

## Privacy Policy

**Effective Date: January 5, 2024**

Campfire Circle and its affiliates (collectively, “us”, “we”, or “our”) are committed to protecting the privacy of your personal information. This Privacy Policy explains how we collect, use, disclose your personal information. It applies to all personal information collected by us:

- (i) when you visit <https://campfirecircle.org/> and any other website or mobile application that links to this Privacy Policy (collectively, the “CC Sites”);
- (ii) when you engage with us via social media;
- (iii) when you make a donation or volunteer;
- (iv) when you participate in camp programs or events;
- (v) when we otherwise interact with you (by email, telephone or otherwise)

(collectively, the “Services”).

By engaging with our Services, you agree to the collection, use, and disclosure of personal information in accordance with this Privacy Policy.

If you have any questions about this Privacy Policy, or regarding our privacy practices, please contact our Privacy Officer at the contact information set out below.

### ***What personal information do we collect?***

When you use our Services, we may collect or receive personal information about you to provide our Services and operate our business. We collect the following personal information:

#### **(a) Information you provide to us directly**

You may provide your personal information to us when you use our Services, including when you: use the CC Sites; contact us with inquiries; make a donation; apply or sign up to be a volunteer; sign up or register for one of our programs or events; complete a registration form, intake form, medical form, or waiver for one of our programs or events; or otherwise access our Services. This information may include:

- Your name and contact information including address, email address and telephone number
- Name of an individual whose donation you make in their name
- Date of birth and other demographic information including gender, race, nationality, religion, education, criminal history, marital status, etc.
- Volunteer history with Campfire Circle
- Caregiver information and emergency contact information
- Health information including medical diagnosis, treatment information, and additional medical information from primary care providers within the circle of care
- Photographs or video recordings at one of our events

This list is not exhaustive. If there is a reasonable expectation that an individual can be identified from the information disclosed (either alone or when combined with other information) such information will likely qualify as personal information. We may collect other information that you choose to provide to us, or that we collect with your consent.

**(b) Information received from you as part of your communications**

When you use our Services, complete electronic forms, communicate with us or contact us by email or phone, we may automatically collect and store certain information about you and the activity you engaged in, for example: your name and contact information; information that you voluntarily provided to us; the nature of your communication; the purpose of the interaction, and the action we took in response to your inquiry or request.

**(c) Information collected automatically**

We may receive and store certain information about you and your device(s) (such as mobile and information technology devices) automatically when you access or use our Services. This information may include:

- **Usage Data** – We may also collect Usage Data that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

- **Site Preferences** – We collect information about your preferences to make your use of the CC Sites more productive through the use of cookies.

**(d) Personal information from publicly available sources and third parties**

We may collect or receive personal information about you from publicly available sources, social network providers, marketing partners, and/or third parties. This may include:

- **Social Network Information** – We may receive information about you from other services. For example, we receive certain information when you interact with our social media accounts.

***For what purposes do we use personal information?***

We may use personal information we collect or receive about you for various purposes.

**(a) To provide you with our services**



We use your personal information to provide you with our Services. For example, we may use: (i) your medical information to provide care; (ii) your gender to assign you to a cabin (if you attend one of our camp programs); and/or (iii) your address to plan our programs.

If the applicable personal information is to be provided or Service is to be performed by a third party, then we will disclose the applicable personal information to the third party providing the personal information or performing applicable Services. Your personal information may be available or provided to third-party service providers (such as credit card companies, and payment processing companies) and that are contractually obligated to protect your personal information as disclosed in this Privacy Policy.

#### **(b) To maintain, improve, and personalize the services**

We use your personal information for our everyday business operations such as auditing and administration of our Services. Your information may also be used to help us improve our Services. We also use your information to personalize your experience. For example, we may personalize advertisements, promote fundraising events, marketing communications, and recommendations to make them more tailored to your interests.

#### **(c) To communicate with you**

We use your personal information to:

- communicate with you; and
- respond to inquiries and requests from you.

We may also contact you about upcoming events, volunteering opportunities, donations, fundraiser campaigns, or other communications that may be of interest to you. If we send you marketing emails about Services that may interest you, each email will contain instructions permitting you to “unsubscribe” from receiving future marketing or other communications within 10 days.

In the event you contact us, we use certain information to respond to your questions and assist you with any issues that may arise in your use of our Services.

#### **(d) For account and network security purposes**

We care about keeping you secure and safe while using our Services. Keeping you safe requires us to process your personal information, such as your activity information and other relevant information. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information.

#### **(e) To fundraise**

Campfire Circle is dedicated to supporting children and their families impacted by childhood cancer and other life threatening diseases by raising funds to provide camp-inspired programs and research toward the improvement of health and social wellness outcomes. Unless you tell us not to, your name and address will be added to our fundraising database.

**(f) To conduct quality and experience surveys**

We want to hear from you about the quality of programs and your experience with Campfire Circle. We will use your name and address, and the dates of your visits and/or interactions to send you surveys. This information helps us evaluate and improve the quality of camp programs and experience we provide.

**(g) To maintain legal and regulatory compliance**

Our Services are subject to certain laws, regulatory and/or professional obligations, which may require us to process your personal information. For example, we process your personal information to fulfill our professional obligations, or as necessary to manage risk as required under applicable law.

**(h) To enforce compliance with our Terms and Conditions and policies**

When you access or use our Services, you are bound to our Terms and Conditions and this Privacy Policy. To ensure you comply with them, we process your personal information by actively monitoring, investigating, preventing and mitigating any alleged or actual prohibited, illicit or illegal activities on our Services. We also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies; enforce our agreements with third parties and business partners.

**(i) For our business purposes**

We may use personal information for other purposes disclosed to you at the time we collect or receive the information with your consent or as permitted or required by law.

**When and to whom do we disclose personal information?**

Your personal information is not shared with third parties without your permission, except as described below.

Health-care providers: Relevant health information may be shared with health-care providers involved in your care while participating in camp programs. This includes providers who may volunteer at Campfire Circle. Our systems securely share electronic information to provide timely and coordinated patient care.

Our affiliates, subsidiaries, and/or partners: We may share information with and among our affiliates, subsidiaries, and/or partners to provide our Services and for other purposes outlined in this Privacy Policy.

Service providers: We may transfer (or otherwise make available) personal information to service providers (including affiliates acting in this capacity) who perform services on our behalf. For example, we may use service providers to store and process records, provide back-up, process payments, or provide data analytics and marketing services. Personal information may be maintained and processed by our service providers in the US, Canada or other jurisdictions. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own purposes.



Disclosures authorized or required by law: There are limited situations where we are legally required or authorized to disclose your personal information without needing your consent. These situations include but not limited to reporting infectious diseases, or by court order.

Disclosures with consent: We may disclose your personal information in other circumstances with your consent.

You can withdraw your consent, except where the disclosure is required by law. To withdraw your consent, please contact our Privacy Officer at [privacy@campfirecircle.org](mailto:privacy@campfirecircle.org). If you withdraw your consent, we may not be able to provide you with our Services.

### ***Cookies, other tracking technology, and third-party sites on the CC sites***

We use cookies, web beacons, pixels, and similar technologies to collect information and personalize your experience with our Services.

#### **(a) Cookies**

The CC Sites use a technology called "cookies". A cookie is a tiny element of data that the CC Sites send to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user when they return. We use cookies to remember your preferences and to authenticate you. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from the CC Sites, you may not be able to take advantage of all the website features.

#### **(b) Online analytics and advertising technologies**

We and our third-party service providers may use automated technologies (including cookie identifiers on the CC Sites), along with other collected information, to tailor ads or deliver content when you are on our Services or on other devices, apps or websites.

#### **(c) Interest-based advertising**

We (or our third-party service providers) may use the information we collect, for example, IP addresses and unique mobile device identifiers, to locate or try to locate you across multiple browsers or devices (such as smartphones, tablets, or computers), or work with providers that do this, in order to better tailor content and features and provide you with a seamless experience across devices. If you wish to opt out of cross device tracking for purposes of interest-based advertising, you may do so through your device settings. We may also use cross-device targeting to help identify our users and serve advertising. This type of advertising is often called "interest-based" or "personalized" advertising—and when it occurs on mobile apps, "cross-app" advertising.

You can learn more about interest-based advertising and how to opt-out of receiving tailored advertising by visiting (i) the Network Advertising Initiative's Consumer [Opt-Out link](#) or (ii) the Digital Advertising Alliance's Consumer [Opt-Out link](#).

To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the [Google Ads Settings page](#).



To opt out of X's interest-based ads, you can follow their [instructions](#).

To opt out of Meta (Facebook/Instagram) interest-based ads, you can follow their [instructions](#).

Please note that even if you opt-out, you may still receive advertisements from us. However, the advertising will not be tailored to your interests. Also, we do not control any of the above opt-out links or whether any particular company chooses to participate in these opt-out programs.

#### **(d) Third-party sites**

The CC Sites may contain links to other websites that we do not own or operate. We provide links to third party websites as a convenience to you. We do not have any control over these websites and they are not subject to this Privacy Policy. If you provide any personal information to any third party or through any such third-party website, we recommend that you familiarize yourself with the privacy policies and practices of that third party. We are not responsible for the privacy policies or practices of any third parties.

#### ***How do you access the personal information held by this office?***

You have the right to request access to or obtain a copy of your record in a timely manner. If you request a copy of your record, that will be arranged at a reasonable cost. If you want to view the original record, one of our staff must be present to maintain the integrity of the record, and a reasonable fee may be charged for this access where permitted by law. Please note that there are circumstances where access may be denied.

#### ***What if you feel your record is not accurate?***

We make every effort to ensure that all of your information is recorded accurately. If an inaccuracy is identified, you can request that it be corrected. If we do not agree that the information is inaccurate, we will nevertheless make a note of your position in your file.

#### ***What are your other rights?***

In addition to the right to accessing and correcting your personal information, depending on where you reside and legal limitations, applicable laws in your jurisdiction may grant you the right to make certain privacy requests. Even if you do not live in one of these jurisdictions, we allow you to make the same requests, and we will take reasonable steps to fulfill them.

You may make a request to:

- **Know.** You may request a copy of the personal information we have collected about you.
- **Delete.** You may request that we delete the personal information we have collected about you.

However, it is important to recognize that your right to know and right to delete are not absolute and are subject to certain exceptions.

You may exercise your right to know or your right to delete by contacting us as set out below. We may ask you to verify your identity if you are contacting us through email, or phone. You may also designate an authorized agent to make a request to know or a request to delete. In order to be



able to act, authorized agents have to submit proof that they are authorized to act on your behalf, or have a power of attorney. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on their behalf.

### ***How secure is your information?***

Safeguards are in place to protect the security of your information. These safeguards include a combination of physical, technological and administrative security measures that are aimed at protecting personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Please note, however, that while we believe our security measures are appropriate, no security measures can guarantee absolute security of information.

### ***How long do we keep information?***

We will retain and use your personal information to the extent necessary to comply with our legal and professional obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. When information is no longer required, it is destroyed in a secure manner, according to set procedures that govern the storage and destruction of personal information.

### ***What if we transfer your personal information to another jurisdiction?***

We are based in Canada and, regardless of where you use our Services, the information collected as part of that use will be transferred to and maintained on servers located in Canada. Any information we obtain about you will be stored in accordance with Canadian privacy laws, regulations, and standards, which may not be equivalent to the laws in your country of residence. By using our Services, you consent to this collection, transfer, storage, and processing of information to and in Canada.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### ***Changes To This Privacy Policy***

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### ***How can you contact us?***

If you have any questions or concerns relating to this Privacy Policy or our privacy practices, please contact us at: [privacy@campfirecircle.org](mailto:privacy@campfirecircle.org)