

TURKISH PHILANTHROPY FUNDS, INC.

Privacy Policy

Adopted on October 28, 2009

Revised in April 2016

Reviewed and Revised in May 2018

This policy describes what personal data we collect, how we use it, and your choices.

We collect information from you when you visit and take actions on our website. We use this information to provide the services you've requested. We use cookies (such as Google Analytics) to provide a better experience and improve our website and web beacons and similar technologies to track usage patterns.

We have updated our Privacy Policy to take into account the new requirements of the General Data Protection Regulation ("GDPR").

By continuing to access or use tpfund.org (our 'Website'), you agree to be legally bound by this Privacy Policy and the Terms of Service. These Terms and Supplementary Terms may be modified from time to time and the changes will be posted on our Website (we will notify you of these where appropriate).

Our Commitment To Privacy

Your privacy is important to us. To better protect your privacy Turkish Philanthropy Funds provides this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our website and at every point where personally identifiable information is requested.

Information Collection

Turkish Philanthropy Funds, Inc. is the sole owner of the information collected on its website. We do not share, sell, or exchange this information.

Turkish Philanthropy Funds, Inc. collects information from the users of its website at several different points on the site. We use our visitors' Internet Protocol (IP) addresses to analyze trends, administer the site, track their movement and gather broad demographic information for aggregate use, however the IP addresses are not linked to personally identifiable information.

When you make an online donation on www.tpfund.org, we collect personal data such as your name, billing address, and email address, if you have not previously provided these details

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during a prior session. We collect information about your donation, including the project you are donating to and the amount of your donation. We also collect (but do not retain) credit card numbers which are processed by a third-party payment vendor subject to the Payment Card Industry Data Security Standards. If you use PayPal, Apple Pay, or a similar service, their use of your information is based on their terms of service and policies, not ours, so we encourage you to review those policies carefully.

We only collect personal data that is reasonable or necessary to accomplish the purpose of your interaction with Turkish Philanthropy Funds as a visitor to our Website. You may choose not to provide this information but you need to understand that as a result, you may not be able to engage in certain activities on the Website. Any personal data provided by you as a visitor to the Website will be used only as described in this Privacy Policy.

When you make a donation in honor or memory of a loved one, we collect payment and contact information about you, as well as the name, email address, and mailing address of the recipient. You may create a personal message to the recipient, which is stored on our servers. Except in the limited circumstances described below, we do not read or use your personal messages.

Periodically, Turkish Philanthropy Funds may invite you to participate in contests, take advantage of special promotions, and complete online surveys. Information we collect from these contests, promotions, and surveys may be associated with you personally.

When you create a fundraiser for a project on Turkish Philanthropy Funds, we collect information about projects you propose or wish to support. Turkish Philanthropy Funds notifies the project leader when a fundraiser is established for their project, but does not share your personal data with the project leader or the project. Remember, however, that anything you post on your fundraiser site will be seen by visitors to the Website.

If you donate to a fundraiser, then we will also share your name and the date and amount of your donation with the person who created the fundraiser unless you elect to be anonymous.

Use of Information

Turkish Philanthropy Funds uses the personal data that you provide or we obtain, and the technical information logged by our servers to process your donations, to:

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- Process your donations; contact you regarding any questions related to your donation. Use of this data is **necessary for the performance of the contract** between you and us in connection with your donation. If you do not provide the necessary data to our payment service provider, or us we will not be able to process your donation.
- Comply with our **legal obligations**.
- Send you updates on how your donation has been used, project appeals, newsletters, events, matching opportunities, information about Turkish Philanthropy Funds, and projects we think we think will be of interest to you. We will we will only send you this information by email if you **consent** to us doing so at the time you provide us with your personal data. You may opt out of receiving such emails by following the instructions contained in each email we send you.
- As necessary for certain **legitimate interests**, which include the following:
 - Notify your friends and family about your donation in their honor if you ask us to;
 - Using the technical information logged by our servers when you visit our Website (described above) to improve your experience on our Website (such as remembering your name, the items in your Cart, or your preferences) and preventing fraudulent activity;
 - If you ask us to delete your data or to be removed from our marketing lists and we are required to fulfill your request, we will keep basic data to identify you and prevent further unwanted processing;
 - We may anonymize the information that we collect and use such anonymized data for statistical and market research purposes, including sharing it with affiliates, business partners, and academic researchers;
 - Operate the Website and our business; and
 - Compile aggregate statistics that allow us to understand how visitors or registered users use our Website, and to make improvements in design and content to better serve you.

Disclosure of Personal Data

We will share your personal data with our agents, representatives, service providers and contractors in order to process your donations, offer you services in connection with our Website, communicate news and information about Turkish Philanthropy Funds, provide customer service, notify the project(s) you elect to support about your donation, and complete financial transactions. These service providers are authorized to use your personal data only to the extent necessary to serve these purposes, or as otherwise authorized by this policy. **Except**

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for the purposes outlined herein, we will not trade, share, or sell a donor's personal data with anyone else.

Unless you ask us not to, we share your personal data under the following circumstances:

- When you **donate to a project**, we share your name and contact information and the amount of your donation with the **project leader and organization running that project**.
- When you **donate to a fundraiser**, we share your name and the date and amount of your donation with the **person who created the fundraiser**.
- When you make a donation that is part of a **campaign sponsored by your employer**, and/or when your employer is being asked to match your donation, we will share your name, email address and the amount of your donation with your employer.
- Each time you make a donation, however, **we will give you the opportunity to tell us not to share your personal data** in the ways described above (except in the case of employer matched donations) by selecting to be "**anonymous**" during the checkout process.

If Turkish Philanthropy Funds merges with, or becomes an affiliate of another organization, we will ensure the confidentiality of any personal data involved in such transactions and provide notice before personal data is transferred and becomes subject to a different privacy policy.

We may also be required to disclose your personal data in the following circumstances: (1) we need to respond to a subpoena, court order or legal process, including to meet national security or law enforcement requirements; (2) an emergency situation requires disclosure before your permission can be obtained (e.g., situations involving potential threats to personal safety), or; (3) we determine that disclosure is needed to protect our rights or property, or the rights or property of another person, in which case we will implement appropriate safeguards to ensure that your personal data continues to be protected.

We may share aggregated demographic and statistical information with our other partners. This is not linked to any personal data that can identify any individual person.

Turkish Philanthropy Funds uses industry-standard 256-bit Secure Sockets Layer (SSL) encryption on all web pages where personal or sensitive information is required. This encryption allows your data to be safely transmitted over the Internet without being intercepted, read, altered, or deleted by a malicious third party. The encrypted data goes to a physically secure location where your information is stored on restricted-access computers located at restricted-access sites.

If you use the social sharing features on this website to inform a friend about our site, you will be asked to provide for the friend's name and email address. Turkish Philanthropy Funds stores

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this information for the sole purpose of sending a one-time e-mail and will not add your friend to our mailing list.

Employee Access, Training and Expectations — Our organization values, ethical standards, policies and practices are committed to the protection of user information. In general, our business practices limit employee access to confidential information, and limit the use and disclosure of such information to authorized persons, processes and transactions.

Cookies

Like most websites, our servers automatically collect certain technical information when you visit our Website, including your IP address, browser type, browser language, the date and time of your visit, the referring URL, and, if you have visited our Website before, one or more cookies that may uniquely identify your browser. We also collect information about your activities on the Website, such as the pages you access.

In order to collect this information, the Website places a cookie on your hard drive. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. We also use web beacons and other technologies to track usage patterns.

We use several tools to collect information about use of this Website. These tools collect information such as how often you visit this Website, what pages you visit when you do so, what elements you interact with, what other sites you used prior to coming to this Website, or 3rd-party audience data (such as age, gender and interests). We use the information we get from these tools to improve our Website, for website analysis and statistics and respond to service requests you make.

Where required by the law, when you first visit the Website, you will be asked to consent to the use of cookies on the Website, and if you accept we will store cookies on your computer.

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. For additional security, credit card information is not stored on our web site.

Unless you ask us not to, we also share your personal information when you make a donation:

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- When you donate to a registry, fundraiser, or giving group, we share your name and the date and amount of your donation with the person who created the fundraiser, registry, or group.
- When you make a donation that is part of a campaign sponsored by your employer, and/or when your employer is being asked to match your donation, we will share your name, email address and the amount of your donation with your employer.
- When you donate to a project, we share your name and contact information and the amount of your donation with the project leader.
- Each time you make a donation, however, we will give you the opportunity to tell us not to share your personal information and stay as an anonymous donor.

Our Commitment To Children's Privacy

Tpfund.org is a general audience website and does not collect information about a visitor's age. We do not knowingly collect or store any personal data about children under the age of 16 and we do not offer any of our products or services directly to children under the age of 13.

If you are under 13, do not use or provide any information on this website or on or through any of its features or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information as soon as practicable. If you believe we might have any information from or about a child under 13, please contact us at info@tpfund.org

Your Rights

Right to access: You can request all your personally identifiable information that we collect online and maintain by Turkish Philanthropy Funds by e-mailing info@tpfund.org. We use this procedure to better safeguard your information.

We do our best to keep your data accurate and up to date, to the extent that you provide us with the information we need to do so. If your data changes (for example, if you have a new email address), then you are responsible for notifying us of those changes.

Upon request, we will provide you with a copy of the information that we have.

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Right to erasure: If you wish to delete your account or have your information removed from our system, you can do so by sending an email to info@tpfund.org. For privacy and security, requests must come from the email address tied to your account.

Right to rectification: If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. You can correct factual errors in your personally identifiable information by calling us at 646-530-8988 or by sending us an email at info@tpfund.org that credibly shows the error(s). To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections. If we shared your personal data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

Right to restrict processing: You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it (please read below for information on your right to object). We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

Right to data portability: You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will give you your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

Upon request, we will provide you with a copy of the information that we have.

Right to object: You may ask us at any time to stop processing your personal data, and we will do so:

- If we are relying on a legitimate interest (described in this Privacy Policy) to process your personal data -- unless we demonstrate compelling legitimate grounds for the processing; or
- If we are processing your personal data for direct marketing.

Right to withdraw consent: If we rely on your consent to process your personal data you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.

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Right to lodge a complaint with the data protection authority: If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the Information Commissioner's Office (ICO) (details on how to do so can be found on [the ICO's website](#)) or other data protection authority that is authorized to hear those concerns.

Retention

We will retain donor's information for as long as needed to provide our services. We may also retain and use your personal data in order to comply with our contractual or legal obligations, audit requirements, resolve disputes, and prevent abuse.

Links to Other Websites

This website contains links to other sites. Other websites have their own privacy policies. When you provide personal data at one of those sites, you are subject to the privacy policy of the operator of that site, such as Classy, not the Turkish Philanthropy Funds Privacy Policy. To learn more about Classy's Privacy Policy, [click here](#). We encourage you to read that policy before submitting any personal data. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by this website.

You should take additional steps to safeguard your personal data online. To learn more about how to protect yourself, visit the [**Federal Trade Commission website**](#).

Safeguarding Your Information

Turkish Philanthropy Funds understands the importance of keeping your information secure and confidential. We take reasonable and appropriate measures to protect personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal data.

Data Storage

Your data will be stored on servers of our hosting service providers in the United States (Amazon Web Services). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and US and EEA data protection legislation.

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Legal Disclaimer

We may disclose personal information when required by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law or comply with legal process served on the Turkish Philanthropy Funds. Although we use security that we believe to be appropriate to protect your personal information, we do not guarantee that our security precautions will protect against, and we expressly disclaim any liability for, any loss, misuse, or alteration of your personal information.

How To Contact Us

Should you have other questions or concerns about these privacy policies, please call us at (646) 530-8988 or send us an email at info@tpfund.org.

Changes to this Privacy Policy

Our Privacy Policy is regularly reviewed to make sure we continue to serve the privacy interests of our customers. If our information practices change materially, we will notify you of these policy changes by posting them on the privacy page of this website and we will ensure that these changes are brought to your attention.