

This Privacy Policy (“Policy”) describes the Personal Information that Ministry Brands Holdings, LLC and its affiliates (“Ministry Brands”, “we”, “us”, or “our”) may collect and otherwise process through our websites and mobile applications, including, but not limited to, ministrybrands.com, other Ministry Brands affiliated websites, and affiliates whose websites and mobile applications link to this Policy (each, a “Site” and collectively, the “Sites”), or otherwise in the course of providing our services (together with the Sites, the “Services”). For an overview of the Ministry Brands family of companies and the Services governed by this Policy, please click [here](#). This Policy is designed to help you understand how we collect, use, and safeguard the information we obtain through the Services and to assist you in making informed decisions when using our Services.

Please note that certain of our Services, such as our background screening service Sites, may include additional privacy disclosures relevant to the Personal Information that we collect through those Services.

PERSONAL INFORMATION WE COLLECT

“Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with, a particular consumer or household.

Information Collected From You

We obtain Personal Information in the course of providing our Services. The Personal Information we collect about you depends on your relationship with us. For example, we may collect the following Personal Information in the following contexts:

- From **visitors** to our Sites, we may collect: name, company name, telephone number, email address, blog posts or comments, online chats, other information provided via a webform, IP address, geolocation data, and information collected by tracking technologies as discussed further in our [Cookie Notice](#). Note that information typed into an online form may be collected, even if the form is not submitted and/or payment is not processed.
- From **job applicants** seeking employment with Ministry Brands, we may collect: name, address, telephone number, email address, age of birth, employment and education history, certain protected classification characteristics if applicable, and any other information necessary to vet candidates for employment.
- From **clients, potential clients, business partners**, and their **representatives**, we may collect: business contact data such as name, corporate affiliation, telephone number, email address, payment information, username and password, and the contents of their communications with us.
- From **consumers** (i.e., our clients’ customers, congregants, parishioners, attendees, donors, volunteers, workforce, and other consumers) that interact directly with us or about consumers from clients acting on consumers’ behalf, we may collect: name, address, email address, bank account and banking routing information, credit card or other payment card information, username and password, account profile details, photographs, videos, and audio recordings, and user-generated content or communications. Depending on the Ministry Brands Service in use, additional information may also be collected such as driver’s license or other form of government-issued identification, Social Security number, information about family members including children, photographs, videos, audio recordings, messages and chats, and geolocation data. Individuals who interact with our Services through our clients should refer to that client’s privacy policy for information on how the organization collects, uses, and protects Personal Information and should direct inquiries regarding the same (including access, deletion, and modification requests) to that organization.

For additional information specific to our background screening products, please see the section below called Additional Disclosures Relating to Background Screening Services.

Information Collected Automatically

We and our service providers may use certain online tools, such as cookies, web beacons, and other tracking technologies, to automatically collect information when you interact with the Sites. Our [Cookie Notice](#) addresses the information that may be collected

automatically from visitors to our Sites.

Information Obtained Through Interactive Features and Third Party Integrations

We may engage vendors to provide certain interactive features on our Sites. Your use of these interactive features is voluntary, and we may retain the information that you submit through the features. For example, we may offer an interactive chat feature on our Sites to answer questions and for other customer service purposes. When you participate in the interactive chat, either with a virtual or live agent, the contents of the chat may be captured and kept as a transcript. By using these features, you understand that our vendors may process the information obtained through the feature to provide the service on our behalf.

You may disclose your own Personal Information on message boards, chats, profile pages, and other social networking features and services to which you are able to post information and materials. Please note that any information you post or disclose through these services may be available to visitors to the Sites and the general public, depending on the particular service and any privacy settings in place (such as through your profile).

We may offer third party integrations on our Sites. If you choose to connect a third-party account to our system, you should refer to that party's privacy policy for information on how your Personal Information is collected, used and protected. One such integration is YouTube API Services, which may collect, store, use, process and share Personal Information as described in this Policy. The YouTube API Services also may serve content and store, access and collect Personal Information from your devices as described in this Policy and our [Cookie Notice](#). For more information about the YouTube API Services, please refer to the [Google Privacy Policy](#). In addition to exercising your choices as described in this Policy and our Cookie Notice, you can revoke access to your Personal Information collected and processed through the YouTube API Services using Google's security settings at <https://security.google.com/settings/security/permissions>.

Our apps use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

Please note that Ministry Brands is not responsible for the content or privacy practices of any non-Ministry Brands websites to which the Sites may link. We recommend you review the privacy policy of any third-party website you visit to determine how the operator of that site handles Personal Information.

HOW WE USE PERSONAL INFORMATION

We use the Personal Information we collect through the Services for a variety of business purposes including the following:

- Provide access to, secure, and improve the Services, which may include facilitating and personalizing your user experience; monitoring and analyzing trends, usage, and activities of Site visitors and users; improving the Services; providing technical support; and preventing, identifying, and stopping suspected or actual fraudulent or illegal activity, or any activity that violates our policies.
- Provide services to our clients, such as managing client access to our Services, fulfilling requests, responding to inquiries, and otherwise providing requested services or products.
- Payment services, which may include processing online payment transactions, providing information about past payments, and generating receipts.
- Communications, such as using contact details to provide information about our products and services and our clients, business partners, and affiliates' services, inviting you to participate in our events or surveys, or otherwise communicating with you. As permitted by applicable law, we may use your Personal Information to advertise and market our products and services to you.
- Fraud detection services, which may include using your Personal Information to detect and prevent fraud against us and our clients, including to detect unauthorized log-ins.

- Compliance. We may use Personal Information to comply with applicable laws, regulations, or legal processes, industry standards, and Ministry Brands policies.

HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose Personal Information we obtain through the Services in the following ways, subject to applicable law and in accordance with contractual restrictions, as appropriate.

- Affiliates, which means we may share Personal Information amongst the family of companies that makes up Ministry Brands.
- Clients, which may include client representatives, and third parties authorized by our clients, in accordance with the client's privacy policies and practices.
- Business partners, which may include companies with whom we have formed a strategic partnership or established an integration.
- Service providers or contractors, such as service providers that help us provide, analyze, and improve the Sites and communicate, market, advertise, and provide the Services. We authorize such service providers to use or disclose the Personal Information that we make available to them to perform services on our behalf and to comply with applicable legal requirements.
- Compliance with law, which may include disclosing your information to a third party (including law enforcement) if we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or government request (including to meet national security or law enforcement requirements) or to enforce our agreements and policies.
- Safety and security, such as disclosing your information to a third party to protect the security or integrity of the Sites or our Services; to protect ourselves, our clients, or the public from harm or illegal activities; or to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a death or serious bodily injury.
- Corporate transactions, we may share Personal Information with third parties in connection with a business transaction, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business assets, including negotiations of the transaction.
- Consent, we may otherwise disclose Personal Information with your consent.

SECURITY AND RETENTION

We maintain organizational, technical, and administrative measures designed to protect Personal Information against unauthorized or illegal access, destruction, use, loss, modification, or disclosure. We make reasonable efforts to provide a level of security appropriate to the risk associated with the processing of Personal Information, however, no data transmission or storage system is guaranteed to be 100% secure in all circumstances.

We keep the Personal Information described above for as long as is necessary for the purposes described in this Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- Your Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or

- We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our information retention policies, please contact us using the contact details below.

CHILDREN'S PRIVACY

The Sites are not directed at children under the age of 16 and we do not knowingly collect information from children under the age of 16 through the Sites. If we become aware that we have received Personal Information from a person under the age of 16, we will delete it in accordance with applicable law.

INFORMATION FOR USERS OUTSIDE THE UNITED STATES

If you are visiting the Sites or otherwise using the Services from outside the United States, please be aware that information we obtain about you will be processed in the United States or in other jurisdictions. By using the Services, you acknowledge your Personal Information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your Personal Information transferred to the United States or other countries may be different from the laws in your country of residence.

YOUR CHOICES

If you have a registered account with one of our Services, you can login to that account to edit your profile information. Please note that account updates to one Service may not update your accounts on other Services.

You may opt out of receiving email marketing communications from us by clicking the unsubscribe link included in our emails or contacting us [here](#). Please note that we may still send you transactional and administrative emails even if you opt out of marketing communications.

You may opt out of receiving automated text message marketing communications from us by replying "STOP" to the message or contacting us [here](#). Please note that we may still send you transactional and administrative text messages even if you opt out of marketing communications.

Based on where you live, you may have additional rights regarding the Personal Information we maintain about you. See the Your Privacy Rights section below.

YOUR PRIVACY RIGHTS

Depending on your state of residence, you may have some or all of the privacy rights listed below with respect to the Personal Information we maintain about you. Please note that these rights are not absolute, may apply only in certain circumstances and, in certain cases, we may decline your request as permitted by law.

- Right to Confirm / Access / Know. You may have the right to request access to Personal Information that we hold about you, including details relating to the ways in which we collect, use, and share your information. Residents of California have the right to know the categories of Personal Information we have collected about them, the categories of sources from which the Personal Information is collected, the categories of Personal Information sold, shared, or disclosed, the business or commercial purpose for selling, sharing, or disclosing the Personal Information, and the categories of third parties to whom we have sold, shared, or disclosed their Personal Information. California's "Shine the Light" law also permits users of our Sites that are

California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes.

- *[Right to Delete](#)*. You may have the right to request that we delete Personal Information we maintain about you.
- *[Right to Correct](#)*. You may have the right to request that we correct inaccurate Personal Information we maintain about you.
- *[Right of Portability](#)*. You may have the right to receive a copy of the Personal Information we hold about you and to request that we transfer it to a third party.
- *[Right to Opt-Out](#)*. You may have the right to opt-out of certain uses of your Personal Information such as for (i) targeted advertising, (ii) "sale" or "sharing" for cross-context behavioral advertising, or (iii) profiling or automated decision-making activities that result in a legal or similarly significant effect on you. You can opt-out of these uses of your Personal Information through our [Do Not Sell or Share My Personal Information](#) link. Additionally, if you visit our Sites with the Global Privacy Control opt-out preference signal enabled, if required by law, we will treat that signal as a request to opt-out of "sale," "sharing," or targeted advertising. Please note your request may apply only to the browser or device from which you submit the request unless you are logged into your account. Learn more about the Global Privacy Control [here](#).
- *[Right to Appeal](#)*. You may have a right to appeal our decision if we decline to process your request in part or in full. You can do so by replying directly to our denial. If you are not satisfied with our response to your appeal, you may contact your state Attorney General.

Requests to exercise these rights may be made using the contact information listed below in the Contact Us section, by calling us toll-free at 1-844-916-1301, or as otherwise described in this section. Only you, or as permitted by law, a person that you authorize to act on your behalf, may make a request related to your Personal Information. For certain requests, we must verify your request before we can fulfill it. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or that the requestor is authorized to act on your behalf. We will not discriminate against you for exercising your privacy rights.

For additional information specific to our background screening products, please see the section below called Additional Disclosures Relating to Background Screening Services.

ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS PURSUANT TO THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

This section provides additional disclosures for residents of California, as required by the California Consumer Privacy Act. Please remember that the information we collect varies based on our relationship with you, and note that certain of our activities (e.g., background screening) are not reflected in this section because they are exempt from the CCPA due to their coverage under federal law).

CCPA Categories of Personal Information We Collect and How We Collect It

We collect the following categories of Personal Information about California consumers. This information may be, or have been, collected directly from you, automatically when you use our Services, or from advertising networks, internet service providers, data analytics providers, government entities, social networks, or data brokers.

- **Identifiers**, including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, or other similar identifiers.
- **Personal Information described in Cal. Civ. Code § 1798.80(e)**, including name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or other financial information.

- **Characteristics of protected classifications** under California or federal law, including age and date of birth, marital status, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, or disability.
- **Commercial information**, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- **Internet or other electronic network activity information**, including Internet or other similar activity, browsing history, search history, information on a consumer's interaction with our Sites, application logs, device data and registration, social media account information, or advertisement.
- **Geolocation data**, including location data inferred from your device IP address.
- **Audio, electronic, visual, thermal, olfactory, or similar information**, including photographs and videos, and audio recordings.
- **Professional or employment-related information**, including employer; skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, application form, or cover letter; answers to behavioral or other screening questions in an application or interview; information contained in any personal webpages or documents you choose to share with us; information relating to professional licenses, training, disciplinary actions, and membership in professional organizations; and information relating to membership in civic organizations.
- **Non-public education information**, including school(s) attended, grades, transcripts, record of attendance, disciplinary records, or other information relating to your secondary and post-secondary education.
- **Inferences** used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Sensitive Personal Information**, including Personal Information that reveals a consumer's religious or philosophical beliefs; citizenship or immigration status; precise geolocation data; account log-in in combination with password; contents of messages; or racial or ethnic origin. To the extent we collect sensitive personal information, we do not use it to infer characteristics about individuals.

Purposes for Which We Collect Your Personal Information

We use, and have used, the Personal Information we collect for the following purposes:

- Provide access to, secure, and improve the Services, which may include facilitating and personalizing your user experience; monitoring and analyzing trends, usage, and activities of Site visitors and users; improving the Services; providing technical support; and preventing, identifying, and stopping suspected or actual fraudulent or illegal activity, or any activity that violates our policies.
- Provide services to our clients, such as managing client access to our Services, fulfilling requests, responding to inquiries, and otherwise providing requested services or products.
- Communications, such as using contact details to provide information about our products and services and our clients, business partners, and affiliates' services, inviting you to participate in our events or surveys, or otherwise communicating with you. As permitted by applicable law, we may use your Personal Information to advertise and market our products and services to you.
- Fraud detection services, which may include using your Personal Information to detect and prevent fraud against us and our clients, including to detect unauthorized log-ins.
- Compliance. We may use Personal Information to comply with applicable laws, regulations, or legal processes, industry standards, and Ministry Brands policies.

Sales and Sharing of Personal Information

Under California law, a “sale” of Personal Information does not necessarily involve an exchange of money. Instead, a sale also includes disclosures of Personal Information to third parties who may use the information for their own purposes, such as analytics and advertising cookie providers. Similarly, under California law, “sharing” Personal Information refers to disclosing of Personal Information to third parties for cross-context behavioral advertising. In this context, we sell and share the following categories of Personal Information:

- Identifiers
- Personal Information described in Cal. Civ. Code § 1798.80(e)
- Internet or other electronic network activity information
- Geolocation data
- Inferences

We have sold and shared this Personal Information to our vendors, including third party analytics and advertising partners, including for cross-context behavioral advertising and other marketing, analytics, and advertising services that we utilize on our Sites. We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

Disclosures for a Business or Commercial Purpose

We disclose the above categories of Personal Information to our service providers and contractors for the following business purposes:

- Auditing related to ad impressions.
- Ensuring security and integrity of Personal Information.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, non-personalized advertising.
- Performing services on our behalf.
- Providing advertising and marketing services (except for cross-context behavioral advertising).
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us.
- Processing, maintaining, or collecting Personal Information on our behalf.
- Detecting or protecting against malicious, deceptive, fraudulent, or illegal activity.
- For internal use by the service provider.

Privacy Rights Relating to Your Personal Information

Please refer to the Your Privacy Rights section above for information regarding the rights you have with respect to your Personal Information.

ADDITIONAL DISCLOSURES RELATING TO BACKGROUND SCREENING SERVICES

Additional Information Collected Pursuant to Background Screening Services: In addition to the information described in the Personal Information We Collect section above, Ministry Brands may collect other types of personal information through the consumer reports prepared by our consumer reporting agency affiliates. These consumer reports are based on information available from publicly available sources, other consumer reporting agencies, and other third parties. The additional information they contain may include

criminal history information, credit information, motor vehicle records, education history, employment history, and workforce eligibility and immigration status. Procurement of consumer reports containing such information is subject to the consumer's express authorization. In connection with certain background screening services, third parties may also collect fingerprints and drug testing specimens directly from consumers (but Ministry Brands will not have access to such data).

Additional Consumer Rights Related to Background Screening Services: Consumers about whom we have prepared consumer reports have rights under laws such as the Fair Credit Reporting Act (FCRA) with respect to the information in their consumer report. You may request a copy of, or dispute the contents of, a background check report created about you. To do so, you may use the mechanism available in the footer of the applicable brand's Site.

PRIVACY NOTICE: California Investigative Consumer Reports

This notice is provided for California residents pursuant to the California Investigative Consumer Reporting Agency Act (ICRAA). We are an investigative consumer reporting agencies under California law that prepares and processes "investigative consumer reports" about California residents (i.e., consumer reports containing information about an individual's character, general reputation, personal characteristics or mode of living) to employers for their use for employment purposes, including whether to hire, promote or retain an individual.

Personal Information Disclosure: United States or Overseas: In connection with our preparation and processing of investigative consumer reports, we may transfer personal information about you to our clients, data sources, employees, contractors, or affiliates outside the United States and its territories.

Privacy Practices: Ministry Brands' policies and procedures for preparing and processing investigative consumer reports are designed to comply with the requirements of the California Investigative Consumer Reporting Agencies Act (Cal. Civ. Code § 1786.10 et. seq.) and the federal Fair Credit Reporting Act (15 U.S.C. § 1681 et. seq.). Ministry Brands, for example, maintains policies and procedures designed to limit the purposes for, and circumstances under which, we furnish investigative consumer reports. Ministry Brands maintains reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates. Ministry Brands provides individuals with the ability to request, upon proper identification, access to information we hold about them in our investigative consumer reporting files. Ministry Brands conducts reinvestigations of the accuracy and completeness of information at the individual's request. Ministry Brands also has implemented administrative, technical and physical safeguards designed to protect the information that Ministry Brands maintains in our investigative consumer reporting files. In addition to the contact information provided below, you can contact us at 1-844-916-1301 with inquiries regarding our investigative consumer reporting agency privacy practices.

CHANGES TO THIS POLICY

This Policy is subject to change at our discretion, which will be indicated by updates to the "Last Updated" date at the beginning of the Policy. Your continued use of the Sites after any update to this Policy will constitute your acceptance of the changes.

CONTACT US

If you have any questions or complaints about this Privacy Policy or our privacy practices or wish to exercise your privacy rights, please contact us [here](#).

You may also contact us by email at privacy@ministrybrands.com or by writing to Ministry Brands' Privacy Officer at:

Ministry Brands

13560 Morris Road, Suite 3150

Alpharetta, GA 30004

Attn: Legal Department