it, but note that you may not be able to take full advantage of our software and services as a result.***



## 2. **Personal data We collect from other sources**

We may collect information about you from other sources, including third parties, and combine this information with personal data provided by you. This helps Us to update and expand our records, provide services that may be of interest to you, and identify potential new customers. In particular, We may collect business contact information, including mailing address, job title, email address, phone number, and social handles.

We may also collect personal data about you from public sources such as news sites or social media, or private sources such as directly from other users. This allows our users to track collaborations and volunteer work. We may add this personal data to the information We collect on you.

In some cases, We are provided personal data from an organization that uses Single Sign On (SSO) services with Us. This allows Us to create and provision accounts so that organizational login credentials can be used to sign into our services without individually creating accounts. This data can include name, title, job function, business name, business address, business e-mail address, business phone number, and/or electronic signatures.

## 3. **Device and usage data**

**a. Log files.** As is true of most websites, We gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

**b. Software and services use.** We may use technologies to automatically collect personal data from you when you use our software and services, including how you use our software and services and your search queries. We collect this personal data to provide you information and to perform benchmarking based upon users' usage of the software and services.

**c. Device information.** We collect personal data about the device you use to access our website and our software and services, including the hardware model, operating system and version, unique device identifiers, and mobile network information. We may associate your device identifiers and phone number with the account(s) you open with Us.

**d. Location information.** When you use our software and services, We may collect and process personal data about your actual location. We may use IP address, beacons, GPS, and other sensors that provide information about nearby devices, Wi-Fi access points, and cell towers.



e. **Local storage of information.** Our Software and Services may collect and store personal data locally on your device, including browser web storage, local drive storage and application data caches.

#### 4. **Cookies and other tracking technologies**

TreeTop or service providers working on TreeTop's behalf may use technologies such as cookies, beacons, tags, and scripts to analyze trends, administer the software and services, track users' movements around the website, and gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. We use cookies to help Us provide you with a more personalized experience.

Users can control the use of cookies at the individual browser level. *If you reject cookies, you may still use our website, but note that you may not be able to take full advantage of our software and services as a result.*

#### 5. **How We use the information We collect**

We may use personal information to provide the services you've requested, including services that display customized forms, documents, reports, and newsletters. We may also use personal information for auditing, research and analysis to operate and improve our website and services. We may use your personal data to inform you about our software and services and to otherwise perform marketing activities.

We may use third parties to assist Us in processing your personal information, and We require that such third parties comply with our Privacy Policy and any other appropriate confidentiality and security measures. We may use certain other information collected from you to help diagnose technical problems, administer our website, and improve the quality and types of services delivered.

We may also share your personal data with third parties who conduct marketing studies and data analytics on our behalf and perform advertising services. These third parties may combine your information with the information of other consumers for purposes of conducting these studies and/or analytics. For instance, We use Google Analytics to analyze site traffic to our website regarding the gender, age, and interests of visitors, and adapt our content to better reflect their needs. Although this information is collected through your Google Ad Settings, it is not provided to Us in a personally identifiable format.

*You may nevertheless opt out of the Google Analytics reporting features by following the instructions at this link: <https://tools.google.com/dlpage/gaoptout/>.*



Any information We collect is not shared with or sold to other organizations for commercial purposes, except to provide products or services you've requested, when We have your permission, or under the following circumstances:

- as required by law, such as to comply with a subpoena, legal proceedings, or similar legal process;
- when We believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- in certain situations, We may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- to investigate potential violations of TreeTop's Acceptable Use Policy;
- to any other third party with your prior consent to do so;
- if TreeTop is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

#### 6. **“Do not track” requests**

Your internet browser and mobile device may allow you to adjust your browser settings so that “do not track” requests are sent to the websites you visit. We do not process “do not track” (DNT) signals. Our third party service providers also may not respond to DNT signals.

#### 7. **Third-Party websites**

Our website may include links to other websites whose privacy practices may differ from those of TreeTop. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

#### 8. **Social Media features**

Our software and services may include social media features or provide direct links to our social media channels. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. We may also link to our software and services from within social media to permit you to access and further share our software and services and post to other websites using your social media login credentials. Social media features and widgets are either hosted by a third party or hosted directly on our software and services. Your interactions with these features are governed by the privacy policy of the company providing it.



## 9. **Preferences and opting-out**

Our software and services provide users with the opportunity to opt-out of receiving specific types of communications from Us. If you have previously signed up to receive information about our software and services, you may unsubscribe or opt out of all future marketing communications from Us that do not relate to software and services you have already accessed by sending an email to [privacy@treetopllc.com](mailto:privacy@treetopllc.com) or by clicking the unsubscribe link on any email marketing communication you receive.

## 10. **Accessing and updating personal data**

Upon request, We will provide you with information about whether We hold, or process on behalf of a third party, any of your personal information. When you use our website or services, We make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is no longer needed for legitimate business purposes. You may update your account information by logging into your account. When requests come to TreeTop with regard to personal information, We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. We retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. In any case where We provide information access and correction, We perform this service free of charge, except if doing so would require a disproportionate effort. We will respond to these requests within a reasonable timeframe.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## 11. **Family Educational Rights and Privacy Act**

Use of our website does not affect your rights under the Family Educational Rights and Privacy Act (“**FERPA**”). Pursuant to FERPA, any school that receives funds under an applicable program of the U.S. Department of Education is required to protect the privacy of student education records. In a nutshell, FERPA requires schools to obtain written permission from parents or students prior to disclosing a student’s records. However, certain exceptions allow schools to disclose information internally, and for certain specified reasons, without obtaining consent. For more information on FERPA, please visit <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>.



TreeTop maintains strict standards with regard to personally identifiable information about students (“*Student PII*”) to ensure compliance with FERPA. We will not share or sell FERPA-protected information, or re-use it for any other purposes, except as directed by you or permitted by FERPA. In addition, We have implemented security policies and procedures reasonably designed to protect Student PII from inappropriate disclosure, destruction or modification. TreeTop staff have been specifically trained to ensure the security and confidentiality of such records. If you believe Student PII contained on our website is incorrect or inappropriately displayed, or if you would like to gain access to Student PII stored on our website belonging to you or your children, please email Us at [privacy@treetopllc.com](mailto:privacy@treetopllc.com).

## 12. **Data provided by Educational Entity**

Notwithstanding anything in this Privacy Policy to the contrary, the following provisions shall apply to data of whatever type provided directly by an educational agency (“*Educational Entity Data*”), school or university (each an “*Educational Entity*”). All Educational Entity Data containing Student PII or records which were the property of the student prior to its transfer to our website shall continue to be the property of the student under the control of the Educational Entity.

We will hold all Educational Entity Data in the strictest confidence and will not disclose any such data except as provided in any agreement between the Educational Entity and Us or in connection with a qualified research project or scholarly pursuit. In addition, We will notify any Educational Entity in writing (to the extent legally permissible) prior to the disclosure of any Educational Entity Data required by a court of competent jurisdiction or an administrative body.

We will not transmit or store Educational Entity Data outside the United States without the consent of the Educational Entity. All Educational Entity Data will be stored, processed, and maintained solely on designated target servers and at no time will such data be processed on or transferred to any portable or laptop computing device or any portable storage medium, unless that storage medium is in use as part of our backup and recovery processes.

We will use Educational Entity Data solely for the purposes expressed in any agreement between the Educational Entity and Us or for research and purely scholastic endeavors. Such Data will not be distributed, repurposed or shared across other applications, environments, or business units of TreeTop. In addition, except in the case of research and purely scholastic endeavors, Educational Entity Data will not be transmitted, exchanged or otherwise passed to other vendors or interested parties except on a case-by-case basis as specifically agreed to in writing by the Educational Entity.

In the event of an unauthorized release of Educational Entity Data requiring notification of the individuals affected, We shall assume responsibility for informing all such individuals in accordance with applicable law.



### 13. **California privacy**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal data by TreeTop or its affiliates to a third party for the third party's direct marketing purposes. To make such a request, email Us at [privacy@treetopllc.com](mailto:privacy@treetopllc.com). TreeTop complies with the California Online Privacy Protection Act of 2014.

### 14. **Compliance with Children's Online Privacy Protection Act**

As a business service, TreeTop does not target its software or services toward, and does not knowingly collect any personal data from, users under 13 years of age.

### 15. **Security**

TreeTop takes reasonable and appropriate measures to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the personal data. However, no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, We cannot guarantee its absolute security. We have put in place procedures to deal with any suspected breach of personal data, and We will notify you and any applicable regulator of a breach where We are legally required to do so. If you have any questions about our security, you may contact Us at [privacy@treetopllc.com](mailto:privacy@treetopllc.com).

### 16. **Privacy Policy changes**

We may update this Privacy Policy to reflect changes to our privacy practices. If We make any material changes, We will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

### 17. **How you may contact Us**

If you have questions or concerns regarding this Privacy Policy, you may email Us at [privacy@treetopllc.com](mailto:privacy@treetopllc.com).