

# WeVoyce™ Privacy Policy

WeVoyce, Inc. ("us", "we", "our" or equivalently WeVoyce) operates the WeVoyce mobile application. Your privacy is important to us. It our policy to respect your privacy regarding any information we may collect from you across our platform and sites we own and operate. WeVoyce believes you should be informed of what data is collected in using our services and how we use it to provide you with the ability to make well informed decisions in the information you will share with WeVoyce. Please read this Privacy Policy.

## 1. Information we collect

- ***Log Data***

WeVoyce uses your contact information and other personal information provided to the platform to authenticate your account and to keep your account and the service secure and free of harm and abuse. WeVoyce also uses contact information to personalize the services and enable applicable account settings and features based on the category of each membership.

- ***Device Data***

WeVoyce may also collect data about the device you're using to access our Services. This data may include the device type, operating system, unique device identifiers, device settings, and geo-location data. What we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us.

- ***Personal Information***

WeVoyce requires your information to be able to provide you with the services. We may collect personal information, such as your:

- Name
- Date of birth
- Phone/mobile number
- Home/Mailing address
- Political party affiliation
- Citizenship
- Country of residence
- Voter eligibility

WeVoyce requires voter registration verification to vote on WeVoyce and to do so government agencies require Identification or Drivers' License information as well as the last 4 digits of social security, which will be temporarily retained and then permanently discarded once the verification is completed.

WeVoyce allows you to retain and edit your eligibility to donate to candidates directly or indirectly via propositions and advocates. WeVoyce therefore retains your eligibility information, similar to other political donation venues, which includes the following:

- If you are a US citizen or lawfully admitted permanent resident.
- That you are not a Federal Contractor. Federal Contractors are considered any individuals or employers who enter into a contract with the United States (any department or agency) to perform a specific job, supply labor and materials, or for the sale of products and services.
- That you are 18 or older.
- That you are donating using your own funds.
- Employment information, including occupation and employer – or if unemployed.

- ***User Content***

WeVoyce keeps Contents provided by all its users under the Services in perpetuity. By using WeVoyce Services you acknowledge that you do not have the right to delete or edit Content you provide on WeVoyce platform.

- ***Payment Information***

WeVoyce users are able to donate to support causes, candidates and initiatives. As WeVoyce users you may provide the Services with payment information to support causes, candidates and initiatives available on WeVoyce platform.

- ***Aggregate Data***

WeVoyce may collect anonymous demographic information, which is not unique to you, such as your Postal Code, age, gender, political affiliations, preferences, interests and favorites. For avoidance of doubt any such data is in aggregate form and cannot be connected or linked to a specific user.

## **2. Third Party Sites**

2.1 WeVoyce uses third party secure payment systems and in doing so provides the information on pass-through basis to process payment which is subject to their terms & conditions as well as privacy policies. WeVoyce does not retain any payment information. WeVoyce uses third party secure payment systems and will facilitate the transfer of your name, address, credit card details, and transaction amount as necessary for the third party to provide such service. Any credit card information is collected by our PCI-compliant third-party payment processor (via web-portals they maintain and control) and are transmitted over a secure encrypted connection and stored in a datacenter until the transaction is completed, at which point it is removed unless you have requested to store your credit card details securely with the credit card processor for future transactions. To the extent your personal information is transmitted to the third-party payment processor, their own privacy policies and data security policies will also apply to such personal information

2.2 WeVoyce Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

WeVoyce requires candidates who declare their candidacy on WeVoyce to supply us the following information which will be retained as long as your candidacy is active.

- Campaign Committee EIN as provided by the US Treasury
- Your bank routing and account number for funds transfer

### **3. Legal bases for processing**

We will process your personal information lawfully, fairly and in a transparent manner to deliver our services. We collect and process information about you only where we have legal bases for doing so. Meaning we collect and use your information only where:

- it's necessary for the performance of WeVoyce services (for example, when we ask your political party affiliation to provide you with membership status);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development of WeVoyce services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our e-mails); or
- we need to process your data to comply with a legal obligation.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

We don't keep personal information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

### **4. Collection and use of information**

We may collect, hold, use and disclose information for the following purposes and personal information will not be further processed in a manner that is incompatible with these purposes:

- to enable you to customise or personalise your experience of our Service;
- to enable you to access and use our Service and associated applications
- to contact and communicate with you;
- for internal record keeping and administrative purposes;

- for analytics, market research and business development, including to operate and improve our services and associated applications
- to comply with our legal obligations and resolve any disputes that we may have.

## 5. Disclosure of personal information to third parties

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, hosting and server providers, analytics, error loggers, debt collectors, maintenance or problem-solving providers professional advisors and payment systems operators;
- our employees, contractors and/or related entities where necessary to perform their services;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who collect and process data and assist us in providing information and products.

## 6. Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights.

WeVoyce, Inc. aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where WeVoyce, Inc. relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## 7. Your rights and controlling your personal information

**Choice and consent:** By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this privacy policy. If you are under 16 years of age, you must have, and warrant to the extent permitted by law to us, that you have your parent or legal guardian's permission to access and use the service and they (your parents or guardian) have consented to you providing us with your

personal information. You do not have to provide personal information to us, however, if you do not, it may affect your use of this service, platform or the products offered on or through it.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

## **8. How you can control your personal information with us**

You control the personal data you share with us. You can access or rectify this data at any time. You can also deactivate your user account. We also provide you tools to object, restrict, or withdraw consent as described in the Guidelines and Terms of Service.

### 7.1 Accessing or correcting your personal data

If you have registered an account on WeVoyce, we provide you with tools and account settings to access, correct, delete, or modify the personal data you provided to us and associated with your user account.

### 7.2 Deletion

We keep log of user data for a maximum of 30 days after termination of a user account. Your account will be deactivated and then deleted upon termination. When deactivated, your WeVoyce account, including your display name, username, and public profile, will no longer be viewable on the platform. For up to 30 days after deactivation it is still possible to restore your WeVoyce user account if it was accidentally or wrongfully deactivated.

Notwithstanding the preceding, search engines and other third parties may still retain copies of your public information, like your profile information and public posts even after you have deleted the information from our services or deactivated your account.

WeVoyce provides you a means to download the information you have shared through our services by following provided instructions.

7.3 Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA). We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

WeVoyce will not retain, use or disclose any of your data used in the Service , other than for a business purpose under the CCPA and the specific purpose of performing Services, or as otherwise permitted under the CCPA. It is agreed that WeVoyce User's transfer of their data to WeVoyce is not a sale and WeVoyce is prohibited from retaining, using, or disclosing the personal information for any purpose other

than for the specific purpose of performing the Services specified in the Terms of Service.

## **9. Breach and Notices**

**Notification of data breaches:** We will comply with laws applicable to us in respect of any data breach.

**Complaints:** If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contract a regulatory body or data protection authority in relation to your complaint.

## **10. Cookies**

WeVoyce uses cookies to implement features and improve the quality of the service. Websites you visit through WeVoyce may use cookies in accordance with their policies. WeVoyce cannot be responsible for third party website practices.

## **11. Business transfers**

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your personal information according to this policy.

## **12. Limits of our policy**

Our Service may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

## **13. Changes to this policy**

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our application. Your continued use of service after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information. If we make a significant change to this privacy policy, for example changing a lawful basis on which we process your personal information, we will ask you to re-consent to the amended privacy policy.

## **14. Unsubscribe**

To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

## **15. Additional information or assistance**

Please let us know by contacting us here or if you require further information or assistance by email: [privacy@wevoyce.com](mailto:privacy@wevoyce.com)

This policy is effective as of March 15, 2020.