

## The Cantor Fitzgerald Relief Fund website privacy policy

This Privacy Policy was last updated on September 6, 2019.

### OUR POLICY

Welcome to the web site (the “**Site**”) of The Cantor Fitzgerald Relief Fund (“**The Fund**”, “**we**”, “**us**” and/or “**our**”).

The Site is operated by The Fund and has been created to enable our visitors (“**you**”, “**your**”) to view and receive information about the Fund and its initiatives and projects (including with participating charities), to enable you to register and participate in or apply for activities on the Site including participating in auctions and making donations as well as contacting us and receiving information displayed on the Site (“**Activities**”). This Privacy Policy sets forth our policy with respect to information including personally identifiable data (including, by way of example, name, address, preferences, credit card number, billing address) (“**Personal Data**”) and other information that is collected from visitors to the Sites. This Privacy Policy also sets out the choices you have in relation to the way we use your Personal Data.

Please make sure you carefully read this Privacy Policy and understand how we use your Personal Data. If you have any questions about this Privacy Policy or our practices please contact us at [info@cantorrelief.org](mailto:info@cantorrelief.org) or on 001-212-829-4770.

For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”), your data will be controlled by The Fund

### INFORMATION WE COLLECT

We will only collect information about you when you are willing to provide it. You are not legally required to provide us with any information, but in order to access and participate in Activities, ask us questions or give us feedback, etc. you will need to provide with certain details.

**Personal Data That You Provide Through the Site:** We may collect the following personal data from you:

- **Identity and Contact Data**, including your name, address, telephone number, email address, and other personal data concerning your preferences relevant to the Site and Activities;
- **Financial and Payment Data**, including your and other data necessary for processing

payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information. This may include the use of third party payment providers such as PayPal and certain credit card, and other payment providers which you select;

- **Profile and Usage Data**, including passwords to the Site or parts thereof, password protected platforms or services, your preferences in receiving information from us, your communication preferences and information about how you use the Site including the Activities and information you viewed or searched for, page response times, download errors, length of visits and page interaction information (such as scrolling, clicks, and mouse-overs). To learn more about our use of cookies or similar technology please check our cookies section below;
- **Technical Data**, including information collected during your visits to the Site, the Internet Protocol (IP) address, login data, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform. To learn more about our use of cookies or similar technology please check our cookies section below;
- **Physical Access Data**, relating to details of your visits to our stores for collection of products you purchased.

**Statistical information:** We use statistical information which may include Personal Data for aggregated anonymized analysis. Our Site receives and stores certain aggregated anonymized information. Such information, which is collected passively using various technologies, is not used to specifically identify you. We use this information to understand how our Site is performing. The types of information we collect include the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers.

## COOKIES

In operating the Site, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access a Site. Our cookies help provide additional functionality to our Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access a Site without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features.

**Aggregated Personal Data:** In an on-going effort to better understand and serve visitors to the Site and the aims and goals of The Fund, its initiatives, and Activities, The Fund often conducts research on its visitors and donor demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and The Fund may share this aggregate data with its affiliates, agents, charities and partners. This aggregate information does not identify you personally. The Fund may also disclose aggregated user statistics in relation to initiatives and projects including charities and to other third parties for other lawful purposes.

We also use Google Analytics, to monitor the performance of our website and platform for optimization and to monitor performance of certain functionalities. For more information about Google Analytics please go to [https://support.google.com/analytics/topic/2919631?hl=en&ref\\_topic=1008008](https://support.google.com/analytics/topic/2919631?hl=en&ref_topic=1008008)

## **OUR USE OF YOUR PERSONAL DATA AND OTHER INFORMATION**

The Fund uses the Personal Data you provide as necessary and in a manner that is consistent with this Privacy Policy.

We may use your Personal Data for the following purposes to:

- process any donations you make using the website, including contacting you if we have any query regarding such donations or responding to any of your queries;
- allow you to access and participate in Activities;
- deal with any queries or other matters that may arise where you participate in any Activity via the Site;
- contact you (including by post, email and SMS) about the Fund;
- improve your browsing experience by developing and improving the design and layout of the Site, through analysis of your usage;
- contact you for your feedback;
- contact you to provide you information about Activities which may be of interest to you, subject always to your consent (if applicable) or your chosen marketing preferences (which you can update at any time);
- contact you in relation to any Activities that you have entered or subscribed to;
- for research, analysis and risk management; and
- enable us to comply with any legal or regulatory requirements and in the detection and prevention of theft, fraud or other crimes.

## **MARKETING**

Where you have contacted us via participation in an Activity or via an email address or telephone number we have provided, we may, in turn, contact you, including but not limited, to keep you up to date about the Fund and its initiatives and projects. If you do not want to receive updates or be contacted, you can let us know at any time. You can do this either by emailing us at [info@cantorrelief.org](mailto:info@cantorrelief.org)

If The Fund intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to such use Personal Data and, if required, your consent will be obtained.

## OUR DISCLOSURE OF YOUR PERSONAL DATA AND OTHER INFORMATION

The Fund is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

**Third Party Sites:** Where we provide visitors with the ability to access Third Party Sites via the Site (including for the purpose of Activities) and you chose to do so, limited technical information may be provided to those Third Party Sites concerning you for those purposes.

**Affiliates, Agents, Consultants and Third Parties:** The Fund sometimes hires or uses other entities, including affiliates, to perform certain functions. Examples of such functions include personnel, mailing information, maintaining databases, managing usage and reviews, and moderation and processing payments. When we use another company to perform services on our behalf we only provide them with the information that they need to perform their specific function. In some cases these third parties may request additional information directly from you in order to carry out their services, these third parties may have their own privacy terms which we recommend you review.

**Legal Requirements:** The Fund may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of The Fund, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

**Business Transfers:** We might be involved in a sale, merger, reorganization, dissolution or similar event and Personal Data may be part of the transferred assets. We will only disclose your information in relation to such potential transactions where it is necessary to do so.

## DATA TRANSFERS

If you provide Personal Data to the Site, you acknowledge that such Personal Data will be transferred from your home country to The Fund and third parties (as referred to in this Privacy Policy) to the United States. We take measures to provide an appropriate level of data privacy protection. For example, where applicable we use approved standard contractual clauses, intragroup agreements, and other measures designed to ensure that recipients of your personal information protect it.

## YOUR CHOICES

You can use the Sites without providing any Personal Data (other than identified under the cookies section). If you choose not to provide any Personal Data, you may not be able to participate in certain Activities or receive certain information.

## EXCLUSIONS

This Privacy Policy does not apply to any Personal Data collected by The Fund other than Personal Data collected through the Site. This Privacy Policy shall not apply to any unsolicited information you provide to The Fund through the Site or through any other means. This includes, but is not limited to, any ideas for new initiative or projects or modifications to existing initiatives and projects, and other unsolicited submissions (collectively, “**Unsolicited Information**”). All Unsolicited Information shall be deemed to be non-confidential and The Fund shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

## CHILDREN

The Fund does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Sites. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on the Sites without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to The Fund through the Sites, please contact us, and we will endeavor to delete that information from our databases.

## LINKS TO OTHER WEB SITES

This Privacy Policy applies only to the Sites. The Sites may contain links to other web sites not operated or controlled by The Fund (including but not limited to in relation to auctions, donations, and purchase of books) (the “**Third Party Sites**”). The policies and procedures we describe here do not apply to the Third Party Sites. The links from the Sites do not imply that The Fund endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies. If you do not wish them to collect your Personal Data then you should not access the Third Party Sites.

## SECURITY AND DATA RETENTION

The Fund takes reasonable steps to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error-free. In particular, email sent to or from the Site may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to The Fund via the Internet.

We will only keep your Personal Data for as long as required in order for you to use the Site and participate in Activities. In some cases, we may retain Personal Data for longer periods where we are required to do so under applicable law.

## CHANGE TO THE FUND’S PRIVACY POLICY

We may make changes to this Privacy Policy in order to comply with our legal or regulatory obligations, to reflect a change in our business or updates to the Site. The Fund reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

## **ACCESS TO INFORMATION: CONTACTING THE FUND**

To keep your Personal Data accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via the Sites.

You may contact us as follows: [info@cantorrelief.org](mailto:info@cantorrelief.org) or on 001-212-829-477.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Applicable California privacy legislation permits visitors who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request to access such information, please contact us at [info@cantorrelief.org](mailto:info@cantorrelief.org) or on 001-212-829-477. Within thirty (30) days of receiving such a request, we will provide a list of the categories of Personal Data disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties (if any). This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

## **YOUR EUROPEAN PRIVACY RIGHTS**

The GDPR entitles European residents certain rights in relation to their Personal Data. Under certain circumstances, if you are a European resident by law you have the right to:

- update, modify, delete or obtain (commonly known as a “subject access request”) a copy of the Personal Data that we hold on you; or
- restrict or stop us from using any of the Personal Data which we hold about you;

you can request this by contacting [info@cantorrelief.org](mailto:info@cantorrelief.org). We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

Where appropriate, we will respond to your requests relating to your Personal Data in writing or by email. If you require our response in a different format, please let us know.

If you are not happy with the way that we have handled your Personal Data or a data subject request you also have the right to lodge a complaint with a supervisory authority, in particular (for EU based individuals) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns>