

DFA Privacy Policy

Effective Date: This policy is effective and was last updated on January 22, 2021.

We understand that privacy is a very important issue for everyone using or accessing Design for America Services and Studios (as those terms are defined in the Design for America Terms of Use), and we are committed to protecting it through our compliance with this Privacy Policy (this "Policy"). This Policy covers the treatment of all personal information that the Design for America program ("Design for America," "we" or "us") of the Thomas J. Watson Foundation (the "Watson Foundation") collects in connection with or that you may provide when you visit the Websites sponsored by Design for America, including: <https://designforamerica.com/>, <https://www.notion.so/dfanational/DFA-Studio-Portal-f8a895690b7a4e2ba9f0e183fc6055d0>, <https://guides.loft.io/library/dfa>, <https://catalyst.designforamerica.com/>, or any web pages under one of our domains (the "Websites") or participate in a Studio or other Service sponsored by Design for America. By using or accessing the Websites or participating in the Services, you signify your consent to this Policy. The Services and Studios are defined and described in our Terms of Use, which are available here: https://docs.google.com/document/d/1S7ut1V2wmJLRDiJXoC923vE_1ULn1fOniI9GFuaBLL0/edit?usp=sharing.

If you do not agree to this Policy, you are not authorized to access or otherwise use the Websites or the Services. We may make changes to this Policy from time to time. Your continued use or access of the Websites or Services following the posting of any changes to this Policy indicates your acceptance of such changes, so please check this page periodically for updates.

Collection of Information

We collect several types of information from and about users of the Websites and Services, including:

Technical information about your Internet connection, the equipment you use to access the Website and usage details ("Technical Information").

Demographic information such as your gender, race/ethnicity, regional affiliation, educational background and major, your year of graduation and professional experience ("Demographic Information").

Information that identifies you such as your name, physical address, email address, telephone number, photograph, other identifier by which you may be contacted online or offline ("Personally Identifiable Information"). Personally Identifiable Information includes Technical Information, Demographic Information or other information about you that the Websites maintain in combination with any of the preceding identifiers or that can otherwise identify you personally.

Some of the Services are provided using the third-party platforms provided by Crew2030 and Slack Technologies, Inc. These platforms may collect Technical Information, Demographic Information and other Personally Identifiable Information in the course of your use of the Services. The information they collect is not under our direction or control and its use by those platforms will be governed by their privacy policies, which can be found at <https://www.crew2030.org/privacypolicy> and <https://slack.com/trust/privacy/privacy-policy>.

The methods by which we collect this information include:

In the case of Technical Information, automatically as you navigate through the Websites. As is the case for virtually all websites, whenever you visit the Websites, the navigation and clickstream data are stored in a log file. The data stored in a log file can include, among many other things, your IP address, your browser/version, your operating system, date, time, and links that you clicked on within the Websites and the external websites from which you navigated to our site, unique IDs of cookies, unique IDs sent from mobile devices, network carriers or data providers, Internet Service Provider (ISP) information, information about your referring and exit applications, attributes of your computer or device usage, information contained in HTTP headers or other internet transfer protocol signals and other similar data.

Directly from you when you provide it to us. This includes information that you provide by filling in forms on the Websites (for example, upon registration), your search queries on the Websites, records and copies of your correspondence (including email addresses) if you contact us, your responses to surveys that we may ask you to complete for research purposes, and information you provide to be published or displayed (hereinafter, "posted") on public areas of the Websites or in connection with Studios and other resources provided as part of the Services.

From other participants in the Services and from Design for America's third-party partners: Loft (<https://loft.io/>), Notion (<https://www.notion.so/>), Slack (<https://slack.com/>), Crew2030 (<https://www.crew2030.org/>), Qualtrics (<https://www.qualtrics.com/>), Google Drive.

Use of Information

We may use information that we collect about you or that you provide to us, including Personally Identifiable Information:

To evaluate the value of the Websites and Services content for the Websites, Services and system administration, and for anonymous user analysis.

To authenticate your identity.

To notify you about changes to the Websites or Services.

To allow you to participate in interactive features of the Websites and Services.

To respond to an inquiry or provide you with access to a specific Studio, Service or Website.

To deliver the Services including communication with Studio members and otherwise through the Websites and Services.

To allow participants in the Services and Studio members to find and support each other.

To draw insights from aggregated data for the purpose of continuous improvement, furtherance, and promotion of Design for America's mission and programs.

In any other way we may describe when you provide the information or for any other purpose for which you have provided consent.

The information we collect automatically is Technical Information, but we may maintain it or associate it with Personally Identifiable Information we collect in other ways or receive from third parties. This helps us to improve the Websites and Services and to deliver better and more personalized Services, including by enabling us to:

Estimate our participant size and usage patterns.

Store information about your preferences, allowing us to customize the Websites according to your individual interests.

Speed up your searches.

Recognize you when you return to the Websites.

The Websites use cookies to remember certain user information. Cookies are electronic identifiers that are transferred automatically to your through your browser

that allow our systems to save certain information you provide us and store information about you so we can recognize you when you visit the Websites in the future. This allows you to avoid logging in more than once, which saves time, and to create a customized website experience that fits your needs. You may, at any time, disable or refuse to accept cookies by changing the preferences or settings on your web browser. If you choose to disable cookies, you will still be able to use the Websites. However, you will not be able to fully take advantage of certain automation and other functionality features available.

Disclosure of Information

Design for America may disclose aggregated information about users, and information that does not identify any individual, without restriction. Disclosure to third parties of aggregated non-personally identifiable information, including anonymous Demographic Information, may further Design for America's mission and complement internal uses of such information. An example of such disclosure would be the publication of reports for the purpose of encouraging social cooperation drawn from aggregated user information that is displayed in non-personally identifiable form.

We may disclose Personally Identifiable Information that we collect or you provide as described in this Policy to the Watson Foundation, our technical consultants, third-party auditors and other third parties who make the Websites and Services available, enhance their functionality or provide associated services. We may also disclose Personally Identifiable Information to any third party in order to fulfill the purpose for which you provide it (for example, if you provide an email address, picture, or other identifier that you choose to share with other participants).

We will not sell, market, share, rent or otherwise distribute information that we collect or you provide as described in this Policy to others in ways different from what is disclosed in this Policy. Except as otherwise permitted herein, we will only release Personally Identifiable Information to a third party with your consent or to the extent required by law or to exercise our legal rights. Please note that we reserve the right to transfer your Personally Identifiable Information and other information to our successors in business and purchasers of the Websites or Services assets, whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding.

Use of Third-Party Applications, Websites, and Social Networks

- *We may display content from, or provide links to, third-party sites and resources.* The Website and Services display embedded content from, and contain links to, websites and other resources of third parties, including other content partners, survey tools and service providers, which may capture Personally Identifiable Information as you use the Websites and Services. Those third-party websites, applications and resources are not under our control, and you acknowledge and agree that we are not responsible for the collection and use of your information by them or for their content. We encourage you to be aware when you are viewing third-party content via the Websites and Services or are redirected to a third-party website, application or resource, and to review the privacy policies and terms of use of each website, application and resource you visit or use.
- *We may share data with social networks at your request.* If you connect your Design for America user account with social networks or similar services, we may disclose your Personally Identifiable Information to the social network or other service.
- *We may share data with third-party applications that you authorize.* Third-party application developers and service providers (commonly known as “App Developers”) may build services complementary to the Websites and Services, such as a mobile application that interacts with our platform, or may use our content to build unaffiliated applications and services if permitted. If you connect your Design for America user account to a third-party application or service, or approve access to your Design for America user account by a third-party application or service, you consent to Design for America sharing information collected from you or about you, including Personally Identifiable Information, with that third party.
- *We may share data in connection with special programs you participate in.* If you participate in special programs where we partner with third parties, we may share data collected from or about you, including Personally Identifiable Information, with our third party partners to facilitate the program or services being offered. For instance, if you participate in a Studio associated with your school, Design for America may share information about your participation

with your school. These program partners may use your information we share with them as described in their own privacy policies.

- *We use Google Analytics, and may use other third-party analytics tools, to help us measure traffic and usage trends for our website and to understand more about the demographics of our users.* Google Analytics uses cookies and similar technologies to collect and analyze information about the use of our website and report on activities and trends. That service also may collect information regarding your use of other websites, apps and online resources. You can learn more about Google's practices at <http://www.google.com/policies/privacy/partners>, and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.
- *We may participate in interest-based advertising and allow use of third-party tracking technologies on the Websites for this purpose.* We do not display any targeted advertising on the Websites. However, we may participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements on other websites, apps and services, including on Facebook and other social networks, or on other devices you may use. These third-party ad networks use tracking technologies to recognize your browser or device and to collect information about your use of the Websites, in order to provide you customized content, advertising and commercial messages that may be more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. You may be able to opt out of some interest-based advertising using resources such as those of the Network Advertising Initiative at www.networkadvertising.org/choices or the Digital Advertising Alliance at www.aboutads.info/choices.

User Control Over Personally Identifiable Information

If you do not want to provide us with your Personally Identifiable Information, you are not required to, however, while you may still access the Websites, certain Services may not be available to you. By providing your Personally Identifiable Information to us via the Websites or Services, you consent to receive information and updates from us, our representatives, our authorized third-party providers, other members of the Studios in which you participate and other participants in the Services.

We strive to provide you with choices regarding the Personally Identifiable Information you provide to us. For the interactive features of the Websites and Services, we have created mechanisms by which you can opt-in to sharing Personally Identifiable Information with other users, or specified subsets of other users such as members of Studios of which you are a member.

You may contact us at support@designforamerica.com at any time regarding your Personally Identifiable Information and to request corrections to such information, which is accessible by logging into the Websites and visiting your account profile page.

Deletion of Your Account

You have the option, at any time, to remove your Personally Identifiable Information from our servers. All unsubscribe or opt-out requests should be sent to us at support@designforamerica.com, and we will process your request within a reasonable time after receipt.

When you request that we delete your account, Design for America will permanently deactivate your account and remove the Personally Identifiable Information in our servers, subject to the limitations described below. We also will delete other information from our servers, including all posts and messages sent by you, though this process will not eliminate all information about you. For example:

- Posts and direct messages written by others will not be deleted and may contain your name or other information about you.
- Your information in activity logs and archives that we maintain will not be deleted until those logs or archives are deleted according to our normal business practices.
- We will not remove content or information that we may need to comply with our legal obligations, resolve disputes, enforce our agreements, or as otherwise permitted or required by law.
- Information about you that is not personally identifiable, because it has been aggregated or anonymized, will also remain.

We are not responsible for removing your Personally Identifiable Information in the possession of any third party who has previously been provided your information in accordance with this Policy, including other members of your Studio and other participants in the Services to whom you have disclosed your Personally Identifiable Information.

Please note that there might be a brief delay between when you submit your request to "opt-out" and when it is processed and reflected in our systems; accordingly, you may continue to receive communications from us for a limited time after you unsubscribe. We apologize for any inconvenience and appreciate your patience.

Security of Information

Keeping your Personally Identifiable Information secure is a top priority for Design for America. Accordingly, we endeavor to protect your Personally Identifiable Information against unauthorized access or use. However, while we undertake reasonable efforts to prevent unauthorized Internet access to user data retained in our servers, due to the inherent open nature of the Internet, we cannot ensure or warrant the security of any information you transmit to us or any information provided online, and you do so at your own risk. You agree that we are not liable for disclosures of your Personally Identifiable Information due to errors in transmission or unauthorized acts of third parties. As an Internet user, you must accept all risks associated with any data transmission to the Websites, including the risk that your Personally Identifiable Information may be intercepted in transit.

If you choose, or are provided with, a user name, password or any other piece of information as part of our security procedures, you must treat such information as confidential, and you must not disclose it to any other person or entity. You are responsible for the security of your password and will be solely liable for any unauthorized use under such password.

Publicly Accessible Forums, Studios and User Interaction

You should be aware that Personally Identifiable Information which you voluntarily include and transmit online may be viewed and used by others, for example, other members of a Studio you participate in or publicly available forums provided by the Websites and Services. You are solely responsible for the content of messages you post on the Websites' forums, that you share with other participants in a Studio or directly to other users via any interactive feature of the Websites or Services. You should be aware that when you voluntarily disclose Personally Identifiable Information within a publicly accessible forum or directly to other users, that information may be collected and used by others in ways we cannot control. Even if you delete your contributions or messages, copies may remain viewable in cached and archived pages, or might have been copied or stored by other users. Design for America is unable to control such uses of your Personally Identifiable Information,

and by using such features you assume the risk that the Personally Identifiable Information provided by you may be disclosed to and used by third parties.

External Links

The Websites and Services may contain links to other third-party websites. Unless we expressly state otherwise, Design for America makes no representations whatsoever concerning the content of the third-party websites. The fact that Design for America has provided a link to a site is not an endorsement, authorization, sponsorship, or affiliation with respect to such site, its owners, or its providers. There are risks associated with using any information, software, or products found on the Internet, and Design for America cautions you to make sure that you understand these risks before retrieving, using, relying upon, or purchasing anything via the Internet. In addition, we encourage users who leave the Websites to read the privacy statements of other websites that collect personally identifiable information. These other websites may collect or solicit personal data or send their own cookies to your computer.

Please be aware that Design for America is not responsible for the privacy practices of other websites. This Policy applies to all the Websites and not to any webpages not under our domains, regardless of any hyperlinks from the Websites to a webpage not under our domains. Please check the privacy statements of these third-party websites for more information about their policies on collection and use of personal information.

Note to Parents and Children

Design for America is concerned about the protection of online privacy for all Website users. We are particularly respectful of the privacy of young users. We encourage parents to monitor their children's use of the Internet and to help us protect their privacy by instructing them never to provide Personally Identifiable Information on the Websites (or any website) without permission. We will never attempt to collect information from our users, regardless of age, that would not reasonably serve any of the purposes discussed in this Policy. Further, the Websites are intended primarily for adult users 18 years of age and older and are made available under our Terms of Use only to users who are 16 years of age or older. As such, we have no intention of collecting Personally Identifiable Information from children (i.e., individuals under the age of 13). Where appropriate, we take reasonable measures to inform children not to submit such information to our Websites or by other means. If we become aware that a child has provided us with Personally Identifiable Information, we will use all reasonable efforts to delete such information from our database. If you know or suspect that your child who is under the age of 13

has provided us with Personally Identifiable Information, you should contact us immediately if you would like the information submitted by your child deleted from our records:

E-mail: support@designforamerica.com

California Privacy Rights

The California Consumer Privacy Act does not apply to non-profit organizations such as Design for America. However, as a matter of policy we endeavor to provide to all of our users rights such as those accorded to California residents under California law. Therefore, you may request information about our disclosure of personal information to third parties or affiliated companies for their direct marketing purposes. To obtain this information, please contact us at support@designforamerica.com. Please include sufficient personal identification information so that we can process the request. Please also note that this information will be provided only once per calendar year.

If you are under the age of 18, you are entitled to request removal of content or information you have posted on the Websites. You can request deletion of your entire account and remove all of your information on the Websites using the procedures described under the heading “Deletion of Your Account” above. Please note that, as explained there, removal of your content or information does not ensure complete or comprehensive removal of all information relating to you.

Changes to This Privacy Policy

Design for America may amend this Policy from time to time. You are expected to check this page from time to time so that you are aware of any changes. Your continued use of the Websites following the posting of any changes to this Policy indicates your acceptance of such changes.

If we make any material changes in the way we use your Personally Identifiable Information, we will alert you by posting a prominent notice on our site and, if you have provided an email address, by sending you notice via email in order to obtain your consent before using your Personally Identifiable Information in a materially different manner.

Communications

By providing your email address to us, you expressly consent to receive emails from us. We may use email to communicate with you, to send information that you have requested or to send information about other products or services developed or provided by us, provided that, we will not give your email address to another party to promote their products or services directly to you without your consent.

Any communication or material you transmit to us by email or otherwise, including any data, questions, comments, suggestions or similar information (other than Personally Identifiable Information whose treatment is otherwise described herein) will be treated as non-confidential and nonproprietary. Anything you transmit or post will be subject to the license and other rights provided in our Terms of Use. Furthermore, you expressly agree that we are free to use any ideas, concepts, know-how or techniques contained in any communication you send to us without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

Governing Law

The laws of the State of New York (without giving effect to any choice or conflict of law provision or rule) shall govern this Policy regardless of your location. You hereby expressly consent to exclusive jurisdiction and venue in the federal and state courts located in New York, New York, for all matters or disputes arising out of or relating to this Policy or your access or use of the Websites or Services.

Questions or Suggestions

It is important to us at Design for America to hear what visitors and users of the Websites and Services have to say about our services or our policies. If you have any questions, concerns or complaints about this Policy or want to let us know what you think about our services, please contact us at support@designforamerica.com.