

*Last Updated: September 29, 2023*

## Privacy Policy

Common Ground, a Michigan nonprofit corporation with offices at 1410 S. Telegraph Road, Bloomfield Hills, Michigan 48302 ("Company" "we", "us" or "our") is committed to protecting the privacy of personal information you provide when you visit our website and all other websites, social media sites, mobile sites, services, applications, platforms and tools where this Privacy Policy appears or is linked (collectively, the "Site"). This Privacy Policy explains the information we may collect during your visit to our Site and how we use, share, and store that information.

Before using the Site, please carefully read this Privacy Policy. By using the Site, creating an account, providing information to us (by any means, whether in correspondence, via our Site, or otherwise), or using our services, you acknowledge that you have read, understood, and consent to be bound by this Privacy Policy.

**IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY OR OUR PRACTICES, YOU MAY NOT USE OUR SITE.**

### Changes to this Privacy Policy

This Privacy Policy was published on the date "Last Updated" above.

We may occasionally modify this Privacy Policy, so please check back periodically because any information that you submit after a change has been posted will be subject to the modified Privacy Policy.

**YOUR CONTINUED USE OF OUR SITE CONSTITUTES YOUR ACCEPTANCE OF THOSE CHANGES.**

### The Personal Information We Collect About You

Personal information, means any information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual ("personal information").

We may collect, use, store and transfer different kinds of personal information about you via our Site or in the course of providing services to you which we have grouped together follows:

- **Identity Data** includes first name, last name, social security number, username or similar identifier, date of birth, telephone number, email address.
- **Government Issued Identity** includes driver's license, state identification.
- **Professional or Employment-Related Data** includes your company name, your job title, and your company contact information.
- **Contact Data** includes street address, city, state, zip, email address and telephone numbers.

- **Financial Data** includes payment card details, account numbers, security codes and expiration dates.
- **Commercial Transaction Data** includes details about our transactions with you and other details of products and services you have purchased from us.
- **Internet or other Electronic Network Activity Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site, and information about how you use our Site, products and services.
- **Outreach and Communications Data** includes your preferences in receiving communications (for example: newsletter and other email communications you elect to receive) from us and our third parties and your communication preferences.

This personal information is required to provide the Site to you. If you do not provide personal information we ask for, it may delay or prevent us from providing certain products and/or services to you.

### Collection of Personal Information

We primarily collect your personal information when you provide it to us voluntarily in person, by telephone, text or email and/or through our Site, or, for Company's customers, when you login to our Site using your username and password. For example, we collect Personal Information when you register for an event, purchase a product, or participate in other activities on our Site to be able to provide you information related to these registrations.

However, we may also collect information:

- From publicly accessible sources;
- Directly from third parties (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent;
- From cookies on our Site; and
- Via our IT systems, including automated monitoring of our Site and other technical systems, such as our computer networks and connections, communications systems, and email and instant messaging systems.

### How We Use Your Personal Information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances: (a) where we need to perform the contract we are about to enter into or have entered into with you; (b) where it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests; (c) where we need to comply with a legal or regulatory obligation; or (d) where you have given consent.

We use your data in the following ways:

- To fulfill your request or other purposes for which you provided it, including to provide you with our products and/or services;
- To register you as a new guest, user, or customer;
- To process registrations, scheduling and service requests;
- To manage our relationship with you;
- To enable you to complete web forms or survey;
- To administer and protect our Site;
- To ensure business policies are adhered to, e.g. policies covering security and internet use;
- To prevent and detect fraud against you or us;
- To prevent unauthorized access and modifications to systems;
- To deliver relevant Site content to you;
- To use data analytics to improve our Site, services, outreach communications, client relationships and experiences;
- To make suggestions and recommendations to you about services that may be of interest to you;
- To send you information about our programs, services, and upcoming events as well as other materials that we think may be of interest to you;
- For operational reasons, such as improving efficiency, training and quality control;
- To ensure the confidentiality of commercially sensitive information; and
- To update and enhance customer records.

### Who We Share Your Personal Information With

We routinely share personal information with:

- Service providers we use to help deliver our products and/or services to you, such as payment service providers;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers; and
- Our banks.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information and only to the extent such services providers need access to such information to perform the services we request. We reserve the right to release personal information about you when we believe that such disclosure is necessary or appropriate to comply with applicable law or to protect the safety or property of visitors to our Site, the public, the Company, our affiliates or our personnel.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations. We may also need to share some personal information with other parties, such as potential buyers of some or all of our business

or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Except as described in this Privacy Policy, Company will never share, trade, sell, or otherwise disclose personal information to third parties without informed consent or direction, except where required by law.

### Aggregate and Non-Personal Information

Company may use the personal information you provide in an aggregate form. Such aggregated information is not considered personal information for purposes of this Privacy Policy and we may use it for any purpose, including but not limited to, for our internal program, research and general marketing purposes, such as generating statistics, developing plans for promoting our services and to better understand the audience attending our programs. Some service providers with whom we share information may use it in aggregate form for their internal business purposes, such as generating statistics for marketing materials, but they may not use your personal information for any other purpose and may not share it with other parties.

We may also collect certain non-personal information about your use of the Site (e.g., to determine which pages of our Site are most popular and to improve use of the Site). We may collect IP addresses to analyze trends, administer our Site, track traffic patterns, and gather demographic information for aggregate use. We may share this aggregated non-personal information with our affiliates, licensees and partners, and may post analyses and statistics based on the aggregated data on the Site or use the data for research or promotional purposes relating to our mission.

### Cookies

Company also may use “cookies” to collect information about visitors to our Site. A “cookie” is a small text file that a website places on your computer's hard drive to make it easier to use certain website functions or to collect information about your activities on the website. The cookie transmits this information back to the website. Many users do not know that “cookies” are placed on their computers when they visit websites. If you want to prevent this from happening, you can set your browser to warn you when a website attempts to place a cookie on your computer. Please note that if you disable cookies you may lose some functionality on our Site.

We may use cookies to analyze how visitors, in the aggregate, use our Site to make it as useful as possible. We do not collect or store personal information through the use of cookies. We use cookies for our customer login so that when customers return to our Site, they can access customers only content without having to sign back into the Site.

### Security

Providing security for the personal information that you submit is a top priority. We use generally accepted industry standards to protect the personal information we collect, both during transmission and once we receive it. We endeavor to protect the personal information we

receive, gather and store, by such means as encryption, access control procedures, network firewalls, physical security, and other measures intended to protect the information that you provide to us. These measures increase the security and privacy of information traveling to, from, and within Company. Only our authorized employees or agents carrying out permitted business functions are allowed to access personal information.

Please be aware, however, that no physical or electronic security system is impenetrable. We cannot guarantee the security of our servers or databases, nor can we guarantee that the information that you supply to us will not be intercepted during transmission over the internet. Any such transmission of information by you over the internet is at your own risk.

We will maintain a record of every breach of security safeguards involving personal information under our control. We will notify you of any breach of our security safeguards involving your personal information if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to you.

#### [Location of Servers; Transfer of Information to the United States; Other Transfer](#)

Our servers are located in the United States. If you are located outside of the United States, be aware that the information you provide will be transferred to the United States. If you are a non-U.S. user of the Site, by using our Site or providing your personal information to us, you acknowledge and agree that your personal information may be processed for the purposes identified in this Privacy Policy. If you choose to access our Site outside the United States, we and our service providers may transfer your personal information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. Where the laws of your country allow you to do so, by using the Site or the services or by providing your personal information, you consent to the transfer and to the collection, storage, processing and use of your personal information in the United States, which may not offer an equivalent level of protection to that required in the country where you reside, as described in this Privacy Policy. In addition, our service providers may not be located in your geographic area in the United States; by using the Site or the services or by providing your personal information on the Site, you also consent to the transfer and to the collection, storage, processing and use of your personal information to these service providers, as described in this Privacy Policy. If you do not want your personal information transferred to the United States of America, please do not submit any information to us or use our Site or the services.

#### [How Long Your Personal Information Will Be Kept](#)

We will keep your personal information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or

- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

### Third Party Websites

Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect personal information or anonymous data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. As such, we urge that you exercise caution before providing them with your personal information. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content or to any collection of your personal information after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

You should contact the site administrator for such third party website if you have any complaints, claims, concerns or questions regarding such third party website or its privacy practices.

### Children

Our Site is not directed to children and we will not knowingly allow anyone under the age of 13 to use the Site or to provide us with any personal information. Children always should get permission from their parents before sending any information about themselves (such as their names, email addresses and phone numbers) over the Internet. If you are under 13, please do not use our services, access the Site, or provide any information about yourself. If a child under 13 submits personal information to us and we learn that the personal information is the information of a child under 13, we will, in compliance with the Children's Online Privacy Protection Act, delete the information as soon as possible and cancel the corresponding accounts. If you believe that we might have any personal information from a child under 13, please contact us (see the "Contact Us" Section below). Please visit the FTC's website at [www.ftc.gov](http://www.ftc.gov) for tips on protecting children's privacy online.

### Promotional Communications and Opt-Out

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

Message and data rates may apply. We do not charge a fee for our text message programs and assume no responsibility for charges by your carrier that you may incur when you sign up to receive text messages from us.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How We Use Your Personal Information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other third party organizations for marketing purposes.

If you do not wish to receive promotional communications (e.g., by e-newsletters, e-mail messages, or postal mailings about Company’s programs and services), you can opt out of receiving such promotional communications at any time by:

- Updating your account profile settings; or
- Using the unsubscribe option in the messaging sent to you or “STOP” number in texts.

If you need assistance in completing this request, please inform us by sending an e-mail to: [askcommonground@commongroundhelps.org](mailto:askcommonground@commongroundhelps.org). Please indicate if you wish to discontinue receiving promotional communications sent through only certain methods but not others.

We may ask you to confirm or update your preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business. You may receive a final confirmation message to confirm that you will no longer receive email or text messages from the applicable program unless you opt back into such program.

### [Contact Us; Comments and Questions](#)

We strive to ensure that your visit to our Site is a satisfactory one and that your privacy is respected. If, unless prohibited by applicable law, you wish to correct, update, or delete your personal information or if you have any questions, comments, or concerns about our Privacy Policy or our practices, you may contact us by sending an e-mail to [askcommonground@commongroundhelps.org](mailto:askcommonground@commongroundhelps.org), or by mail to Common Ground at 1410 S. Telegraph Road, Bloomfield Hills, Michigan 48302. Please note: We are not obligated to correct, update, or delete your personal information if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person’s behalf.