

Effective date: January 19, 2017

## PRIVACY POLICY

### 1. OVERVIEW

This privacy policy describes how Relationships First, Inc. (“we,” “our,” “us”) maintains, uses and shares information that we may collect when you use our website at [www.relationshipsfirst.org](http://www.relationshipsfirst.org) (the “Site”), our mobile application(s) (the “App”) and any other programs, presentations, information, materials, products or services that we may offer from time to time by means of the Site or the App (collectively, together with the Site and the App, the “Services”).

We may change this privacy policy from time to time. Any such changes will be posted here. If we make a material change in the way we use your Personal Information (as defined below), we will prominently note the change on the Services.

**2. WHAT PERSONAL INFORMATION DO WE COLLECT.** Some of the information we may collect when you use the Services, such as your name, postal address, email address or telephone number, or, if you buy something, your credit/debit card or other payment information, may allow you to be identified. We call this type of information “*Personal Information*.”

### 3. HOW WE COLLECT AND USE PERSONAL INFORMATION.

- (a) **Chatrooms, Blogs or other Forums.** We may provide an opportunity for you to post information to a chatroom or forum, as a comment to a blog entry or by means of other publicly accessible areas of the Services. If we do so, any information that you provide may be publicly displayed. We urge you not to provide any Personal Information, including any information regarding health or medical matters, or anything else that you wish to remain private, in such a context.
- (b) **Surveys.** We may ask you to complete surveys or opinion polls from time to time. Participation is voluntary. We only use and publicly disclose the information that we collect from surveys or polls in an aggregate manner, not in individually identifiable form, for purposes of research, fundraising and education and to allow us to improve our Services and how we serve our constituency.
- (c) **Inquiries.** If you send us a comment or question or make an inquiry to customer support, we will retain the information that you provide to us for the purpose of responding to you, as well as for improving the Services.
- (d) **Visitors.** If you are just visiting the Services and not requesting information, making a purchase, contacting us or otherwise voluntarily submitting Personal Information, we do not ordinarily collect any Personal Information about you except through web logs, as described below. In that case, we obtain the information that you provide and will use it to respond to your inquiry or request. We do not share any of this information with anyone else, except to respond to your request, if you consent, or as otherwise described in this privacy policy.
- (e) **e-Commerce.** If you pay for something on the Services, and you furnish your credit/debit card number or other payment information for such purpose, we will only use this information to fulfill your purchase.
- (f) **Web Logs.** We maintain web logs that automatically record basic information about everyone who visits the Services. We use web log information to help us design our website, to identify popular features, to improve our services, and for other managerial and analytic purposes. These logs contain:
  - The Internet domain from which you access the Services.
  - Your IP address.
  - The type of browser and operating system that you use.
  - The date and time you visited the Services.
  - The pages that you visited on the Services.
  - The address of the website you linked from to get to the Services.

- (g) **Cookies.** We use cookies and may use similar technologies to help you navigate the Services, to allow us to learn how you use the Services, and to improve the Services. Cookies are text files we place in your computer's browser to store your preferences. Cookies, by themselves, do not reveal any Personal Information unless you choose to provide this information to us by, for example, making a purchase. From time to time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Services. If we do so, the information provided to such third parties will not include Personal Information. The use of cookies by any partners or service providers is not covered by our privacy statement. We will not have access to, or control over, these cookies.
- (h) **Links to Other Websites.** The Services may include links to other websites whose privacy practices differ from ours. If you submit Personal Information to any of those sites, your information will be governed by their privacy policies.
- (i) **Communicating with You.** We may use your Personal Information for the purpose of communicating with you and responding to your inquiries.
- (j) **Affiliates.** We may share your Personal Information with our affiliated organizations or their principals to allow them to communicate with you about matters that we believe may be of interest to you.
- (k) **Service Providers.** We at times contract with third party service providers to perform functions for us. These service providers may be given access to the information we collect for the purpose of performing those functions, but they will be contractually bound to maintain the confidentiality of the information and not to use it for any other purpose.
- (l) **Social Media; Streaming.** The Services may include social media features, such as links that allow you to follow us on Facebook. These features may collect information about your IP address and which page you are visiting on the Services, and they may set a cookie to make sure the feature functions properly. You may also be able to view Content by means of Facebook or another social media service, or through a third party streaming platform such as Roku or YouTube. Your interactions with these features are subject to the privacy policies of the companies that provide them.
- (m) **Geolocation.** If you use a mobile device to access the Services, we may collect certain additional information. We may receive information about your location and your mobile device, including a unique identifier for your device, your mobile operating system, and the type of mobile Internet browser that you use. We may use this information for research purposes or to facilitate providing you with services. Most mobile devices provide users with the ability to disable location services.
- (n) **Business Transfers.** If we were to transfer all or substantially all of our assets to another organization, one of the assets we would likely include in the transfer is our database of Personal Information.
- (o) **Disclosures for Legal Reasons.** We will disclose Personal Information when we are required to do so by law, regulation or securities exchange requirements, for example, in response to a court order or subpoena. We also may disclose such information in response to a law enforcement agency's request or when we believe such disclosure is appropriate to protect our legal rights or to safeguard anyone's property or safety.

#### 4. YOUR PRIVACY CHOICES

If you would like us to stop sending you email or other communications or would like to access your registration information to correct or delete it, you may send us a request using the contact information at the end of this Privacy Policy. We will fulfill any opt-out requests within ten (10) business days. We take reasonable steps to ensure that the information we collect is reliable for its intended use, accurate, complete and current.

#### 5. DO NOT TRACK.

We do not note if you set your web browser to send a "do not track" or similar request when you visit our Services, and doing so will not affect the performance of the Services.

#### 6. SECURITY

We use reasonable efforts to maintain the security of all Personal Information, including technological safeguards, but cannot guarantee that an unauthorized breach or disclosure of such information could never occur.

#### 7. CHILDREN

The Site and the App are intended for use by adults. Neither the Site nor the App target children under the age of 13, nor do we knowingly collect any Personal Information by means of the Site or the App from children under the age of 13.

## **8. ACCOUNTABILITY**

We are committed to adhering to our privacy policy and applicable laws and to making your online experience secure and valuable. If you have a question, request, complaint, dispute or concern related to this privacy policy, you may send a message by email to [info@pomeroylawgroup.com](mailto:info@pomeroylawgroup.com) or by postal mail to Pomeroy Law Group PLLC, Attention: Relationships First, 54 W. 40<sup>th</sup> St., New York NY 10018. We will work with you to obtain a prompt resolution of any issues you may have.