

Ameelio Privacy Policy

Effective as of September 15, 2020

This “Privacy Policy” describes the privacy practices of Ameelio, Inc. (collectively “**Ameelio**,” “**we**,” “**us**” or “**our**”) in connection with the ameelio.org website (“**Site**”), the Ameelio mobile application (“**App**”) and any other website that we own or control and which posts or links to this Privacy Policy (collectively, the “**Service**”), and the rights and choices available to individuals with respect to their information.

Personal Information We Collect

Information you give us. Personal information that you may provide through the Service or otherwise includes:

- **Contact information**, such as your first name, last name, postal address, and email address, as well as the first name, last name, inmate identification number, and precise mailing address of the individual you are writing to;
- **Profile information**, such as your username, password and preferences;
- **Content you choose to upload to the Service**, such as letter content and images, along with the metadata associated with the files you upload (e.g., timestamps);
- **Communications**, such as information you provide when you participate in telephone conferences with our representatives (which may be recorded with your permission where permitted by law); report a problem with Service, receive customer support or otherwise communicate with us;
- **Geolocation information**, such as when you authorize our App to access your location;
- **Marketing information**, such your preferences for receiving marketing communications about our Services and products; details about how you engage with our communications; information you provide when you participate in a contest or promotion; and
- **Other information** that you choose to provide but is not specifically listed herein, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Information from third party sources. We may receive personal information from third-party sources such as the Department of Corrections and various prisons and jails. For example, the Department of Corrections may share names of incarcerated persons, dates of incarceration, expected release dates, identification numbers, names of housing facilities and calendar availability (if applicable). We may also obtain your personal information from other third parties, such as marketing partners, data providers and other publicly accessible sources.

Data collected automatically. We, our service providers, and our business partners may automatically log the following information about you, your computer or mobile device, and your activity over time on the Service and other online services:

- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, unique identifiers, and general location information such as city or town.
- **Usage data**, such as the website you visited before browsing to the Site, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Some of our automatic collection is facilitated by:

- **Cookies**, which are text files stored on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently and remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- **Javascript libraries**, which are snippets of code within web pages that execute when certain actions take place.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content within it was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.

Changes to your personal information. It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by updating your registration profile or emailing us at team@ameelio.org.

How We Use Your Personal Information

We use your personal information for the following purposes or as otherwise described to you at the time of collection:

Service delivery. We use your personal information to:

- provide, operate, maintain, and improve the Service;
- communicate with you regarding the Service, including by sending you Service announcements, technical notices, updates, security alerts, and support and administrative messages;
- process any orders or donations and process any related payments;
- understand your needs and interests, and personalize your experience with the Service; and
- provide support for the Service and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and develop other products and services. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing. We and our third party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** If you request information from us, use the Service or participate in our surveys, promotions or events, we may send you Ameelio-related marketing communications as permitted by law but will provide you with the ability to opt out.
- **Interest-based advertising.** We may contract with third-party advertising and social media companies to display ads on our Service and other sites. These companies may use cookies and similar technologies to collect information about you (including the device data and online activity data described above) over time across our Service and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. These ads are known as "interest-based advertisements." You can learn more about your choices for limiting interest-based advertising, in the "Advertising choices" section below.

Compliance and protection. We may use your personal information to:

- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce our Terms of Use;
- protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft; and
- comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

Other purposes with your consent. In some cases we will ask for your consent to collect, use or share your personal information for other purposes. For example, we may ask for your consent to send you marketing emails where required by law or to post your testimonial or endorsement.

How We Share Your Personal Information

We do not share the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

- **Affiliates.** We may disclose your personal information to our subsidiaries and corporate affiliates for use consistent with this Privacy Policy.
- **Business transfers.** We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.
- **Service providers.** We may employ companies and individuals to help provide the Service on our behalf or help us operate our business (such as printing and mailing logistics, IT, customer support, hosting, website analytics, email delivery, marketing and advertising, research, event management). They are permitted to use your personal information only as authorized to perform these tasks in a manner consistent with this Privacy Policy.
 - In particular, we may use a third-party direct mail platform to send your letters. Currently, we use Lob— Lob's privacy policy is available at <https://www.lob.com/privacy>.
- **Business partners.** We may share your personal information with our business partners who offer a service to you jointly with us, for example, when running a co-sponsored contest or promotion.
- **Advertising partners.** We may work with third party advertising companies that collect information about your activity on the Site and other online services to help us advertise our services (including, through interest-based advertising), and/or use hashed customer lists that we share with them to deliver ads to them and similar users on their platforms.
- **Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services they render to us.

- **Compliance and protection.** We may disclose your personal information as we believe appropriate to government or law enforcement officials or private parties (a) for the compliance and protection purposes described above; (b) as required by law, lawful requests or legal process, such as to respond to subpoenas or requests from government authorities; (c) where permitted by law in connection with any legal investigation; and (d) to prosecute or defend legal claims.

Your Choices

Access or update your information. You may review, update, correct or delete the personal information in your registration profile by logging into your account or emailing us at team@ameelio.org.

Marketing communications. You may opt out of marketing-related emails by logging in and changing your account settings or by following the opt-out prompt in the email. You may continue to receive Service-related and other non-marketing emails.

Cookies. Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Service and our Site may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

Advertising choices. You can limit use of your information for interest-based advertising by:

- **Browser settings.** Blocking third party cookies in your browser settings using or ad-blocking browser plug-ins/extensions.
- **Mobile device settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- **Platform settings.** Using Google's and Facebook's interest-based advertising opt-out features:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies participating in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - European Interactive Digital Advertising Alliance (for European users): <http://www.youronlinechoices.eu/>
 - Digital Advertising Alliance:
 - optout.aboutads.info, which lets you opt-out of interest-based ads on websites.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which lets you opt-out of interest-based ads in mobile apps.

The opt-out preferences described above must be set on each device for which you want them to apply. Not all companies that serve interest-based ads participate in the ad industry opt-out programs described above, so even after opting-out, you may still receive some cookies and interest-based ads from other companies. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you.

Privacy settings and location data. Users of our App have the choice whether to allow us to access your precise location data. Your device settings may provide the ability for you to revoke our ability to access location data.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide your personal information. If you do not provide information indicated as required or mandatory within the Service, or that is otherwise necessary to provide a requested service or feature within the Service, that portion or all of the Service may be unavailable to you and we may deactivate your account.

Security

The security of your personal information is important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. However, no security safeguards are 100% secure and we cannot guarantee the security of your information.

International Data Transfers

Ameelio is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country.

Third Party Sites and Services

The Service may contain links to other websites and services operated by third parties, such as social media platforms, advertising services and other websites and applications. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and disclosure of your personal information. We encourage you to read their privacy policies to learn more.

Children

The Service is not directed at, and Ameelio does not knowingly acquire or receive personal information from, children under the age of 13. If we learn that any user of the Service is under the age of 13, we will take appropriate steps to delete that individual's personal information and restrict that individual from future access to the Service.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy we will notify you by email (if you have an account linked to a valid email address) or another manner through the Service that we believe is reasonably likely to reach you.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes in the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any updated Privacy Policy indicates your acceptance of the update.

Contact Us

If you have any questions or concerns about our Privacy Policy, please contact us.

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