

AmeriGives, Inc.
Data Privacy & Security Policy

For nearly 30 years, AmeriGives, Inc. ("AmeriGives") has adhered to the most stringent privacy protection and data security measures in the industry. AmeriGives deeply respects the privacy of both individuals and corporations, and values the confidence of its customers, prospective customers and employees. Therefore, AmeriGives collects and uses personal information in a manner consistent with U.S. privacy laws and **Safe Harbor Principles** developed by the U.S. Department of Commerce and the European Commission.

This Safe Harbor Privacy Policy ("Policy") sets forth the privacy principles that AmeriGives follows with respect to transfers of personal information anywhere in the world. In sum:

1. AmeriGives does not publish or share the names of its clients under any circumstance without the express, written permission from a client who agrees to serve as a business reference.
2. AmeriGives does not use sub-contractors or vendors to perform any services for our customers.
3. AmeriGives does not sell or trade information with third parties for any reason.
4. AmeriGives does not share client information with any other person or entity outside of performing specific duties and fulfilling commitments as directed in writing, by contractual agreement with the client.
5. AmeriGives does not share client employee/donor information with any other person or entity outside of performing specific duties and fulfilling commitments as directed in writing, by contractual agreement with the client.
6. AmeriGives does not share prospective client information with any other person or entity outside of performing specific duties and fulfilling commitments as directed in writing, by non-disclosure agreement or letter of intent with the prospective client.
7. AmeriGives does not share AmeriGives employee information with any other person or entity outside of performing specific duties and fulfilling commitments relating to the verification of an employee's educational history, work history, credit history, work status, identity, conducting a criminal background check and/or the administration of payroll and benefits.

I. SAFE HARBOR

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions (the "Safe Harbor Principles") to enable US companies to satisfy the requirement under European Union law that adequate protection be given to Personal information transferred from the EU to the United States. The EEA also has recognized the US

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Safe Harbor as providing adequate data protection (OJ L 45, 15.2.2001, p.47). Consistent with its commitment to protect personal privacy, AmeriGives adheres to the Safe Harbor Principles by choosing to not share information with any other person or entity outside of performing duties and fulfilling commitments as directed in writing, by contractual agreements with our clients.

AmeriGives has a Director of Data Privacy & Security who ensures compliance with all privacy and data security issues. AmeriGives educates its employees concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. The Director of Data Privacy & Security is available to any individual who may have questions concerning this Policy or data security practices.

II. SCOPE

This Policy applies to all personal information received by AmeriGives in any format including electronic, paper or verbal. AmeriGives collects and processes personal information concerning current and former client employees. AmeriGives will not sell or share this information with third parties. On a global basis, AmeriGives will establish and maintain business procedures that are consistent with this Policy.

Personal information collected by AmeriGives from employees and applicants for employment is maintained at its corporate offices in Stuart, Florida. AmeriGives collects personal information of its own employees for, among other things, legitimate human resource business reasons such as payroll administration; filling employment positions; administration and operations of its benefit programs; meeting governmental reporting requirements; security, health and safety management; performance management; company network access; and authentication. AmeriGives does not request or gather information regarding political opinions, religion, philosophy or sexual preference. To the extent AmeriGives maintains information on an individual's medical health or ethnicity (as legally required), AmeriGives will protect, secure and use that information in a manner consistent with this Policy and applicable law.

Personal information collected by AmeriGives from clients and prospective customers are maintained at its corporate offices in Stuart, FL. AmeriGives collects Personal information for, among other things, legitimate business reasons such as customer service; meeting governmental reporting and records requirements; maintenance of accurate accounts payable and receivable records; internal marketing research; safety and performance management; financial and sales data; and contact information. All Personal information collected by AmeriGives will be used for legitimate business purposes consistent with this Policy and not shared with any other person or entity unless express written permission is received from the client or prospective customer.

III. DEFINITIONS

"Personal Information" means any information or set of information that identifies or could be used by or on behalf of AmeriGives to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly

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available information that has not been combined with non-public Personal information.

"Sensitive Personal information" means personal information that reveals race, ethnic origin, employee status, employee id numbers, email addresses, or that concerns health. In addition, AmeriGives will treat any and all information received from its clients or prospective customers as sensitive information.

IV. PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the seven Safe Harbor Principles.

(1) NOTICE: Where AmeriGives collects Personal information directly from individuals, it will inform them about the purposes for which it collects and uses Personal information about them and the choices and means, if any, AmeriGives offers individuals for limiting the use and disclosure of their Personal information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal information to AmeriGives, or as soon as practicable thereafter, and in any event before AmeriGives uses the information for a purpose other than that for which it was originally collected. AmeriGives may disclose Personal information if required to do so by law or to protect and defend the rights or property of AmeriGives.

(2) CHOICE: AmeriGives will offer individuals the opportunity to choose (opt-out) whether their Personal information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive Personal information, AmeriGives will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

AmeriGives will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

(3) DATA INTEGRITY: AmeriGives will use Personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. AmeriGives will take reasonable steps to ensure that Personal information is relevant to its intended use, accurate, complete and current.

(4) TRANSFERS TO AGENTS: AmeriGives will obtain assurances from its Agents that they will safeguard Personal information consistently with this Policy. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Safe Harbor certification by the Agent, or being subject to another European Commission adequacy finding (e.g., companies located in

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Switzerland). Where AmeriGives has knowledge that an Agent is using or disclosing Personal information in a manner contrary to this Policy, AmeriGives will take reasonable steps to prevent or stop the use or disclosure. AmeriGives holds its Agents accountable for maintaining the trust our employees and customers place in the company.

(5) ACCESS AND CORRECTION: Upon request, AmeriGives will grant individuals reasonable access to Personal information that it holds about them. In addition, AmeriGives will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any AmeriGives employee that desires to review or update their Personal information can do so by contacting AmeriGives' Human Resources Representative.

(6) SECURITY: AmeriGives will take reasonable precautions to protect Personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. AmeriGives protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. AmeriGives limits access to Personal information and data to those persons in the AmeriGives organization, or as agents of AmeriGives, that have a specific business purpose for maintaining and processing such Personal information and data. Individuals who have been granted access to Personal information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

(7) ENFORCEMENT: AmeriGives will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy and the US Department of Commerce Safe Harbor Principles. Any employee that AmeriGives determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

V. DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of Personal information should be directed to the AmeriGives Privacy Office at the address given below. AmeriGives will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between AmeriGives and the complainant, AmeriGives has agreed to participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles.

VI. INTERNET PRIVACY

AmeriGives regards the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with clients, prospective clients,

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business partners and others. AmeriGives recognizes the importance of maintaining the privacy of Personal information collected through websites that it operates. AmeriGives' sole purpose for operating its websites is to provide information concerning products and services to client employee/donors and recipient organizations. Visitors can reach AmeriGives on the Web without revealing any Personal information. Visitors on the Web may elect to voluntarily provide Personal information via AmeriGives "Contact Us" feature, but are not required to do so. AmeriGives collects information from visitors to the websites who voluntarily provide Personal information by requesting information on services or seeking employment. The Personal information voluntarily provided by website users is contact information limited to the user's name, home and/or business address, phone numbers and email address. AmeriGives collects this information so it may answer questions and forward requested information. AmeriGives does not sell or share this information with third parties.

AmeriGives may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. None of this information is reviewed at an individual level. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. If visitors do so, however, some areas of AmeriGives websites may not function properly.

AmeriGives does not create or maintain any websites directed toward children. Nevertheless, AmeriGives is committed to complying with applicable laws and requirements, such as the United States' Children's Online Privacy Protection Act ("COPPA").

AmeriGives website users have the option to request that AmeriGives not use information previously provided, correct information previously provided or remove information previously provided to AmeriGives. Those that would like to correct or suppress information they have provided to AmeriGives should forward such inquiries to:

AmeriGives Privacy Inquiries
Attention: Director of Data Privacy & Security
2793 SE Monroe Street
Stuart, FL 34997

The inquiries should include the individual's name, address, and other relevant contact information (e.g. phone number, email address). AmeriGives will use all reasonable efforts to honor such requests as quickly as possible.

AmeriGives' websites may contain links to other "non-AmeriGives" websites. AmeriGives assumes no responsibility for the content or the privacy policies and practices on those websites. AmeriGives encourages all users to read the privacy statements of those sites as their privacy practices may differ from those of AmeriGives.

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VII. CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

The practices described in this Policy are current Personal data protection policies as of September 1, 2006. AmeriGives reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.

In addition, AmeriGives' Board of Directors shall review this Policy on an annual basis and ensure that any and all changes be effectively communicated to the aforementioned parties contained within this document.