

UKRAINIAN CATHOLIC EDUCATION FOUNDATION ONLINE PRIVACY POLICY

EFFECTIVE APRIL 1, 2020

Ukrainian Catholic Education Foundation (“UCEF” “we,” “us” or “our” in this Privacy Policy) respects your privacy as a visitor to its website and has developed the following privacy policy to inform you about how UCEF handles your personal information after receiving it. This Privacy Policy governs UCEF use of your information both on the UCEF website <https://ucef.org/>.

Please read this Online Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Policy. This Policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

1. Children Under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at the Contact Us information paragraph provided in Section 14 below.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights at Section 11.9 for more information.

2. Types of Information Collected and Stored

2.1. Personal Information Summary.

When you engage in activities such as sign up to receive a UCEF publication, make donations to UCEF, or otherwise use the UCEF website, UCEF may gather your personally identifiable information (“Personal Information”).

Your Personal Information may generally include, but is not limited to, your name, address, phone number, email address, birthdate, electronic signature, personal identification numbers, IP addresses, mobile device identifiers, geo-location, or any other personally identifying data collected from you by UCEF or its authorized agents.

By using the UCEF website, you agree to allow UCEF and its agents to gather, store, and share your Personal Information subject to the limits of this Online Privacy Policy.

- 2.2. Specific types of data we collect about you. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - 2.2.1. Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
 - 2.2.2. Contact Data includes billing address, delivery address, email address and telephone numbers.
 - 2.2.3. Financial Data. When you use the UCEF website to make donations, purchase tickets to UCEF events, or otherwise engage in financial transactions with UCEF, UCEF utilizes third-party payment processors as its agents (“Payment Agents”) to process your payment and provide payment verification to UCEF concerning your payment. UCEF and its Payment Agents utilize systems whereby we substitute a proxy set of identifying information for your real financial information. Our Payment Agents, which do handle your credit cards and other payment information, are PCI Data Security Standard (“PCI DSS”) compliant. UCEF does not collect or store your credit card numbers or other similar financially-related Personal Information and it isn’t exposed more than necessary. For more information about PCI DSS please visit https://www.pcisecuritystandards.org/about_us/.
 - 2.2.4. Transaction Data includes details about payments to and from you and other details of UCEF products and services you have purchased from us.
 - 2.2.5. Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
 - 2.2.6. User Contributed Data. Includes information provided by you to be published or displayed (hereinafter, “Posted”) on public areas of the Website, or transmitted to other users of the Website or third parties. Your User Contributions are posted on and transmitted to others at

your own risk. Although we limit access to certain pages/you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

- 2.2.7. Profile Data includes your UCEF donations, UCEF purchases or orders made by you, your interests, preferences, feedback and survey responses where applicable.
- 2.2.8. Usage Data includes information about how you use the UCEF website, products and services.
- 2.2.9. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.2.10. Aggregated Data / Analytics Information. We also collect, use and share Aggregated Data. In an effort to improve visitors' experiences on the UCEF website, UCEF gathers this Aggregated Data related to individuals' website visits. This information is used solely to measure and improve our website and services and to better serve our members and customers. UCEF uses aggregate statistical data to compile reports. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as Contact Data, Technical Data, and/or Marketing and Communications Data which will be used in accordance with this privacy policy. This analytics information so gathered is likely to include the following:
 - 2.2.10.1. Device and network specific information, such as your unique device identifier, operating system and version, the browser you use, your Internet service provider (ISP), and your IP address.
 - 2.2.10.2. Non-personal information, such as language, zip code, area code, location, and the time zone.
 - 2.2.10.3. UCEF website visit information, such as the domain from which you came to our website or referring links, and details of how you use our website, including but not limited to what webpages you visit on the UCEF website, as well as downloads, purchases, and orders during the duration of your visit. At times we will track user behavior over time during interactions with the site in order to pursue legitimate

business interests, including, but not limited to, troubleshooting technical user issues with site services.

2.3. Sensitive Information.

We may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs). However, any such collection of Special Categories of Data shall be used exclusively in furtherance of UCEF's religious and educational purposes limited to UCEF members and participants in UCEF's religious and educational programs. We do not collect any information about sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data, or criminal convictions and offences.

2.4. Cookies and Browser "Do Not Track" Notice

- 2.4.1. UCEF may use cookies on your computer. A cookie is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website. Every time the user loads the website, the browser sends the cookie back to the server to notify the website of the user's previous activity. Third parties that advertise on the UCEF website do not have access to UCEF cookies, but they may use their own cookies on your computer. Advertisers' use of their cookies and device identifiers is subject to the advertisers' own privacy policies. UCEF does not correlate its use of cookies with your Personal Information.
- 2.4.2. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information
- 2.4.3. UCEF does not respond to browser Do Not Track ("DNT") Signals. UCEF websites may utilize page tags or web beacons to track information related to user visits as a part of UCEF data analytics processes and user experience customization as described below. Page tags are small pieces of Javascript embedded in webpages that collect data to help track web traffic on our website. Web beacons are very small, effectively invisible, graphic images we use to count and recognize users on our website. Such technologies enable us to improve and customize user experiences while users visit our website. UCEF does not correlate its tracking activities through the use of page tags or web beacons with your Personal Information.

- 2.4.4. UCEF may employ third party data analytics firms to track and analyze traffic on the UCEF website, to analyze visitor trends, to determine advertising effectiveness, browser types and usage trends, and to present targeted ads based on anonymous information collected through tracking. UCEF' third party analytics firms, as described in this section, do not receive your Personal Information.
- 2.4.5. Third parties that may advertise on UCEF websites may have content embedded that sets cookies on a visitor's browser and/or tracks visitor information that a web browser visited a specific UCEF website. Such information may contain a visitor's IP address. Third parties may not collect identifying Personal Information from the UCEF website unless you provide it to such third parties.
- 2.4.6. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

2.5. Keeping Information Updated

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

3. Security of Personal Information

UCEF takes the security of your Personal Information very seriously. When your Personal Information is stored by UCEF, we use reasonable and appropriate measures to protect it from loss, misuse and unauthorized access, disclosure, alteration and destruction. Unfortunately, data transmission over public networks cannot be guaranteed to be one hundred percent secure. While UCEF will use all reasonable means to protect your Personal Information, UCEF cannot guarantee the security of your transmissions of such Personal Information, and you use the UCEF website at your own risk. If you suspect your Personal Information has been compromised, please notify UCEF Customer Service using the contact information provided below.

4. How we Collect Your Personal Information. We use different methods to collect data from and about you including through the following methods.

- 4.1. Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - 4.1.1. Sign up for our events, products or services;
 - 4.1.2. create an account on our website;

- 4.1.3. make a donation to UCEF;
 - 4.1.4. subscribe to our service or publications;
 - 4.1.5. request marketing to be sent to you;
 - 4.1.6. give us feedback or contact us.
- 4.2. Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- 4.3. Technical Data from the following parties:
- 4.3.1. analytics providers such as Google based outside the EU;
 - 4.3.2. advertising networks based inside OR outside the EU; and
 - 4.3.3. search information providers based inside OR outside the EU.
- 4.4. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside the EU.
- 4.5. Identity and Contact Data from data brokers or aggregators based inside OR outside the EU.
- 4.6. Identity and Contact Data from publicly available sources.
5. How UCEF Uses and Shares Your Information
- 5.1. General Information and Your Rights. UCEF limits its use of your Personal Information to the stated purposes for which such information is collected. In some cases, UCEF may be required to disclose your Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. You have the right to the following regarding your Personal Information transferred to UCEF:
- 5.1.1. To know the types of Personal Information UCEF collects;
 - 5.1.2. To know the purposes for which it collects and uses your Personal Information;
 - 5.1.3. To know type or identity of third parties to which UCEF discloses your Personal Information, and the purposes for which it does so;
 - 5.1.4. To access and update your Personal Information; and

- 5.1.5. To know the choices and means UCEF offers you for limiting the use and disclosure of your Personal Information.

5.2. UCEF Services to UCEF ID Holders.

When you create an UCEF ID, we may use information collected from technologies such as cookies, web beacons, and page tags, as described herein, to improve your experience of our website. For example, by saving information concerning the pages you visit and products you purchase, we will be able to provide you with information on other UCEF goods and services that may be of interest to you. Furthermore, by creating an account with UCEF, there is a possibility of receiving content from third parties through UCEF, as discussed under Section 5.5, below.

We may use cookies and other technologies in order to recognize your computer at the time we display information you. UCEF does not correlate activities described in this section with your Personal Information.

In creating an UCEF ID, and as a condition of having an UCEF ID, you expressly consent to UCEF' use of your Personal Information and non-personally identifiable information as described in this section. Moreover, in using an UCEF ID you expressly acknowledge and agree to our collection and use of such information as described in this section.

You can opt-out of the use of your Personal Information as described in this section by deleting your UCEF ID. To delete your UCEF ID, please contact UCEF Customer Service using the contact information provided below in Section 14.

5.3. Other UCEF Services.

UCEF may use your Personal Information to provide services to you upon your request. Such services may include sending you newsletters and publications, responding to your questions and comments, communicating with you concerning your purchases on the UCEF website, emailing you updates concerning UCEF products and services, and personalizing your visits to UCEF website.

You may opt-out of the use of your Personal Information as described in this Section by contacting UCEF Customer Service using the contact information provided below.

5.4. UCEF Internal Data Sharing

UCEF may also share your Personal Information with other UCEF offices or UCEF subsidiaries in the country in which you reside and in other countries.

5.5. Information Sharing with Third Parties

- 5.5.1. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may

allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

- 5.5.2. UCEF may utilize third-party service providers that process your Personal Information solely on UCEF' behalf ("Agents"). When UCEF transfers your Personal Information to its Agents, your Personal Information will be used only for limited and specified purposes. UCEF will take reasonable and appropriate steps to ensure that its Agents process your personal information in a manner consistent with the organization's obligations under the Principles. UCEF remains responsible and liable if the Agents that UCEF engages to process your Personal Information on UCEF' behalf do so in a manner inconsistent with this Online Privacy Policy, unless UCEF proves that it is not responsible for the event giving rise to the damage.
- 5.5.3. UCEF may share aggregated demographic information with our partners and advertisers. This is not linked to any Personal Information that can identify any individual person.
- 5.5.4. UCEF uses outside third parties to ship orders and financial service-oriented third parties to bill users for goods and services. All parties with which UCEF shares your Personal Information are bound by confidentiality and data transfer agreements consistent with this Online Privacy Policy.
- 5.5.5. UCEF may partner with third parties to provide other specific services, including, but not limited to registration for UCEF galas, events, conferences and other UCEF program and educational materials. When the user signs up for these services, we may share names, or other contact information that is necessary for the third party to provide these services. UCEF may auto-populate forms utilized by these third parties with data contained in UCEF managed cookies. These third parties are not allowed to use your Personal Information except for the purpose of providing these services. All parties with which UCEF shares your Personal Information are bound by confidentiality and data transfer agreements consistent with this Online Privacy Policy.
- 5.5.6. UCEF may share email information with third parties who provide a pay-per-use list rental service in order to allow third parties to provide mailed content to other UCEF' members.

5.6. Other Possible Disclosures.

In addition to the other disclosures stated herein, UCEF may share your information in the following ways:

- 5.6.1. To comply with applicable laws, regulations, legal processes, or government enforced orders,
- 5.6.2. To enforce applicable terms of service, protect our legal rights or defend against legal claims,
- 5.6.3. To defend, prevent, take action, and otherwise address security or technical issues, as well as suspected or potential fraud,
- 5.6.4. To guard against harm (whether actual or potential) to the legal rights, property or safety of UCEF, our visitors or the general public as required or permitted by law.

6. International Transfers

- 6.1. We share your personal data within UCEF. This will involve transferring your data outside the European Economic Area (EEA).
- 6.2. Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

7. UCEF Purposes In Using Personal Information

We have set out below, in a table format, a summary of the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new donor, customer or member.	(a) Identity (b) Contact	Performance of a contract with you
To register you for UCEF events, conferences and programs.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records

	(e) Financial (f) Transactional	updated and to study how customers use our products/services)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Inviting you to contribute content, or respond to social media communications (c) Managing UCEF member services.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Financial (f) Transactional (g) User Contributed	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) User Contributed	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)

		(b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) User Contributed	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) User Contributed	Necessary for our legitimate interests (to develop our products/services and grow our business)

8. Data retention

8.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

8.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. UCEF Email Uses

9.1. UCEF never rents or sells email addresses to outside parties.

9.2. After you create an online account with UCEF, you will receive information about UCEF products, projects, donation opportunities, services, and educational offerings that relate to your areas of interest unless you choose to opt-out. If you have questions or concerns about UCEF' Online Privacy Policy or wish to no longer receive such offers (opt-out), please contact UCEF Customer Service using the contact information provided in Section 14 below.

10. How to Access or Change Your Personal Information

10.1. To review or make changes to the content of your Personal Information, or to request that we limit the use of your Personal Information, you may request changes and updates by contacting UCEF Customer Service using the contact information provided below in Section 14.

10.2. In your request, clearly state what information you would like to have changed or updated. UCEF will try to comply with your request as soon possible.

10.3. The deletion of Personal Information and other changes to the data retained by UCEF as described above may result in the deletion or limitation of other services UCEF provides. UCEF may retain certain Personal Information to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes, and enforce agreements.

11. Your Legal Rights. You have the right to:

11.1. Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

11.2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- 11.3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 11.4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - 11.5.1. If you want us to establish the data's accuracy.
 - 11.5.2. Where our use of the data is unlawful but you do not want us to erase it.
 - 11.5.3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - 11.5.4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.6. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 11.7. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- 11.8. Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to the Contact listed below. However, please know we do not currently sell data triggering that statute's opt-out requirements.
- 11.9. If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/ccpa>

12. Verification

UCEF will regularly self-assess its compliance with all applicable law. UCEF statement on verification and related self-assessment procedures is available to you upon request.

13. Notices of Changes to Privacy Policy

In the event of any change to the UCEF Online Privacy Policy, notice of such changes will be posted on the UCEF website. Any changes to this Online Privacy Policy will become effective when we post the revised Online Privacy Policy on the UCEF website. Your use of the UCEF website following these changes means that you accept the revised Online Privacy Policy.

14. Contact UCEF

For any questions, comments, or further information concerning the terms of this Online Privacy Policy, or to request changes to your Personal Information, subject to such limitations as provided herein, please contact:

UCEF Customer Service

ucef@ucef.org

(773) 235-8462