

# **Website Privacy Policy**

Effective Date: October 31, 2021

### Introduction

Phila Engaged Giving, LLC ("Phila" or "We") respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.philagiving.com (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy does not apply to information collected by:

- us offline or through any other means, including on any other website operated by any third party;
  or
- any third party, including through any application or content (including advertising) that may link to or be accessible from the Website. Third party sites operate independently of Phila and Phila does not have any control over the privacy practices of these sites. When you click on one of these third party links, you are entering another website for which Phila has no responsibility. This privacy policy does not cover the information practices or policies of such third parties. We strongly encourage you to review the privacy policies of any site you visit.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Notice). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

You must be at least 18 years old to use our Website. Our policy is that we do not knowingly collect, use, or disclose personal information about users that are under 18 years of age. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at the email address listed below.

### Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name and email address ("personal information");
- that does not identify a specific individual, either by itself or in combination with other information, such as age or gender. This information may include details about your internet connection, the equipment you use to access our Website and usage details, the Uniform Resource Locator ("URL") that you accessed before our Website, which URL you go to next, what web browser you are using,

and your Internet Protocol ("IP") address; and

- that you provide to us, including:
  - o The information we collect on or through our Website.
  - o Information that you provide by signing up for newsletters and filling in forms on our Website. It is optional for you to engage in these activities.
  - o Records and copies of your correspondence (including email addresses) if you contact us.
  - Your responses to surveys that we might ask you to complete for research purposes. It is optional for you to complete a survey.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site.

## Information We Collect Through Automatic Data Collection Technologies.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information or we may maintain automatically collected information or associate such information with personal information that we collect in other ways or receive from third parties. This information helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Recognize you when you return to our Website.

These automatic data collection technologies, include "cookies" and "web beacons." Cookies are small amounts of data that are stored within your internet browser, which saves and recognizes your browsing habits. Phila uses both session cookies (which track a user's progression during one site visit) and persistent cookies (which track a user over time). Web beacons are web page elements that can recognize certain types of information on your computer or mobile device, such as the time and date you viewed a page, which emails are opened, which links are clicked, and similar information.

#### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.

- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- In any other way we may describe when you provide the information.
- To send you marketing communications from us if (i) you made a purchase or asked for information from us about our products or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.
- For any other purpose with your consent.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide, as described in this privacy policy:

- To contractors, service providers, and other third parties we use to support our business, including payment processors.
- To respond to support requests.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Phila's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Phila about our Website users is among the assets transferred.
- To third parties who conduct marketing studies and data analytics. These third parties may combine your information with the information of other consumers for purposes of conducting these studies and/or analytics. For instance, we use the Google Analytics demographics and interest reporting features. You may opt out of the Google Analytics reporting features by following the instructions at this link: https://tools.google.com/dlpage/gaoptout/.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Phila, our customers, or others.

We use a third-party payment processor to handle payment transactions. As of the Effective Date of this

policy, our third-party payment processor is QuickBooks. You can read about QuickBooks's privacy practices in the QuickBooks Privacy Statement located here: https://www.intuit.com/privacy/statement/. We encourage the adoption of privacy policies by our contractors, service providers, and other third parties we use to support our business, but the use of your personal information by these third parties is governed by their privacy policies (if any) and is not subject to Phila's control.

#### "Do Not Track" Requests

Your internet browser and mobile device may allow you to adjust your browser settings so that "do not track" requests are sent to the websites you visit. Phila does not respond to "do not track" signals at this time.

# **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

You may also unsubscribe or opt out of receiving commercial communications from us by clicking the unsubscribe link on any email marketing communication you receive.

#### **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website, and we are not liable for any unlawful acts of others who obtain your personal information.

#### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if such purposes can be achieved by other means, and legal requirements.

In some circumstances we may anonymize your personal information for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Changes to Our Privacy Notice**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### **California Residents**

California residents may have additional personal information rights and choices as set forth below in the

California Consumer Privacy Act Addendum.

# **European Union Residents**

European Union residents may have additional personal information rights and choices as set forth below in the GDPR Addendum.

# **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Phila Engaged Giving 1817 Queen Anne Ave N, Suite 403 Seattle, WA 98109 info@philagiving.com

## California Consumer Privacy Act Addendum

This California Consumer Privacy Act Addendum supplements the information contained in the Phila Engaged Giving, LLC ("Company," or "we" or "us") Privacy Policy and applies solely to all visitors and users of the Website who reside in the State of California ("consumers" or "you"). We adopt this Addendum to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Addendum.

#### **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, including health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA).

In particular, we have collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier,	YES
	online identifier, Internet Protocol address, email address,	
	account name, Social Security number, driver's license number, passport number, or other similar identifiers.	
B. Personal	A name, signature, Social Security number, physical	YES
information	characteristics or description, address, telephone number,	1123
categories listed in	passport number, driver's license or state identification card	
the California	number, insurance policy number, education, employment,	
Customer Records	employment history, bank account number, credit card	
statute (Cal. Civ.	number, debit card number, or any other financial	
Code §	information, medical information, or health insurance	
1798.80(e)).	information. Some personal information included in this	
. , ,	category may overlap with other categories.	
C. Protected	Age (40 years or older), race, color, ancestry, national origin,	NO
classification	citizenship, religion or creed, marital status, medical	
characteristics	condition, physical or mental disability, sex (including	
under California or	gender, gender identity, gender expression, pregnancy or	
federal law.	childbirth and related medical conditions), sexual orientation,	
	veteran or military status, genetic information (including	
	familial genetic information).	
D. Commercial	Records of personal property, products or services purchased,	NO
information.	obtained, or considered, or other purchasing or consuming	
	histories or tendencies.	
E. Biometric	Genetic, physiological, behavioral, and biological	NO
information.	characteristics, or activity patterns used to extract a template	

	or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

# Collecting, Using, and Sharing Personal Information

Please see our Privacy Policy above for details about how we collect, use, and share and use your personal information.

# Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category F: Internet or other similar network activity.

Category K: Inferences drawn from other personal information.

We have disclosed your personal information for a business purpose to service providers.

### **Sales of Personal Information**

In the preceding twelve (12) months, Company has not sold personal information.

# **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see section below titled "Exercising Access, Data Portability, and Deletion Rights"), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased; and
  - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for business-to-business personal information.

### **Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see section below titled "Exercising Access, Data Portability, and Deletion Rights"), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- 3. Debug products to identify and repair errors that impair existing intended functionality.
- <u>4.</u> Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- <u>6.</u> Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- <u>7.</u> Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 8. Comply with a legal obligation.
- 9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for business-to-business personal information.

### Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at info@philagiving.com
- Visiting www.philagiving.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to

info@philagiving.com.

# Changes to this Addendum

We reserve the right to amend this Addendum at our discretion and at any time. When we make changes to this Addendum, we will post the updated Addendum on the Website and update the Addendum's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

# **Contact Information**

If you have any questions or comments about this Addendum, the ways in which Company collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.philagiving.com Email: info@philagiving.com

### **GDPR Addendum**

The EU's General Data Protection Regulation (GDPR) provides individuals that are residents of the European Union (EU), European Economic Area (EEA) and Switzerland with specific rights regarding their Personal Data. This GDPR Addendum to the Phila Engaged Giving, LLC ("Phila") Website Privacy Policy (the "Privacy Policy") addresses those rights. Additionally, as of the effective date of this GDPR Addendum, the UK is covered by the GDPR but has taken steps to adopt laws that mirror the GDPR that are intended to go into effect following the UK's departure from the EU. References to the GDPR in this Privacy Policy are intended to cover the UK's replacement laws. The UK, Switzerland and the countries of the EU and EEA are collectively referred to herein as the "Designated Countries".

This GDPR Addendum should be read in conjunction with the Phila Website Privacy Policy, which provides a description of all of our data collection, use and disclosure practices with respect to our Phila website <a href="https://www.philagiving.com">www.philagiving.com</a> (the "Website") and marketing activities. Capitalized terms used herein and not otherwise defined shall have the respective meanings provided in the GDPR.

1. General. We may ask you to identify which country you are in when you interact with us, or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in a Designated Country. If any terms in this Addendum conflict with other terms contained in the Privacy Policy, the terms in this Addendum shall apply to users (defined below) from Designated Countries.

Phila is a data Controller with regard to any Personal Data collected from visitors pursuant to an interaction. A "Controller" is an entity that determines the purposes and the manner in which the Personal Data is Processed. Any third parties that handle your Personal Data in accordance with our instructions are our service providers and are "data processors." You are a "user." Users are individuals providing Personal Data to us via an interaction, such as requesting to receive information regarding our services or otherwise accessing or using our resources that we provide.

**2. Legal Basis.** Our legal basis for collecting and using the Personal Data as described in our Privacy Policy will depend on the Personal Data concerned and the specific context in which we collect it. We have set out below a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may Process your Personal Data for more than one legal basis depending on the specific purpose for which we are using your Personal Data. Please contact us at info@philagiving.com if you need details about the specific legal ground we are relying on to Process your Personal Data where more than one ground has been set out in the table below.

### **Purpose for Processing**

- We may Process your Personal Data to provide the Website and facilitate the interactions. Specifically, we may Process your Personal Data to:
  - deliver information to you and contact you regarding administrative notices;
  - o respond to your requests, inquiries, comments and concerns;
  - o personalize your interactions with us;
  - o provide technical, product and other support for the Website and our services;
  - better understand you and/or maintain and improve the accuracy of the records we hold about you.

This use of your Personal Data is necessary for our legitimate interests (managing our business, providing the Website and services), provided our interests are not overridden by your rights and {CHD2491568.DOCX;7/16755.000001/}

interests. Please note that you have a right to object to Processing of your Personal Data where that Processing is carried on for our legitimate interest. This use of your Personal Data is sometimes also necessary in order for us to comply with legal obligations. In certain cases, users also provide their express consent to these data uses.

- we may provide Personal Data to our suppliers and third-party service providers that help us provide, operate, analyze and improve the Website and interactions. This use of your Personal Data is necessary for our legitimate interests (managing our business, providing our Website and services, improving our Website and services and studying how users use our Website and services), provided our interests are not overridden by your rights and interests. This use of your Personal Data is sometimes also necessary in order for us to comply with legal obligations. In certain cases, users also provide their express consent to these data uses.
- We may use Personal Data to evaluate and improve the Website, our services, and our other products (i.e., identify usage trends and for data analysis, including for purposes of research, audit and reporting) and to develop new products, services, features and benefits. This use of Personal Data is necessary for our legitimate interests (managing our business, providing our services, keeping our records updated, studying how users use our Website and services, developing our Website and services, defining types of clients for our services, and informing our marketing strategy), provided our interests are not overridden by your rights and interests.
- We may use Personal Data to engage in advertising and marketing efforts and provide you with special offers and other information about the services as well as other products, events of ours, our affiliates, and non-affiliated third parties. This use of Personal Data is necessary for our legitimate interests (studying how users use our Website and services, to develop our Website and services, to grow our business and to inform our marketing strategy), provided our interests are not overridden by your rights and interests.
- We may share and transfer Personal Data if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control. This use of Personal Data is necessary for our legitimate interests (managing our business and providing our Website and services), provided our interests are not overridden by your rights and interests. This use of your data is sometimes also necessary in order for us to comply with legal obligations.

#### We may also share Personal Data:

- (i) as required or permitted by law, including any requirements from government agencies and taxing authorities; (ii) if we determine that disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency or other legal process; (iii) to protect the rights, privacy, property, interests or safety of Phila or our affiliated companies, customers, employees or the general public; (iv) to pursue available remedies or limit damages; (v) to enforce Phila's agreements; and (vi) to respond to an emergency. This use of your Personal Data is necessary in order for us to comply with legal obligations. This use may also be necessary to protect vital interests.
- **3. Transfer of Personal Data Outside of the Designated Countries.** To the limited extent that it is necessary to transfer Personal Data outside of the Designated Countries, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such Personal Data, including standard contractual clauses under Article 46.2 of the GDPR. Please contact us if you wish to obtain information concerning such safeguards.
- **4. International Transfers.** Phila is located in the USA. Therefore, any Personal Data we collect will be collected and stored in the USA. For users that are in the Designated Countries, this means that their Personal

Data will be stored in a jurisdiction that offers a level of protection that may, in certain instances, be less protective of their Personal Data than the jurisdiction the user is typically a resident in. Please note that Phila uses safeguards designed to protect the privacy and integrity of such Personal Data. Please contact us at info@philagiving.com if you wish to obtain information concerning safeguards we employ when transferring Personal Data outside of the Designated Countries.

- **5.** Additional Privacy Rights. We provide you with the rights described below when you interact with us. We may limit these privacy rights (a) where denial of access is required or authorized by law, (b) when granting access would have a negative impact on others' privacy, (c) to protect our rights and properties, or (d) where the request is frivolous or burdensome. If you would like to exercise your rights under applicable law, please contact us at info@philagiving.com. We may seek to verify your identity when we receive your privacy rights request to ensure the security of your Personal Data.
  - **Right to withdraw consent.** For any consent-based Processing of your Personal Data, you have the right to withdraw your consent. A withdrawal of consent will not affect the lawfulness of our Processing or the Processing of any third parties based on consent before your withdrawal.
  - Right of access/right of portability. You may have the right to obtain information about the categories of your Personal Data that we are Processing, the purposes for which we Process that Personal Data, and how we share that Personal Data, among other things. You also have the right to access the Personal Data that we hold about you, and in some circumstances, have the Personal Data provided to you so that you can provide that Personal Data to another Controller.
  - **Right to rectification.** You may request for us to correct or rectify any inaccurate or incomplete Personal Data we hold about you in our files.
  - Right to erasure. In certain circumstances, you may have a right to the erasure of your Personal Data that we hold on you.
  - Right to restriction. You have the right in some circumstances to request that we restrict our Processing of your Personal Data, such as where the accuracy of the Personal Data is contested by you.
  - **Right to object to Processing.** You have a right to object to any Processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to Process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.
  - **Rights to file a complaint.** If you believe we are unlawfully Processing your Personal Data, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.htm.
  - Notification to third parties. When we fulfill your individual rights requests for correction (or rectification), erasure or restriction of Processing, we will notify third parties also handling the relevant Personal Data unless this proves impossible or involves disproportionate effort. Upon your request, we will identify such third parties.
- 6. **Exercising Your Rights.** If you wish to exercise one of these rights, please contact us at info@philagiving.com. Please include your name and email address with your request. Before we can process any such request, we will need to verify your identity through the email address or telephone number associated with your interactions, and confirm your request prior to fulfilling any such request and reserve the right to deny a request where we are unable to satisfactorily complete this process. If you authorize someone

to make a request on your behalf, we may also deny your request if we are unable to verify that the individual making the request is authorized to act on your behalf. We will respond to all such requests as soon as reasonably possible and, in any event, within timelines required by GDPR. Phila does not and will not discriminate against you for exercising your rights under GDPR.

- **7. Third Party Providers/Sub-Processors.** We may use third party service providers (known as sub-processors) to facilitate use and operation of the Website and/or for other activities related to the interactions and our other business activities. We share some Personal Data with these sub-processors to help us provide, manage, secure and improve the Website and related to our interactions. Your Personal Data may be provided to and used by such sub-processors in furtherance thereof. Some of our subprocessors have privacy and security practices in place to ensure compliance with the GDPR and have contractual requirements to protect the privacy and security of the Personal Data that they sub-process.
- **8.** Changes To This Addendum. We reserve the right to change this GDPR Addendum from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the top of this Addendum. Your continued use of the Website or our services or other interactions with us after we make changes is deemed to be an acknowledgment of those changes, so please check this GDPR Addendum periodically for updates.