Human Unity Gateway Foundation

PRIVACY POLICY

Effective as of 2025

1. Our Commitment

The HUG Foundation exists to empower teens through self-leadership. Trust is central to that work. This policy explains what information we collect through thehugfoundation.org, our programs, and our communications, how we use it, and the choices you have.

> **We do not sell, rent, trade, or share your personal information with third parties for their own marketing purposes. Ever.**

2. Information We Collect

Information you give us directly:

- Name, email address, phone number, and mailing address
- Information submitted through our newsletter signup, volunteer forms, and contact forms
- Your stated areas of interest (donating, endowment contributions, volunteer mentorship, teen stories)
- Donation information processed through our third-party payment partner
- Program application information for participants, parents or guardians, and chaperones
- Photos, video, written testimonials, and other content you provide or consent to have captured at our events
- Any information you include in messages, emails, or calls to us

Information collected automatically:

- IP address and approximate geographic location
- Browser type, device type, and operating system
- Pages viewed, time on site, referring website, and links clicked
- Cookies and similar technologies (see Section 9)

Information from third parties:

- Aggregate or analytics data from our website, email, and social media platforms
- Publicly available information when researching partnership or grant opportunities

3. How We Use Your Information

We use the information we collect to:

- Deliver our youth leadership programs, summits, assemblies, and workshops
- Process donations and issue tax receipts and acknowledgments
- Send newsletters, program updates, event invitations, and impact stories
- Respond to inquiries about volunteering, partnerships, school programs, and mentorship
- Coordinate travel, logistics, safety, and emergency contact needs for program participants
- Improve our website, programs, and communications
- Comply with legal, tax, accounting, and reporting obligations that apply to nonprofit organizations

We do not use automated decision-making or profiling that produces legal or similarly significant effects.

4. Text Message and Email Communications

If you provide your phone number and check the applicable consent box, you may receive text messages from us. Two separate consents apply:

Transactional and informational messages: appointment reminders, program logistics, registration confirmations, and account notifications.

Marketing and promotional messages: event announcements, fundraising appeals, and program news.

Message frequency varies. Message and data rates may apply. Reply **HELP** for help or **STOP** to opt out at any time. Consent to receive marketing messages is not a condition of donating, volunteering, or participating in any program.

Mobile opt-in data and consent are never shared with third parties or affiliates for marketing purposes.

You may unsubscribe from emails at any time using the link in any message, or by contacting us directly.

5. Donor Privacy

We follow the Donor Bill of Rights and apply these commitments to every gift:

- We never sell, rent, trade, or exchange donor names, contact information, or giving history.
- Donation payments are processed by our third-party payment partner. We do not store or have access to your full credit card number, bank account number, or CVV.
- We recognize donors publicly only with permission. You may request anonymity at any time and we will honor it.
- You may request removal from all fundraising communications while remaining a donor of record.
- You may request a copy of our most recent financial statements or IRS Form 990 at any time.

6. Children and Teens

Our programs serve minors, and we treat their information with heightened care.

- Our website is directed to a general audience and is not intended for children under 13. We do not knowingly collect personal information from children under 13 through the website. If we learn we have done so, we will delete it promptly.
- Program participation by anyone under 18 requires written consent from a parent or legal guardian. That consent covers collection of the participant's information for program delivery, health and safety, and emergency purposes.
- **Photo and media consent is separate and optional.** We obtain specific written permission from a parent or guardian before publishing a minor's photograph, video, full name, or story. Consent may be withdrawn at any time by contacting us, and we will remove the material from our owned channels as promptly as reasonably possible. Content already redistributed by third parties may not be fully retrievable.
- Where reasonably possible, we identify minors by first name only in public materials.
- Parents and guardians may review, correct, or request deletion of their child's information by contacting us.

7. How We Share Information

We share personal information only in these circumstances:

Service providers who help us operate, under agreements limiting their use of the information: our website and CRM platform, our donation processing platform, email and SMS delivery providers, and analytics providers.

Program partners when necessary to deliver a specific program you have enrolled in, such as host organizations, travel coordinators, or venue partners. We share only what is necessary for that program.

Legal requirements when we believe in good faith that disclosure is required by law, or is necessary to protect the safety of a participant, our staff, or the public.

Organizational changes such as a merger with another nonprofit, in which case this policy continues to govern the transferred information.

We do not share information with data brokers, and we do not sell personal information as that term is defined under applicable privacy laws.

8. International Visitors and Program Participants

We are based in the United States, and information we collect is processed and stored in the United States. Privacy laws in the U.S. may differ from those in your country.

If you are located in the European Economic Area, the United Kingdom, or Switzerland, you have the right to:

- Access the personal data we hold about you
- Request correction of inaccurate data
- Request erasure of your data

- Restrict or object to certain processing
- Request portability of data you provided to us
- Withdraw consent at any time, without affecting the lawfulness of prior processing
- Lodge a complaint with your local supervisory authority

Our legal bases for processing are consent (for marketing communications), performance of a contract or pre-contractual steps (for program participation), legitimate interests (for operating and improving our work), and legal obligation (for tax and reporting requirements).

To exercise any of these rights, contact us using the details in Section 14. We will respond within the timeframe required by applicable law.

9. Cookies and Tracking

Our website uses cookies and similar technologies to keep the site functioning, remember your preferences, and understand how visitors use our pages.

Most browsers let you refuse or delete cookies through their settings. Disabling cookies may affect some site features. Where required by law, we request consent before setting non-essential cookies.

We honor Global Privacy Control and similar browser-level opt-out signals where legally required.

10. Your Choices and Rights

Regardless of where you live, you may:

- Unsubscribe from emails using the link in any message
- Reply STOP to any text message to end SMS communications
- Request access to, correction of, or deletion of your personal information
- Ask us to stop contacting you entirely

California residents have additional rights under the CCPA and CPRA, including the right to know what personal information we collect and to request deletion. We do not sell or share personal information for cross-context behavioral advertising. We will not discriminate against you for exercising any privacy right.

Submit any request using the contact details in Section 14. We may need to verify your identity before acting, particularly for deletion requests.

11. Data Retention

We keep personal information only as long as needed for the purposes described in this policy. Donation records are retained as long as required by tax and nonprofit reporting rules. Program participant records, including consent forms, are retained for the period required for legal and insurance purposes. Marketing contact information is retained until you opt out.

12. Data Security

We use reasonable administrative, technical, and physical safeguards to protect personal information, including working with vendors who maintain industry-standard security practices. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

13. Third-Party Links

Our website links to external sites, including our donation platform and social media pages. We are not responsible for the privacy practices of those sites. We encourage you to read their policies.

14. Contact Us

Questions, requests, or concerns about this policy or your information:

Human Unity Gateway Foundation
160 Orange Road
Montclair, NJ 07042
USA
Email: connect@thehugfoundation.org
Phone: +1 (917) 414-2424

15. Changes to This Policy

We may update this policy as our programs, technology, or legal obligations change. Material changes will be communicated through our website or by email where appropriate.