

**LAST MODIFIED DECEMBER 2018**

This Privacy Policy applies to all of the services and websites offered by Herren Project, Inc., a Rhode Island not for profit corporation (together with its subsidiaries or affiliated companies, the “Company” or “we”).

**1. INFORMATION WE COLLECT**

*We may collect the following types of information:*

**Information you provide** – When you contact us, we ask for your personal information. We may combine the information you submit to third parties in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.

**Cookies** – When you visit the Herren Project’s web pages, we send one or more cookies to your computer or other device. We use cookies to improve the quality of our service, including for storing user preferences, improving search results and ad selection. Herren Project also uses cookies in its advertising services to help advertisers and publishers serve and manage ads across the web.

**Login information** – When you access Herren Project’s web pages via a browser, application or other client service, servers automatically record certain information. These server logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser or your account.

**User communications** – When you send email or other communications to Herren Project, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you send and receive SMS messages to or from one of our services that provides SMS functionality, we may collect and maintain information associated with those messages, such as the phone number, the wireless carrier associated with the phone number, the content of the message, and the date and time of the transaction. We may use your email address to communicate with you about our services or website.

**Third-party applications** – Herren Project may make available third-party applications, such as gadgets or extensions, through its services. The information collected by Herren Project when you enable a third-party application is processed under this Privacy Policy. Information collected by the third-party application provider is governed by their privacy policies.

**Location data** – Herren Project may offer location-enabled services (such as GPS signals sent by a mobile device) or information that can be used to approximate a location (such as a cell ID or IP address).

# PRIVACY POLICY

**Other sites** – This Privacy Policy applies to Herren Project’s services and website only. We do not exercise control over the sites displayed as search results or links from within our various services or websites. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

*In addition to the above, we may use the information we collect to:*

**Improve our services** – Provide, maintain, protect, and improve our services (including advertising services) and develop new services; and

**Protect rights** – Protect the rights or property of Herren Project or our clients. If we use this information in a manner different than the purpose for which it was collected, then we will use a good faith effort to ask for your consent prior to such use.

## 2. CHOICES

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features and services may not function properly if your cookies are disabled.

## 3. INFORMATION SHARING

*Herren Project only shares personal information with other companies or individuals outside of the Company in the following limited circumstances:*

**Consent** – We have your consent. We require opt-in consent for the sharing of any sensitive personal information.

**Subsidiaries and Affiliates** – We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

**To Comply with the Law** – We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) detect, prevent, or otherwise address fraud, security or technical issues or (c) protect against harm to the rights, property or safety of Herren Project, its users or the public as required or permitted by law.

## 4. INFORMATION SECURITY

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.



# PRIVACY POLICY

We restrict access to personal information to Herren Project employees, contractors and agents who need to know that information in order to process it on our behalf. These individuals are often bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## 5. ACCESSING AND UPDATING PERSONAL INFORMATION

We will make a good faith effort to provide you with access to any of your personal information which we have collected and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others or would be extremely impractical (for instance, requests concerning information residing on backup tapes). In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services, after you delete your information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

## 6. ENFORCEMENT OF AND CHANGES TO THIS PRIVACY POLICY

Herren Project regularly reviews its compliance with this Privacy Policy. When we receive formal written complaints, it is Herren Project's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Herren Project and an individual.

Please note that this Privacy Policy may change from time to time. We will post any Privacy Policy changes on this webpage and, if the changes are significant, we will use good faith efforts to provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## 7. CONTACT

If you would like to submit a comment or complaint about our privacy practices, you can do so by sending a letter outlining your concerns to: Herren Project, Box 131, Portsmouth, RI 02871.

## 8. INTERNET AND SOCIAL MEDIA ENGAGEMENT DISCLAIMER

You expressly acknowledge that you assume all responsibility related to the security, privacy, and confidentiality risks inherent in sending any content over the internet. By its very nature, a website and the internet cannot be absolutely protected against intentional or malicious intrusion attempts. Herren Project does not control the third-party sites and the internet over which you may choose to send confidential personal or health information or other content and, therefore,



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Herren Project does not warrant safeguard against any such interceptions or compromises to your information. When posting any content on an internet site, you should think carefully about your own privacy in disclosing detailed or private information about yourself and your family. Furthermore, Herren Project does not endorse any product, services, views or content displayed by others on Herren Project's websites.

By posting any comments, posts or other material on Herren Project's blogs or social media sites, you give Herren Project the irrevocable right to reproduce, distribute, publish, display, edit, modify, create derivative works from and otherwise use your submission for any purpose in any form and on any media.

You agree that you will indemnify Herren Project against any damages, losses, liabilities, judgments, costs or expenses (including attorney's fees and costs) arising out of a claim by a third party relating to any material you have posted.

When you post a comment to a social media site, including but not limited to: Twitter, Facebook, blogs, multimedia or other user-generated content, it is published for the world to see. For your own privacy and that of your family, you should consider how much detailed personal and medical information is linked to your name.

