PRIVACY POLICY

Our Privacy Policy explains how Sigma Gamma Rho and some of our related entities or companies (collectively, “COMPANY”, “we”, “us”, or “our”) we may work with collect, use, or disclose personal information and data we receive through use of our website (“Site”), mobile applications, and any other online services we offer (collectively, the “Services”).

The policy also gives you choices about the collection and use of your information. We collect data about users of our Site, Services, or applications and about members of our organization and those seeking to become members of our organization (and these individuals about whom we collect data are referred to as “you” in this Privacy Policy). Please read the Privacy Policy carefully before you start to use our Services. By using the Services, you agree that you understand and that you will abide by the Terms of Use and our Privacy Policy. If you do not agree to the Terms of Use and our Privacy Policy, or if you violate them in any way, your right to access or use the Services is terminated.

Please see Section 13 of the Terms of Use regarding restrictions on your legal rights in any dispute involving our Services, Terms of Use or Privacy Policy.

You understand that we may revise and update the Privacy Policy from time to time in our sole discretion. Where appropriate, we may seek to provide advance notice before an updated Privacy Policy becomes effective. You agree that we may notify you of the updated Privacy Policy by posting it on the Services (such as on our Site), and that your use of the Services after the effective date of the updated Privacy Policy (or engaging in such other conduct as we may reasonably specify) constitutes your agreement to the updated Privacy Policy. It is your responsibility to check the Privacy Policy posted on the Services periodically so that you are aware of any changes, as they are binding on you.

By using the Services, you represent and warrant that you are of legal age to form a binding contract with COMPANY and meet all of the eligibility requirements in the Terms of Use.

1. INFORMATION WE COLLECT

We collect personal information about you in a number of ways, as listed below. When you provide us with your Personal Information, we will process it in accordance with this Privacy Policy. If you do not wish us to process your Personal Information in this way, please do not provide us with that Personal Information.

- We collect the following Personal Information that you voluntarily provide when you access, use or receive our Services:
  - Username and Password
  - Personal Information
    - Examples of Personal Information include your name, email address, address, and phone number.
  - Payment information
If you use the Service to make or receive payments, we will also collect certain payment information, such as credit card, PayPal or other financial account information, and billing address.

User Contributions
- Information you provide to post to the Services (e.g., photos, comments, and other materials) along with any information you provide about yourself and the content.
- Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, where we are permitted by law to collect this information.

Communications
- Communications between you and COMPANY. For example, we may send you emails regarding COMPANY, payment confirmations, the Services, or technical and security notices. Note that you may not be able to opt out of certain Services-related e-mails.

We also automatically collect Personal Information about you indirectly about how you access and use the Services and the information about the device you use to access the Services. For example, we may collect the following:

- Analytics information:
  - We may use third-party analytics tools to help us measure traffic, usage, and sales trends by your use of our Services. These tools collect information sent by your device or the Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services.

- Cookies and similar technologies:
  - When you use the Services, we may use “Cookies” which are small files stored as text on a computer hard drive.
  - Some of the Cookies we use are required to enable core site functionality, for example to provide secure log-in or to remember certain account settings, but we also use Cookies and other similar technologies like pixels, web beacons (also known as “clear GIFs”), and local storage to collect information about how you use the Services and provide features to you.
  - We may also ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party.
  - If you do not want information collected through the use of cookies, most browsers allow you to change your cookie settings or reject cookies altogether. Please note that if you choose to refuse cookies you may not be able to use the full functionality of the Site. These settings will typically be found in the “options” or “preferences” menu of your browser.

Mobile Device Unique Identifier
2. HOW WE USE YOUR INFORMATION

In general, we use Personal Information to:

- Provide you with customer support;
- Help you efficiently access your information after you sign in;
• Remember information so you will not have to re-enter it during your visit or the next time you visit the Services;
• Provide personalized content and information to you and others, which could include online ads or other forms of marketing;
• Provide, improve, test, and monitor the effectiveness of the Services;
• Develop and test new products and features;
• Monitor metrics such as total number of visitors, traffic, and demographic patterns; or
• Diagnose or fix technology problems.

We may use Personal Information for any purpose otherwise allowed by applicable law.

3. SHARING OF YOUR INFORMATION

We are not in the business of selling personal information about our users to third parties without your consent, except as noted in this Policy.

• Parties with whom we may share your information:
  o Third Party Affiliates
    ▪ With your consent, we may either employ or partner with third party companies for the purposes of advertising, facilitating, or enhancing our Services. In order for these third party companies to carry out their services, your personal Information and other data collected may be shared with these third party companies (including, without limitation, maintenance services, database management, web analytics and improvement of our Services).
  o Government, courts, and Law enforcement.
    ▪ We may share your Personal Information with government or law enforcement officials, regulators or other parties as required by law or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) comply with and respond to claims and legal process (including, but not limited to, subpoenas); (c) respond to requests from public or government authorities, including public or government authorities outside your country of residence; (d) enforce the terms of our agreement (such as our Terms of Use) or other COMPANY governing documents, policies, or procedures to allow us to pursue available remedies or limit the damages that we might sustain; (e) to protect the security or integrity of the property, privacy, safety and rights of the COMPANY, our affiliates, members, you or a third party.

• Parties with whom you may choose to share your User Contributions:
  o With your consent, if you voluntarily share or submit any information (e.g., name) or content (e.g., picture), or commentary (e.g., forums, message boards, chats) for posting
to the Services, or link it to any social media platforms, that post and any content or information associated with it may become available to the public.

4. HOW WE STORE YOUR INFORMATION

Storage and Processing:

- We will store your Personal Information for no longer than necessary for the purposes set out in our Retention Policy and in accordance with our legal obligations and legitimate business interests.
- As an international sorority, our affiliates and service providers are located around the world. The Personal Information we collect may therefore be transferred to and stored in countries outside of the jurisdiction you are in. Any international transfers of your Personal Information are made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the European Commission. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this privacy policy.
- Although we implement appropriate technical and organizational measures ("TOMS") designed to protect your Personal Information from accidental or unlawful destruction, loss, change or damage. Additionally, the TOMS are in place to protect your Personal Information from unauthorized access. Although we cannot ensure the security of any information you transmit to or guarantee that this information will not be accessed, disclosed, altered, or destroyed, we will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored Personal Information in the manner prescribed by any applicable data privacy laws in your jurisdiction of residence.

5. YOUR RIGHTS AND CHOICES IN RESPECT OF YOUR PERSONAL INFORMATION

- Your account information and profile/privacy settings:
  - Emails
    - In all promotional emails, you will be given the opportunity to opt-out of receiving such messages in the future by clicking on the link at the bottom of the email that says “unsubscribe.” It may take up to ten (10) business days for us to process your opt-out request.
    - Please note, we reserve the right to send you Services-related communications (e.g., account verification, payment confirmations, technical and security notices) that you may not opt out of.
    - Even if you have unsubscribed from receiving promotional emails from us, we may send you other types of important email communications without offering you the opportunity to opt-out of receiving them, such as customer service announcements and administrative notices.
  - Mobile device unique identifier
    - Unless you choose to opt out, we may also share your mobile phone number with certain select third parties. You can opt out by changing the privacy settings on your cell phone.
• If you are a resident in the European Economic Area, under European law you have the following rights in respect of your personal information that we hold:
  o Right of access. You have the right to obtain:
    i. Confirmation of whether, and where, we are processing your Personal Information;
    ii. Information about the categories of Personal Information we are processing, the purposes for which we process your Personal Information and information as to how we determine applicable retention periods;
    iii. Information about the categories of recipients with whom we may share your Personal Information; and
    iv. A copy of the Personal Information we hold about you.
  o Right of portability. You have the right, in certain circumstances, to receive a copy of the Personal Information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
  o Right to rectification. You have the right to obtain rectification of any inaccurate or incomplete Personal Information we hold about you without undue delay.
  o Right to erasure. You have the right, in some circumstances, to require us to erase your Personal Information without undue delay if the continued processing of that Personal Information is not justified.
  o Right to restriction. You have the right, in some circumstances, to require us to limit the purposes for which we process your Personal Information if the continued processing of the Personal Information in this way is not justified, such as where the accuracy of the Personal Information is contested by you.
  o Right to object. 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.
  o You also have the right to lodge a complaint with your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

• If you wish to exercise one of these rights, please contact us at webmaster@sgrho1922.org. If you are a member of Sigma Gamma Rho, you may also review and edit the Personal Information you have submitted to us by logging into your Account on http://www.sgrho1922.org/.

6. CHILDREN’S PRIVACY

COMPANY does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for the Services without first obtaining the consent of such persons parent or guardian. The Services and their content are not directed at children under the age of
13. In the event that we learn that we have collected personal information from a child under age 13 without parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact COMPANY using the Contact page.

IF YOU ARE A CALIFORNIA RESIDENT UNDER THE AGE OF 18, DO NOT SHARE ANY PERSONAL INFORMATION ON ANY FORUM OR MESSAGE BOARD. If you do post any Personal Information, you can remove it using Services functionality. This removal may not be complete given the nature of the Internet. Contact us at webmaster@sgrho1922.org for assistance.

7. HOW WE RESPOND TO DO NOT TRACK SIGNALS

COMPANY does not track its users over time and across third party websites to provide targeted advertising. COMPANY does not respond to Do Not Track (DNT) signals and handles all user information consistent with its Terms of Use and this Privacy Policy.

8. OTHER WEB SITES AND SERVICES

The Services may contain links to other websites or services that we do not own or operate. We are not responsible for the practices employed by any websites or services linked to or from the Services, including the information or content contained within them. Your browsing and interaction on any third-party website or service, including those that have a link on our Services, are subject to that third party’s own rules and policies, not ours.

In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Contributions. If you are using a third-party website or service and you allow them to access your User Contributions you do so at your own risk.

9. HOW TO CONTACT US

Please direct questions or concerns about this Privacy Policy or the Services to COMPANY at webmaster@sgrho1922.org or by mail at: Sigma Gamma Rho International Headquarters, 1000 Southhill Dr., Suite 200, Cary, NC 27513.

The effective date of this Privacy Policy is October 1, 2018.