Ameelio Privacy Policy March 23, 2020

Effective Date: March 23, 2020

1. Introduction. Ameelio, Inc.'s ("Ameelio", "Company", "we", "our", and "us") mission is to improve the lives of those impacted by incarceration and provide a communication service that connects individuals who are incarcerated with the free world. Ameelio is committed to being transparent about how Ameelio uses information collected through Connect, Letters, Forum, and other related services (the "Services").

This privacy policy (the "Policy") applies to our privacy practices for the handling of data submitted in connection with your use of our Services. This Policy describes the types of information we collect, how we may use or process that information, and with whom we can share it. This Policy also describes measures we take to protect the security of your personal information.

2. Information Collected.

Information You Provide Us. When you use the Services, you will have an opportunity to provide us some information directly. For example, we may collect information when you register an account with us. Upon registration, we may ask you to provide information including your name, email address, and mailing address. We may also collect information from you in a completion survey or other communications with Ameelio.

Information We Automatically Collect. When you interact with the Services, we automatically collect some information from you. For example, Connect records and saves all calls made through the video call service. Data collected from the calls may include audio/video and biometric data (such as your voice). Similarly, when you use Letters, we may save the contents of the message. Additional information about your usage of Ameelio's services may also be collected through a third party provider. This may include, but is not limited to, your IP address, phone number, and information about the pages you visit and the features you use.

Information Provided by Third Parties. In addition, we may collect information through other sources. For example, we may receive information from the Department of Corrections and various prisons and jails. This information may include information such as incarcerated persons' names, date of incarceration, expected release date, identification number, housing facility name, demographic information, and sometimes calendar availability.

- **3.** Use of Collected Information. We use information that we collect from and about you in order to:
 - Present our website and its contents to you.
 - Personalize your experience, respond to your specific requests, and notify you about changes to our Website or any Services we provide.
 - Conduct research on the impact of our Services.

- Comply with requests to lawfully collect information, including meeting contractual obligations with prison authorities.
- In any other way we may describe when you provide the information and for any other purpose with your consent.

4. Information We Disclose.

Ameelio may disclose aggregated or de-identified information about our users without restriction. We may collect, use, and share this information for research purposes including, but not limited to, research on recidivism rates.

Information you provide may also be shared with third parties in order to carry out our services. For example, if you type and submit a letter, we will work with our third party provider to print and send the letter. For more information about our services, please see the Terms of Service here.

Please note that if you submit any of your personally identifiable information to a portion of Ameelio's Services that is accessible by other users, including in an online forum, the public and other users will be able to see that information. Only include information in such submissions you are comfortable sharing with third parties or the general public.

In order to provide our Services, we also may coordinate with and disclose information to state and federal prisons. We reserve the right to access, read, preserve, and disclose any information we believe is necessary to comply with lawful requests or enforce or apply our Terms of Service here and other agreements. We also reserve the right to access or disclose any information to protect the rights, property, or safety of Ameelio, our employees, our Users, or others.

5. Data Security. We take care to implement reasonable measures designed to protect your personal information. The safety and security of your information also depends on you. Certain parts of our Services are protected by a password, and it is your responsibility to keep that password confidential.

We endeavor to protect the privacy of your account and other personal information we hold in our records. However, no transmission of information via the internet is completely secure, and we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. We assume no responsibility or liability if any information relating to you is intercepted or used by an unintended recipient.

6. **Modification and Retention of Information**. You may access your name and account information through your account settings. The information you can view, update, and delete may change over time. Identifiable information provided to Ameelio will be kept as long as reasonably necessary for the legitimate business purposes, or as required by law (for example legal or accounting purposes), whichever is longer.

Information that has been de-identified or is not personal information may be retained indefinitely and used for research or other purposes.

- 7. Age of Users. If you are younger than 13, you may not use, access, or provide any content using our Services. If your age is 13 or older but under the age of 18, you may use our Services only under the supervision of a parent or legal guardian who agrees to be bound by the Terms of Service [LINK] and this Privacy Policy. If you are a parent or legal guardian agreeing to the Terms of Service of this Policy for the benefit of a child who is 13 or older but under the age of 18, you are fully responsible for the child's use of the Services.
- **8.** California Privacy Rights. If you are a resident of California, California law may provide you additional rights to the use of your personal information. To learn more about your California privacy rights, visit the California Attorney General website here. Please contact us at team@ameelio.org for more information.
- **9. Changes to the Policy**. We will post any changes we make to our Policy on this page. If we make material changes to how we treat User's Personal Information, we will notify you through a notice on the Ameelio website homepage. The date the privacy policy was last revised is identified at the beginning of the Policy.
- **10. Contact Information**. For any questions about this Policy or our privacy practices, contact us at: team@ameelio.org.