



Your privacy is important to us, and we want to make sure you understand exactly how we use your data when you entrust your information with us.

Lakou NFP (“we” or “us”) developed this Privacy Policy (“Privacy Policy”) to provide you with information on how we process your Personal Data when you visit the Lakou.org website and other websites and applications, including mobile applications, on which this Privacy Policy is posted, linked, or referenced (“Lakou Sites and Apps”).

Other Lakou websites and apps that do not include a link to this Privacy Policy and include a link to a different privacy policy are governed by that privacy policy.

“Personal Data” is information relating to an identified or identifiable natural person.

## **Categories of Personal Data Processed, including Personal Data Processed through Cookies**

Personal Data that is processed when you submit a “Contact Us” form through the website: When you contact us online, we may collect Personal Data, including your name, company name, job title, business email address, department, and reason for contact, which may tell us that you need help logging in, you would like to learn more about Lakou, you are interested in a career at Lakou, or you have a question about your current program.

We may also create event logs that are useful in diagnosing performance-related issues and capturing information relating to the client support or service issue. To improve client service, subject to applicable laws, we may also record and review conversations with client support specialists, and analyze any feedback provided through voluntary client surveys. With your consent, we may log in to your account, if appropriate, to help troubleshoot and resolve your issue.

### **Purposes and Legal Grounds:**

If you are contacting us to ask questions, request help logging in to your account, or request more information about Lakou, we use this information to provide you with appropriate support. If you are contacting us because you are interested in a career at Lakou, we use this information to provide you with relevant information about potential career opportunities at Lakou. We also use this information to monitor the quality and types of support that we provide. The legal ground for processing this information for these purposes is Lakou’s legitimate interest in providing quality support to users’ requests for assistance and information.

Lakou may also process the Personal Data of its website and app users for the purpose of sending you emails regarding events, webinars, reports, newsletters, other publications, marketing materials, and



surveys. If you reside in the European Union (EU) or in any country that requires us to obtain your consent before using your Personal Data for purposes of direct marketing, we will process this information based on your opt-in consent, which you may withdraw at any time by contacting Lakou's Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org) or by writing to Data Protection Officer, Lakou NFP PO Box 6, Evanston IL, 60204.

### **Purposes and Legal Grounds:**

Personal Data that is processed when you download information from the Lakou.org website: You may sign up to download information, including reports, best practice guides, presentations.

#### Legal Grounds:

Lakou processes this information for the purpose of permitting you to download the information you have requested. Lakou may also follow up with you via email to ensure you received the information you requested, to find out if you have any questions, and to find out if you would like to receive any additional information about Lakou's Sites and Apps. The legal ground for this purpose is Lakou's legitimate interest in providing you with the information you requested and providing you with quality support.

Lakou may also process the Personal Data of its website and app users for the purpose of sending you emails regarding Lakou events, webinars, reports, newsletters, other publications, marketing materials, and surveys. If you reside in the EU or in any country that requires us to obtain your consent before using your Personal Data for purposes of direct marketing, we will process this information based on your opt-in consent, which you may withdraw at any time by contacting Lakou's Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org) or by writing to Data Protection Officer, Lakou NFP PO Box 6, Evanston IL, 60204.

#### Purposes and Legal Grounds:

Lakou may use this information for any purposes described in this Privacy Policy and for any additional purposes of which you were advised at the time the information was collected. If you do not want your Social Media information to be shared with Lakou by a Social Media provider, you should not use your Social Media accounts to access Lakou Sites and Apps. The legal basis for processing this information for these purposes is your consent, which you provide in your privacy settings to the social networking service. You may withdraw your consent by changing your privacy settings to no longer allow us access to your Social Media data.

Personal Data that is processed when clients send us information about your interactions with them: For some of our products and services, our clients may send us information about your interactions with their brands, products, and services, which may include information relating to any loyalty programs in



which you are enrolled and information about your transactions with our clients. We may combine this information with other information we have concerning you (e.g., your survey responses).

#### Purposes and Legal Grounds:

The purpose of this processing is to enhance the services we provide. The legal ground for this purpose is our clients' legitimate interests in improving and enhancing their products and services, and Lakou's legitimate interest in enhancing our products, services, and market research.

Personal Data that is automatically processed: We automatically collect the following usage data when you interact online with Lakou Sites and Apps through the use of Cookies and other data collection tools: (1) IP address; (2) domain server; (3) type of device(s) used to access the website; (4) statistics and information associated with the interaction between your browser and device, such as device model, carrier/network, battery life information, and basic usage statistics about your device; (5) real-time GPS or other geolocation data when you allow us to receive information through the location (or similar) settings on your device; and (6) referring webpage or other source through which you accessed the Lakou Site or App.

Cookies are small computer files sent or accessed from your web browser on your computer's, mobile device's, or tablet's hard drive that contain information about your computer, such as user ID, user settings, browsing history, and activities conducted while using Lakou Sites and Apps. A Cookie typically contains the domain name (internet location) from which the Cookie originated, the "lifetime" of the Cookie (i.e., when it expires), and a randomly generated unique number or identifier.

#### Purposes and Legal Grounds:

We use this usage data to facilitate communication between your device and our systems, store your preferences, authenticate users and detect and prevent fraud, enable certain functions of the website, administer and improve our website and applications, and analyze usage of and improve and enhance Lakou Sites and Apps

If you are in the EU or another country that requires obtaining your consent before processing your usage data, we process your usage data based on the consent you provide when you click the box noting that you "agree" to the processing of your Personal Data Obtained through Cookies and Other Data Collection Tools. You may withdraw your consent by contacting our Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org) or by writing to Data Protection Officer, Lakou NFP PO Box 6, Evanston IL, 60204.

Your Control of Cookies: Web browsers allow some control of most Cookies through browser settings. Some web browsers (including mobile web browsers) provide settings that allow you to reject Cookies or that alert you when a Cookie is placed on your computer, tablet, or mobile device. You may be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept Lakou's Cookies or mobile device identifiers, if you block or reject them,



you may not have access to all features available through the Lakou Site or App. You will have an opportunity to manage your Cookie preferences on our websites and/or applications; except that certain Cookies are required to enable the core functionality of such websites and applications and you cannot choose to disable those Cookies.

Personal Data that is processed when complying with legal obligations and enforcing legal rights: Lakou will process Personal Data collected through the Lakou website as needed, to comply with legal obligations and enforce legal rights.

#### Purposes and Legal Grounds:

Lakou processes such Personal Data collected through the website to enforce its rights, protect Lakou's property or protect the rights, property, or safety of others, or, as needed, to support Lakou's external auditing, compliance, and corporate governance functions. The legal ground for processing Personal Data for this purpose is Lakou's legitimate interest in enforcing its rights, protecting its property or protecting the rights, property or safety of others, or as needed to support its external auditing, compliance, and corporate governance functions.

### **Third-Party Recipients of Personal Data**

**Third-Party Service Providers Analyzing Usage of Lakou Sites and Apps:** We use Personal Data collected from cookies and other data collection tools for usage analytics, fraud detection, and performance improvement for Lakou's Sites and Apps. We may use third-party website analytics services to analyze how individuals use Lakou's Sites and Apps, including to record mouse clicks, mouse movements, scrolling activity, and text that you type into free-form boxes. We use information collected from these third-party services to help us better understand how our users find and use Lakou's Sites and Apps, enhance our services, and improve your user experience.

**Third Parties Assisting with Electronic Communications:** Your Personal Data will be used, as needed, to manage our relationship and communicate with you by mail, telephone, email, mobile alerts, and SMS text messaging. We may share your Personal Data with service providers that assist us in communicating with you.

**Third-Party Administrators of Promotions:** We may use and share your Personal Data with third parties in order to provide rewards and fulfill benefits you have requested and earned by taking surveys. If you elect to participate in a sweepstakes or other promotion, we send your information to third-party administrators of those promotions, so they can answer your questions or contact you about a prize you won or other issues related to the promotion.

**Third-Party Service Providers Assisting with Electronic Direct Marketing:** Where permissible by law, we may share your Personal Data with service providers assisting us with electronic marketing



communications. Lakou does not share the Personal Data of survey participants with direct marketing service providers, but, where permissible, we may share the Personal Data of other users of Lakou Sites and Apps with such service providers. If you are a survey participant, you should review the Privacy Policy of the client for which we are collecting your Personal Data to determine such client's direct marketing practices.

**Third-Party Service Providers Assisting with Print Mail Direct Marketing:** Where permissible, we also may share your Personal Data with direct mail service firms that assist us in printing, addressing, and distributing printed materials and other physical marketing materials. Such firms may access name, title, company, and company address information for the purpose of printing shipping and mailing labels. Lakou uses this data to reach clients and prospects with non-digital marketing and product-related communications.

**Other Service Providers:** We may share your information, including your Personal Data, with other service providers we use to perform the functions for which we engage them, such as hosting, data storage, and security. We may also share your Personal Data as needed to operate other related Lakou Sites and Apps, such as ratings and reviews websites that we operate.

**Third Parties Viewing Your Posts or Receiving Your Communications:** We may use and share your Personal Data in order to perform services you request or actions you initiate, such as when you post information on message boards, forums, or on our Social Media pages. In addition, when you give us permission, we may disclose your Personal Data in order to identify you to anyone to whom you send communications through the Lakou Sites and Apps.

**Law Enforcement and Other Public Authorities:** Lakou may also share the information we collect from you, as needed, to enforce its rights, protect its property or protect the rights, property or safety of others, or, as needed, to support Lakou's external auditing, compliance, and corporate governance functions. Lakou will disclose Personal Data as it deems necessary to respond to a subpoena, binding order of a data protection authority or judge, legal process, governmental request, or any other legal or regulatory obligation. In each case, the disclosure may be to a person or entity outside of your country of residence. Lakou may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Lakou may also share Personal Data as required to pursue available legal remedies or limit damages it may sustain.

**Third Parties in Connection with Business Reorganization:** We may transfer information about you, including Personal Data, in connection with any actual or impending reorganization, merger, sale, joint venture, assignment, transfer, acquisition, or other change in ownership or control by or of Lakou or any affiliated company (in each case whether in whole or in part), including without limitation, in connection with any bankruptcy or similar proceeding. Any such entity to which we transfer Personal Data will be required to provide you with notice of any purposes of processing not compatible with the purposes set



forth in this Privacy Policy, as well as any privacy practices that are materially different than the practices set forth in the Privacy Policy. Where required by law, such entity also will be required to obtain your consent.

## **Cross-Border Transfers of Personal Data**

Lakou controls and operates our Sites and Apps from the United States. If you are located outside of the United States, Lakou will transfer, store, and process your Personal Data in the United States. The data protection and privacy laws of the United States may not be as comprehensive as the laws in your country. For example, Personal Data transferred to the United States may be subject to lawful access requests by federal and state authorities in the United States.

Any transfers of Personal Data from the European Economic Area (“EEA”) to the United States are made pursuant to the EU-U.S. Privacy Shield. Lakou participates in and complies with the EU-U.S. Privacy Shield principles regarding the collection, use, sharing, and retention of Personal Data from the EEA. Lakou is committed to subject to the EU-U.S. Privacy Shield principles all Personal Data received from the EU in reliance on the Privacy Shield.

## **Children’s Privacy**

The Lakou website is not directed to individuals under the age of 16, and we request that individuals under 16 not provide Personal Data to Lakou. If we learn that we have collected Personal Data from a child under 16, we will take steps to delete the information as soon as possible.

## **Retention of Personal Data**

We will retain your Personal Data in our records for no longer than is necessary for the purposes for which it was originally collected. When such information is no longer needed for the purposes for which it was originally collected, we will securely delete all of your electronic Personal Data, and securely dispose of any hard copy Personal Data, except for what is needed to comply with our legal obligations. See section below under “Your Rights” for additional information pertaining to the right of erasure, as well as other data subject rights.

## **Information Security**

Lakou has an information security program that implements technical, physical, and organizational measures designed to assist in maintaining the security and confidentiality of Personal Data; safeguarding against anticipated threats to the confidentiality, integrity, and availability of Personal Data; and protecting your Personal Data against loss, misuse, unauthorized alteration or destruction, and unauthorized access or disclosure.



However, whenever Personal Data is processed, there is a risk that such data could be lost, misused, modified, hacked, breached, and/or otherwise accessed by an unauthorized third party. No system or online transmission of data is completely secure. In addition to the technical, physical, and organizational measures that Lakou has in place to protect your Personal Data, you should use appropriate security measures to protect your Personal Data. If you believe that your account or any information you provided to us is no longer secure, notify our Data Protection Officer immediately by email at [admin@lakou.org](mailto:admin@lakou.org).

## Your Rights

If you reside in the EU, you have the right under the General Data Protection Regulation to request access to and rectification or erasure of your Personal Data, data portability, restriction of processing of your Personal Data, the right to object to processing of your Personal Data, the right to withdraw your consent, and the right to lodge a complaint with a supervisory authority.

If you reside in the EU, you may opt out of usage of your Personal Data for purposes materially different than those for which your Personal Data was originally collected or subsequently authorized. You also may opt out of disclosures of your Personal Data, if any, to third-party controllers. But if you do not want your Personal Data disclosed to the client for which a survey is being conducted, you may not be eligible to participate in the survey. If we collect any sensitive Personal Data (e.g., health data) from you, we will obtain your opt-in consent before disclosing such data to a third party or using your Personal Data for a purpose other than that for which it was originally collected or subsequently authorized.

If you live in the EU, and if you wish to exercise any of these rights, contact our Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org) or by writing to Data Protection Officer, Lakou NFP PO Box 6, Evanston IL, 60204.

If you reside outside of the EU, you may have similar rights under your local laws. If you do not live in the EU but you think you have any of these data subject rights under your local laws, please contact our Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org) or by writing to Data Protection Officer, Lakou NFP PO Box 6, Evanston IL, 60204.

## Your California Privacy Rights

**Do Not Track.** Lakou does not track its customers over time and across third-party websites and online services (e.g., mobile apps), and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites and apps may track your browsing activities when they provide you content, which enables them to tailor what they present to you. Third parties may collect Personal Data relating to your online activities over time and across different websites and apps when you use our services.

LAKOU, NFP

PO Box 6, Evanston, Illinois 60204 [www.lakou.org](http://www.lakou.org)



## How to Contact Us

If you have questions about privacy, need assistance with accessing or updating your Personal Data, or have complaints relating to the processing of your Personal Data, contact our Data Protection Officer by email at [admin@lakou.org](mailto:admin@lakou.org).

You can also write to us at:

Lakou NFP PO Box 6, Evanston IL, 60204.

Attn: Data Protection Officer

## Privacy Policy Translations and Updates

This English-language Privacy Policy is Lakou's official statement of its privacy practices relating to the Lakou website and related services. In case of any inconsistency between this English-language Privacy Policy and any translation into another language, this English-language document prevails.

We will update this Privacy Policy from time to time when we make changes impacting the Privacy Policy, such as adding new services and applications, improving our services, and addressing changes in technologies and laws. The Effective Date of this Privacy Policy, which is set forth on the first page of the Privacy Policy, reflects the date the Privacy Policy was last updated. Lakou will provide notice to you if these changes are material, and where required by applicable law, we will obtain your consent. This notice will be provided by posting notice of the changes on the website.