

# Privacy Policy

This Privacy Policy governs the manner in which the Invest Detroit Foundation (“Invest Detroit,” “we,” “us,” “our”), a qualified 501(c)(3) non-profit organization, collects, uses, maintains, and discloses information when you use the Invest Detroit websites at investdetroit.com and investdetroit.vc (the “Sites”), including all content, information, and functionality available through the Sites, and any other Invest Detroit products, services, or offerings (hereinafter collectively referred to as the “Services”).

By using our Services, including the Sites, you signify your acceptance of the terms of this Privacy Policy as they may be amended from time to time. By providing information to Invest Detroit, you understand and consent to the collection, maintenance, processing, and transfer of such information in and to the United States and other countries and territories, in accordance with United States law. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

## Collection, Use & Sharing of Information

In order to provide our Services aimed at fulfilling our missions, and to fulfill other purposes as outlined below, we need to collect and process some information. “Personal information” is information that can be used to identify you, and we have provided specific examples of the Personal Information we may collect about you below. Personal Information does not include de-identified or aggregated information, which is information in which identifiable information is removed and that cannot reasonably be used to identify an individual. We may use de-identified or aggregated information for any purpose, and we may share de-identified or aggregated demographic information not linked to any Personal Information with our business partners, trusted affiliates, and in marketing materials.

### *Categories of Personal Information We Collect:*

- **Identifiers**, such as name, mailing address, phone number, email address, financial information, social security number, driver’s license number, and internet protocol address.
- **Demographic information**, such as your gender, age, race or ethnicity, national origin, immigration status, marital status, geographic location, and veteran status.
- **Geolocation** data, such as IP addresses, is gathered when users interact with the Sites.
- **Professional or employment related information** may be collected when you participate in our Services.
- **Internet or other similar network activity**, including information regarding your interaction with the Sites.

*If You Utilize our Services, Here are the Categories of Sources for Personal Information We May Collect:*

- Personal Information from users of the Services through their direct interactions with our Services, including by signing up for our Services and interacting with our Sites.
- publicly available data, including information obtained from public records.
- information from third parties that supplement or ensure the accuracy of Personal Information, including data brokers, licensors, title companies, credit reporting agencies, and entities that provide background checks.
- Personal Information from service providers related to users' interactions with our Services and Sites.

*Why we Collect This Information and What We Do With It:*

- **Identifiers** are collected to contact individuals, provide users with our Services, improve the quality, safety, and security of the Services, customize and improve our Services, administer your account and process payments for Services, comply with internal and organizational compliance and audit requirements, and process requests related to our Services. We may provide this information to third parties and service providers who assist with the facilitation of our Services, including lawyers, banking partners, project/deal partners, title companies, auditors, funders, regulatory agencies, and industry partners and associations. We may share internet or similar network activity with service providers to obtain analytics information, or that assist with our Services, including website hosting, information technology and infrastructure, email service, marketing, credit card process, auditing, or other services.
- **Demographic information** is collected to provide users with our Services, comply with funder and compliance requirements, and evaluate goals and missions of organizations. We may provide this information to our compliance and regulatory organization, funders, and industry partners and associations.
- **Geolocation data** is collected to provide users with our Services, to improve the quality, safety, and security of the Services, to customize and improve our Services, and to detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity. We may share geolocation data with service providers, including our website and marketing vendors, to obtain analytics information concerning our website use.
- **Professional and employment information** may be used to provide users with our Services, customize and improve our Services, administer your account, and process your requests related to the Services.
- **Internet or other similar network activity** is collected to contact individuals, to provide users with our Services, to improve the quality, safety, and security of the Services, to customize and improve our Services, to detect security incidents, and to protect against malicious, deceptive, fraudulent, or illegal activity. We may share internet or similar network activity with service providers to obtain analytics information, or to assist with facilitating our Services, including website

hosting, information technology and infrastructure, email service, marketing, credit card process, auditing, or other services.

In addition, where consistent with applicable laws and regulations, we may disclose Personal Information in all categories above:

- to prepare, negotiate, or perform a contract with you;
- to respond to subpoenas, court orders, or other legal process otherwise required by law or the competent government or judicial authorities;
- to establish or preserve a legal claim or defense;
- as part of corporate restructuring, sale of assets, merger, or divestiture; or
- to prevent fraud or other illegal activities, such as willful attacks on our information technology systems.

## **Choices and Access**

### *Your choices regarding our use and disclosure of Personal Information*

We give you certain choices regarding our use and disclosure of your Personal Information for promotional purposes. You may opt out from receiving electronic communications from us by contacting us at [info@investdetroit.com](mailto:info@investdetroit.com). If you no longer want to receive promotional-related emails from us, you may opt out according to instructions in such communications. Please note that if you opt out of receiving marketing-related messages, we may still send you important administrative messages.

If you are a California resident and have an established business relationship with us, you may request from us: (a) a list of the categories of personally identifiable information, such as name, email address, mailing address, and the type of services provided, that have been disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes and (b) the names and addresses of all such third parties. To request the above information, please contact us at [info@investdetroit.com](mailto:info@investdetroit.com).

### *Access, change, or deletion of Personal Information*

To the extent the rights are provided to you by applicable law, if you would like to request to review, correct, update, or delete Personal Information that you previously have provided to us, please contact us at [info@investdetroit.com](mailto:info@investdetroit.com). Please note that deletion of Personal Information may be limited by applicable law. For your protection, we may need to verify your identity before implementing your request. We will respond to your request consistent with applicable law.

## **Data Integrity and Retention**

The security of your Personal Information is important to us. We employ reasonable

organizational, technical, and physical safeguards designed to protect the Personal Information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your Personal Information. We will only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Data Relating to Children**

Our Services are not directed at, and we do not knowingly collect Personal Information from, anyone under the age of 13. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records. If you wish to have your child's information removed, please contact us using the information below.

### **Changes to This Privacy Policy**

Please note that this Privacy Policy may change from time to time. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. When we do, we will post a notification on the main page of our Sites, revise the updated date at the bottom of this page, and send you an email. We encourage Users to frequently check this page for any changes to our Privacy Policy.

### **Contacting us**

If you have any questions about this Privacy Policy or any of our Services, including the Sites, please contact us at:

#### **Invest Detroit Foundation**

info@investdetroit.com

*January 1, 2021*