

Effective as of June 29, 2023

PRIVACY POLICY

Introduction

Your privacy is important to Bridgeport Neighborhood Trust, Inc., doing business as Building Neighborhoods Together (bntweb.org) (sometimes hereinafter referred to as “BNT”, “we”, or “us”). We want you to be familiar with how we collect, use and disclose your identifying information, including information relating to your computer or your device (collectively, “Personal Information”). This statement (“Privacy Statement”) describes our practices with information that we collect from a user (sometimes referred to as “you” or “your”) through our websites and applications (collectively, the “Site”). This Privacy Statement only addresses information collected directly through or from our Site – it does not address or govern any information-gathering, use, or dissemination practices related to information collected from you other than directly through or from the Site, such as from telephone, facsimile, postal mail, personal delivery, or other or additional offline means or media. Neither does it address or govern any information-gathering, use, or dissemination practices related to information collected from you through a third-party service provider, such as PayPal.

You can contact us at info@bntweb.org.

1. Collection of Personal Information from Users

When you interact with us through the Site, we may collect information from you as described below.

a. Information You Provide

Some elements of the Site may ask you to submit Personal Information in order for you to benefit from the specified features or participate in a certain activity, such as donation processing. For example, if you make a donation on the Site, we will collect your credit or debit card or other financial account information. When you perform a search within the Site, BNT may record information identifying you or linking you to the search performed and recording information related to the search request. We may combine information you submit through the Site with other information we have collected from you, whether on-line or off-line. Below is a list of all information we may collect (depending on the circumstances):

- Name
- Email address
- Phone number
- Employer’s name
- Home address
- Business address

In addition, you may be asked to provide other information in order to complete certain registration and RSVP forms available through the Site.

We treat any of the above types of information in accordance with this Privacy Statement.

c. Sensitive Information

Unless we specifically request or invite it, we ask that you not send or otherwise disclose to us your political opinions, religion or other beliefs, health, criminal background, or trade union membership. In those cases where we may request or invite you to provide the foregoing information, we will only do so with your express consent, in accordance with applicable data protection law requirements. Where you provide us with such information without request from BNT, we reserve the right (but do not have any obligation) to erase any such information at our discretion.

d. Information about Minors

The Site is not intended for persons under the age of 18. We do not knowingly collect Personal Information online from persons under the age of 18. We reserve the right (but do not have any obligation) to delete any information identified as having been provided by such persons at our discretion.

e. Location Information

Any comment system on the Site may utilize an opt-in Geolocation service in accordance with a prevailing community standard such as HTML 5. Such Geolocation opt-in ability is managed by the user's browser settings. If a user chooses to opt-in to the Geolocation service, the user's comments may be associated with the user's location, both internally within BNT and publicly on the Site. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it.

f. Passive Information Collection, Use, and Choices

When you navigate our Site or use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services.

Usage Information: We may collect information about your activity on our Site and how you use our services (e.g., date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring webpage address, advertising that you click on) and how you interact with other users (e.g., users you connect and interact with, time and date of your exchanges, number of messages you send and receive).

Device Information: We may collect information from and about the device(s) you use to access our services, including:

- hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google’s AAID and Apple’s IDFA, both of which are randomly generated numbers that you can reset by going into your device’ settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
- information on your wireless and mobile network connection, like your service provider and signal strength;
- information on device sensors such as accelerometers, gyroscopes and compasses.

Social Media Widgets: Our Site may include social media tools, including social media widgets or plug-ins, to connect you to your social media accounts. These features may set a cookie or use other automatic collection and tracking technologies to collect information about you and your use of the social media features through and in connection with our Site. These social media tools may be hosted by a third party. Your interactions with these tools and the corresponding social media platforms are governed by the privacy policies of the companies that provide such platforms.

Cookies: Like many companies, our Site may use “cookies” to help make sure the Site is meeting the needs of its users and to help us make improvements. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies set by us on the Site to tell us, for example, whether you have visited us before or if you are a new visitor. We use third-party cookies set by our service provider, Google Analytics, to collect information about how visitors use the Site, including how long you spend on each page, and how you got to the Site. We do not use data collected by cookies to identify who you are. We do not allow Google to use or share our analytics data.

You can refuse our use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies you may not be able to access all or parts of our Site or functionality may be limited. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies.

Changing your internet browser settings can prevent the use of cookies. Each browser has a different procedure for disabling the use of cookies. The Help function within your browser should tell you how. Alternatively, you may visit <http://www.aboutcookies.org> where you can review information on how to control cookies on a variety of browsers. You will also find details of how to delete cookies from your computer and other general information about cookies. You can visit <https://tools.google.com/dlpage/gaoptout> for information on how to opt out of Google Analytics cookies.

Google Analytics: We use Google Analytics, which is provided by Google Inc. It uses cookies to collect, for example, information about the operating system and the browser that you use, your IP address, the website you previously accessed (referrer URL) and the date and time of your visit to the Site. On subsequent repeated visits to the Site, frequently used information is automatically

displayed for you. We are able to track your usage patterns with the help of the cookies. The information generated by cookies about the use of the Site is transmitted to a Google server, which may be located within or outside of, the United States, and stored there. Google will use this information to evaluate your use of the Site. Google may transfer these rights to third parties insofar as it is required to do so by law or in order that data may be processed on Google's behalf. By accepting this policy, you consent to the processing of your data by Google. You can visit <https://www.google.com/analytics/learn/privacy.html> to learn more about Google Analytics' use of cookies

2. How and Why We Use the Information We Collect

We use Personal Information submitted by you or otherwise collected through the Site and through other sources for the purposes described in this Privacy Statement and as otherwise described herein and to you at the point of collection. Generally, we use the information you provide to us for the reason for which it was provided. For example, if you sign up to receive email notifications, we will contact you by email. If you provide us with information to make a donation, we will use the information to process your donation. We may also use the information to solicit further donations. Specifically, we may use Personal Information from or about you:

- i. to respond to your inquiries and to send you information that you request and to process your donations;
- ii. to send you important information regarding our relationship with you or regarding the Site, changes to our terms, conditions, and policies, and other administrative information;
- iii. to notify you about upcoming events and opportunities to make donations;
- iv. to promote our services;
- v. for our business purposes, such as data analysis, audits, recordkeeping, developing new products or services, enhancing the Site, improving our services, identifying Site usage trends, optimizing your experience on the Site, and determining the effectiveness of our fundraising campaigns;
- vi. to prevent, detect and fight fraud or other illegal or unauthorized activities, including addressing ongoing or alleged misbehavior on and off-platform, performing data analysis to better understand and design countermeasures against these activities, and retaining data related to fraudulent activities to prevent against recurrences; and
- vii. to ensure legal compliance and enforce or exercise our rights, for example our Terms (as defined below).

If we intend to collect and use Personal Information for another purpose, we may seek your permission at the time the information is collected. We may use any information that does not personally identify you, your computer, or your device, for any purpose.

3. Our Disclosure of Your Information.

We may share your information with third party service providers and partners who assist us in operating the services, and, in some cases, legal authorities.

- We may share certain Personal Information to the companies or individuals that we hire to provide services to us, such as website hosting services and payment processing. We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.
- We may share your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, or assets (including in connection with any bankruptcy or similar proceedings).
- We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.
- We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

In some cases, we may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information. That we may ask for consent under certain circumstances, however, does not mean that we are not entitled to share your information without your consent in accordance with the terms of this Privacy Statement.

4. Uses and Disclosures to Comply with Laws.

In addition, we use and disclose Personal Information collected through the Site as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations; (vi) to protect our rights, privacy, safety, or property or that of you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

5. Links to Third Party Sites.

The Site may contain links to other websites for the convenience of users in locating information, products, or services that may be of interest. If you access a third-party website from a link on this Site, any information you disclose on that website is not subject to this Privacy Statement. It is

possible that these links may be used by third parties or others to collect personal or other information about you. BNT is not responsible for the privacy practices of such websites, advertisers, or third parties or the content of such websites and it is your sole obligation to review and understand the privacy practices and policies of these other websites. BNT does not control these third parties' use of cookies, collection of information, or how they manage such information. It is solely your obligation to review and understand the privacy practices and policies of these other websites, advertisers and any third parties.

6. Where Your Information is Processed.

BNT is based in the United States. No matter where you are located, your Personal Information will be collected and processed in the United States. The laws of the United States and other countries governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

7. Security

We take reasonable steps to protect you from unauthorized access to or alteration, disclosure or destruction of your Personal Information. As with all technology companies, although we take steps to secure your information, you should understand that no transmission over the Internet is ever fully secure. Accordingly, we do not promise, and you should not expect, that your Personal Information will always remain secure.

We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately at info@bntweb.org.

Also, BNT uses reasonable efforts to ensure that the Site is generally available. However, there will be occasions when access to the Site will be interrupted or unavailable. BNT will use reasonable efforts to minimize such disruption where it is within its reasonable control. You agree that BNT shall not be liable to you for any modification, suspension or discontinuance of the Site.

8. Data Retention

We generally retain Personal Information for so long as it may be relevant for the purposes identified in this Privacy Statement, unless a longer period of time is required by law.

In practice, we delete or anonymize your information upon deletion of your account, unless:

- we must keep it to comply with applicable law;
- we must keep it to evidence our compliance with applicable law;
- there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or

- the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account.

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

9. Lawful Basis for Processing Your Personal Information.

The laws in some countries may require us to tell you about the lawful grounds we rely on to collect, use, disclose, and otherwise process your Personal Information. To the extent those laws apply, our lawful bases for collecting, using, disclosing and otherwise processing your Personal Information is in support of our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms. In many cases, we handle Personal Information because it furthers our legitimate business and charitable interests.

This Privacy Statement is issued on behalf of Building Neighborhoods Together as controller of your Personal Information under applicable data protection laws. A "controller" is the person or organization who determines the purposes for which, and the manner in which, any Personal Information is, or is likely to be, processed.

10. Your Data Rights and Choices.

You can opt-out of the use of certain cookie-related processing by following the instructions in Section 1(e) above (Passive Information Collection, Use, and Choices).

If you are within the European Union, you have the following rights:

- You have the right to request from BNT access to your personal data, and the rectification of inaccurate personal data concerning you.
- You have the right to obtain from BNT the erasure or the restriction of processing of your personal data in certain circumstances, including when the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, except when BNT is required by law to maintain or otherwise process your personal data, for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another person.

You may exercise these rights by contacting BNT using the contact information provided above. If you are within the European Union, you also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work, or place of an alleged infringement of the applicable data protection law. However, we encourage you to contact us first at info@bntweb.org, and we will try to resolve your concerns.

If you would like to submit a data access, correction, restriction, or deletion request, you can do so by contacting us at info@bntweb.org and we will process such request with respect to any Personal Information that we are able to link to you individually based on the information that you can provide to us. These rights and options that you have with respect to Personal Information are subject to limitations and exceptions under applicable law and our rights herein.

11. Right to Change Privacy Statement.

BNT reserves the right at any time to modify, alter, or update this Privacy Statement. Your use of the Site following any changes means that you agree to follow and be bound by the Privacy Statement as changed, subject to limitations under applicable law. Any change to this Privacy Statement shall be effective as to any user who has visited the Site before the change was made. Please review this policy periodically, and especially before you provide any Personal Information to us. The Privacy Statement was last updated on the date indicated above.

12. Contacting Us.

For questions about this website, please contact us at info@bntweb.org.

For questions about privacy or handling of your personal information, please contact us at info@bntweb.org.

To contact us by mail:

Bridgeport Neighborhood Trust, Inc.
d/b/a Building Neighborhoods Together
570 State Street
Bridgeport, CT 06604