The Basics Privacy Policy

Last Revised on April 3, 2025

This Privacy Policy for The Basics, Inc. ("**The Basics**", "**we**" or "**us**") describes how we collect, use and disclose information about users of our websites, https://thebasics.org/, https://thebasicsboston.org/ and those of our partner communities as indicated on such partner's websites (the "**Websites**"), our text messaging / instant messaging and other applications, including The Basics App, and related services, tools and features, and when we interact with you online or in person (collectively, the "**Services**").

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING ANY OF THE SERVICES OR OTHERWISE INTERACTING WITH US, YOU CONFIRM THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT WISH FOR YOUR INFORMATION TO BE HANDLED IN THE MANNER DESCRIBED IN THIS PRIVACY POLICY, PLEASE DO NOT USE OR ACCESS THE WEBSITES, THE BASICS APP, OR OTHERWISE USE THE SERVICES OR PROVIDE YOUR INFORMATION TO US.

INFORMATION WE COLLECT

When you access or use the Services, we collect certain categories of information about you from a variety of sources.

Information We Collect Directly From You

We collect certain information directly from you, including:

- *Basic contact details*, including name, address, phone number, and e-mail. We collect basic contact details to communicate with you, including communications about our news and updates via our mailing list, and to provide you with the services.

- *Registration information,* including your name, your child's first name and date of birth, gender, the number of adult caregivers for your child, a photograph of your child (optional), zip code, and your device and/or hardware ID for your mobile device.

- *Transaction information,* that you provide when you make a donation on our Websites, or if you are a Partner Organization who pays for participation in our Services, including your payment card information, billing address and date of the transaction.

Any other information, you choose to include in communications with us, for example, when sending a message through our Websites 'Contact Us' Form, uploading information to The Basics App, including pictures or other information, text messaging / instant messaging, or via our social media channels.Some features of the Services may require you to enter certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features.

- ***Information We Collect Automatically***

We also collect certain information automatically from you. We use cookies and similar tracking technologies to track the activity on the Services and hold certain information. Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your

browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze the Services.

We and the third parties we work with use cookies and similar tracking technologies to collect information about your use of the Services, such as your IP address, browser type, browser version, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Services and other websites, provide customer support, troubleshoot issues with and improve the operation of our Websites and Services, and better understand your online activity.

For example, we use Google Analytics, which is a web analytics tool that helps us understand how users engage with our Services. Like many services, Google Analytics uses cookies to track user interactions, as in our case, where they are used to collect information about how users use our Services. This information is used to compile reports and to help us improve our Websites. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our Services. For more information on how Google collects and processes data click here. To opt out of tracking by Google Analytics, click here.

If you do not want a cookie placed on your hard drive or mobile device, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser's documentation for information on how to do this. However, if you decide not to accept cookies from us, our Websites and/or Services may not function properly.

- ***DO NOT TRACK***

Your browser settings may also allow you to transmit a "Do Not Track" signal when you visit various websites. Like many websites, our Websites are not designed to respond to "Do Not Track" signals received from browsers. To learn more about "Do Not Track" signals, you can visit http://www.allaboutdnt.com/.

USE OF INFORMATION

The information we collect about you is used in the following ways:

(a) to respond to your communications and provide you with information about our Services;

(b) to include you in our database of donors, volunteers and other contacts;

(c) to provide, support and improve the Services;

(d) to process payments for donations and send you related information e.g., receipts, and to communicate with you about other fundraising efforts;

(e) we may (i) provide you with news and updates about The Basics; (ii) send you surveys to collect feedback about your experience with The Basics and information related to you and your child in order to evaluate and improve the Services; (iii) share educational content or inform you about relevant resources provided by us or others, including 'Basics Insights', via text message,

WhatsApp, The Basics App, or email. You are permitted to opt out of any such communications at any time; or (iv) call you to ask questions related to your participation in the services.

(f) to detect, prevent and address technical issues and other queries or complaints;

(g) for internal business analysis or other business purposes consistent with our mission;

(h) to comply with legal and/or regulatory requirements and cooperate with regulators and law enforcement bodies;

(i) to protect our rights, your rights, and the rights of others, and to meet our own high standards of practice; and

(j) to carry out other purposes that are disclosed to you via the Services.

DISCLOSURES AND TRANSFERS OF INFORMATION

We may disclose your personal information to third parties, as follows:

(a) To third parties we support or share resources with consistent with our mission, such as our fiscal sponsor, Third Sector New England, Inc. ("Fiscal Sponsor");

(b) When we have your permission to make the disclosure or you allow us to share your personal information with another company, such as directing us to share your personal information with third-party sites or platforms, including those of our Fiscal Sponsor. If you use third-party sites or platforms made available through the Services, those third parties will have access to your data to the extent that you have authorized their access. Please consult the "Third Party Website and Links" section below and the third party's privacy policy for additional information.

(c) To third parties that assist us in our operations, including our staff and contacts who may have access to your personal information in order to communicate with you about our programs and events, fundraising efforts or otherwise, as well as other service providers, including those that assist with online surveys as well as those who provide IT support for improvements and maintenance of the text messaging and App platforms.

(d) To enforce our Terms of Use or rules, to ensure the safety and security of our users and third parties, to protect our rights and property and the rights and property of our users and third parties, to comply with legal process, including judicial warrant, rule, order or subpoena or in other cases if we believe in good faith that disclosure is required by law or regulation.

(e) We may also disclose personal information if the disclosure is to a third party in connection with the sale, transfer or re-organization of some or all of or its assets applicable to the Services, and any such acquirer or transferee will have the right to use and disclose such information subject to the terms of this Privacy Policy.

SOCIAL FEATURES

Certain features of the Services permit you to initiate interactions between the Services and third-party services or platforms, such as social networks ("**Social Features**"). Social Features include features that

allow you to click and access our pages on certain third-party platforms, such as LinkedIn and Facebook, and from there to "like" or "share" our content on those platforms. Use of Social Features may entail a third party's collection and/or use of your data. If you use Social Features or similar third-party services, information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both The Basics and the third party may have access to information about you and your use of both the Services and the third-party service. For more information on third-party websites and platforms please consult the "Third Party Website and Links" section below and the third party's privacy policy for additional information.

PARTNER ORGANIZATIONS

The Basics Services are often made available to parents and caregivers through partner organizations, like early childhood centers, schools, health care organizations, employers, and social service agencies ("Partner Organizations"). Partner Organizations have independent relationships with parents and caregivers, and make our Services available to parents and caregivers as a supplement to their own services. Our Partner Organizations may be subject to privacy laws and other rules and policies.

If you provide a partner code or connect through a link when you sign up, or opt in when invited by a partner organization, your account will be associated with a particular Partner Organization (such as your school district or health care provider).

Your Partner Organization will have access to the registered user accounts and associated child and caregiver profiles for the registered users who are signed up through their Partner Organization access code. Partner Organizations may also initiate queries and account deletions from accounts within their partner code. A Partner Organization's access and authority is limited only to those accounts which it supports. Partner Organizations will not have access to any personal information linked to survey responses or monitoring questions to which registered users may respond.

THIRD PARTY WEBSITE AND LINKS

Our Services may contain links to other sites operated by third parties. We do not control such other sites and are not responsible for their content, their privacy policies, or their use of personal information. Our inclusion of such links does not imply any endorsement of the content on such sites or of their owners or operators except as disclosed through the Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties.

PAYMENTS

We use third-party services for payment processing (e.g., payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their privacy policy. These payment processors adhere to the Payment Card Industry Data Security Standards (PCI-DSS) as managed by the Payment Card Industry Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

CHILDREN'S PRIVACY

Our services are targeted at parents and caregivers and we do not seek or knowingly collect any personal information from children under 13 years of age. If we become aware that we have unknowingly collected personal information from a child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database. If you are the parent or guardian of a minor child who has provided us with personal information, you may contact us using the information below to request it be deleted.

HIPAA

We do not create, receive, maintain or transmit "protected health information" as a "business associate" of our partners, and are therefore not subject to the Health Insurance Portability and Accountability Act of 1996, as amended (HIPAA).

DATA SECURITY, INTEGRITY AND RETENTION

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware that, despite our efforts to implement security controls, no security measures are perfect or impenetrable. We will retain your personal information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required, or for the establishment, exercise or defense of legal claims, or for legitimate business purposes, or as provided by law.

YOUR CALIFORNIA PRIVACY RIGHTS

Under the California "Shine the Light Law," California residents have the right to request certain details about how their "personal information" (as defined in Cal. Civil Code § 1798.83) is shared with third parties for direct marketing purposes. To the extent we have shared personal information in this way, California users may, under certain circumstances, request and obtain certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us using the information listed below. Please note that we are only required to respond to one request relating to direct marketing purposes per California resident each year. See "Contacting Us" below.

DATA SUBJECT RIGHTS

Depending on where you live in the US and subject to certain exceptions, you may have some or all of the following rights:

- **Right to Know**. You have the right to request that we disclose to you the personal information we collect, use, or disclose, and information about our data practices.

- **Right to Request Correction**. You have the right to request that we correct inaccurate personal information that we maintain about you, subject to certain exceptions.

- **Right to Request Deletion.** You have the right to request that we delete your personal information that we have collected from or about you.

- **Right to Object to Targeted Advertising, Profiling, Sharing, or Selling**. You may have the right to opt-out of the processing of your personal information for the purposes of targeted advertising, the sharing or sale of your personal information, and the profiling of your personal information in furtherance of decisions that produce legal or similarly significant effects.

- **Right to Limit Use and Disclosure of Sensitive Personal Information**. You have the right to limit our use and/or disclosure of sensitive personal information to only what is necessary to perform the services or provide the goods reasonably expected by an average resident.

- **Right to Non-Discrimination**. We will not discriminate against you for exercising any of these rights.

To submit a request to exercise any of these rights, please use the "Contacting Us" information below.

Under US privacy laws, you may also designate an authorized agent to make these requests on your behalf. If you use an authorized agent to submit a request, please note that we may need to collect additional information, such as a valid government-issued ID, to verify your identity before processing your request to protect your information and the integrity of our products. In addition, where applicable, we will provide you with more information about our appeal process. When you submit a request or launch an appeal, we will limit our collection of your personal information to only what is necessary to securely fulfil your request or process your appeal. We will not require you or your authorized agent to pay a fee for the verification of your request or appeal.

UNSUBSCRIBING FROM EMAIL AND/OR TEXT MESSAGES/INSTANT MESSAGING

If you no longer wish to receive email and/or text/instant messages from us, you can opt out of this Service by either (i) following the "unsubscribe" instructions provided, or (ii) contacting us using the information provided in the "Contacting Us" section below.

UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the "Last Revised" date at the top of this Privacy Policy. It is your sole responsibility to check our Websites from time to time to view any such changes in the Privacy Policy. When we change the Privacy Policy in a material manner, we will notify you by posting an announcement on our Websites. Your continued use of the Services after any change constitutes your acceptance of the new Privacy Policy.

IF YOU DO NOT ACCEPT AND AGREE TO THIS PRIVACY POLICY, INCLUDING ANY CHANGES, THEN YOU MUST NOT ACCESS OR USE THE SERVICES.

CONTACTING US

Any questions or concerns regarding the use or disclosure of information about you should be directed to The Basics at support@thebasics.org.

You may contact us regarding the Services or this Privacy Policy at: support@thebasics.org