

# Asbury Hills & South Carolina Camps & Retreat Ministries Bunk1 Privacy Policy

Bunk1 and its affiliates and subsidiaries "**we**," "**us**" or "**our**") recognizes the importance of protecting the privacy of our online visitors. The following privacy policy ("**Privacy Policy**") describes the way we handle information learned about you from your visits to our website and any services that we and/or our affiliate companies offer to customers or users of our services (collectively, "**Services**").

**PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY.** By accessing the Site and/or submitting information to or through the Site, you accept the terms of this Privacy Policy and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy.

#### **Biometric Data Privacy**

We offer a feature that uses a third party service to run a facial geometry recognition program on photographs that are uploaded to our product, the results of which assist parents in identifying their campers in the photographs and help to notify parents when photographs of their campers are uploaded. By uploading a profile photo of your child to begin the process and by tagging photos from camp in connection with these features, you are sharing information that identifies your child in the uploaded profile photos or self-tagged camp photos that will be used algorithmically to identify the child in other camp photos. The scan of face geometry is considered "biometric data" under various state statutes and regulations. For our notice concerning the collection, use and retention of biometric data, please see the section below entitled, "Biometric Data." By being presented with this Privacy Policy and agreeing to its terms, you are authorizing Bunk1 to disclose and transmit PII biometric data to its third-party vendors for purposes of using Bunk1's products and services.

#### **Personal Information**

Bunk1 collects personally identifiable information from you, which may include:

- Registration and Account Information. When you register an account, we may
  collect certain PII such as your first name, last name, email address, and
  telephone number. If you share with us the PII of others, such as your child, other
  parent or guardian, or other relatives, you are representing that you are
  authorized to provide us with their information and that we may treat it in
  accordance with this Privacy Policy.
- Bunk1 Notes. We offer features that allow you to send letters to your camper using our Services. If you choose to use these features, we may use your email address to copy you on the message or to send the letter on your behalf, and you hereby grant permission for such use.
- Photographs. We may ask you to provide photographs of yourself, your child, or others as part of your use of the Services. Photographs may be taken by you, us, or another third party. Depending on your use of the Services and types of features on the Services that your use, we may collect, capture, store, use, or obtain PII or biometric data, or cause others to do so, from the photographs submitted in connection with the services.
- Facial Geometry Recognition Software. We offer a feature whereby a parent uploads a photo and then we have a third party (AWS or its affiliates) run a facial geometry recognition program on the photo, the results of which assist parents in identifying campers in photos available through the Services and notifies parents when photos of their children are uploaded. By uploading a profile photo of your child to begin the process and by tagging photos from camp in connection with

these features, you are sharing information that identifies your child in the uploaded profile photos or self-tagged camp photos and that will be used algorithmically to identify the child in other camp photos. We do not collect, process, or store, nor do we have any control over, any facial recognition biometric data. To view the privacy policy of the third party which runs the facial recognition program, please see here.

- Customer Services. When you contact us through any of our customer support channels, including email, web portals, and telephone support numbers, we collect PII to track and respond to your inquiry and analyze and improve our Services.
- Payment Information. If you choose to purchase any goods, services, or premium functionality through our Services, you may need to provide your payment information and other PII, such as your name, postal address, email address, and telephone number.
- Online surveys. From time to time, we may conduct surveys to collect information about user preferences. These are optional, and if you choose to respond, your responses will be treated in accordance with the survey terms, if any, as well as this Privacy Policy and any other applicable policies or terms. These surveys may be conducted by and processed through third parties.

#### **Information Collected from Third Parties**

We also maintain a presence on several social networking and blogging platforms, such as Facebook, Instagram, Snapchat and Twitter. We may incorporate some third-party social networking features into our Services or utilize third-party provided platforms to publish or manage the Services or portions thereof. Through these platforms and features, we receive some PII about you, and this Privacy Policy applies to our collection of that information. In addition, some providers of third-party social networking platforms we utilize have their own privacy policies which explain how the third parties that provide them may collect, use and protect your information on their platforms.

# Information Collected Automatically

Information about your computer hardware and software may automatically be collected by Bunk1 using data collection and tracking tools when you use the Service. This information may include:

- IP address
- Browser type
- Type of operating system
- Device type
- Unique device identifier
- Internet service provider
- Language preference
- Access times and dates
- Geographic location
- Referring website addresses
- Browsing history
- Search queries
- Other technical information such as protocol status and substatus, bytes sent and received, and server information.

This information is used by us for our business purposes, including without limitation for the operation and improvement of the Service, for technical troubleshooting, to maintain quality of the Service and to provide general statistics regarding use of the Service.

Examples of the types of tracking technologies deployed on the Services include the following:

 "Cookies" are small data files stored on your computer or device to collect information about your use of the Services. In addition to the general purposes listed above, cookies may enable us to recognize you as the same user who was at our website in the past, and relate your use of our website to other information we have about you. Cookies may also be used to enhance your experience on our website (for example, by storing your username) and/or to collect general usage and aggregated statistical information. Most browsers can be set to detect cookies and give you an opportunity to reject them, but refusing cookies may, in some cases, limit your use of our website or its features.

- "Local shared objects," or "flash cookies," may be stored on your computer or device using a media player or other software installed on your computer or device. Local shared objects operate much like cookies, but cannot be managed in the same way. Depending on how local shared objects are enabled on your computer or device, you may be able to manage them using software settings.
- A "pixel tag" (also known as a "clear GIF" or "web beacon") is a tiny image typically just one-pixel – that can be placed on a web page or in our electronic communications to you in order to help us measure the effectiveness of our content by, for example, counting the number of individuals who visit us online or verifying whether you've opened one of our emails or seen one of our web pages.
- "HTML5" (the language some websites, such as mobile websites, are coded in) may be used to store information on your computer or device about your usage of the Services so that we may improve and customize them for you.

For example, we use Google Analytics to help analyze how users use the Service. These tools use cookies to collect standard Internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Service (including IP address) is transmitted to our data collection tool service providers. This information is then used by us to evaluate visitors' use of the Service and to compile statistical reports on website activity for Bunk1. If you would like to opt-out from the use of your information by Google analytics, you may use Google Analytics opt-out browser add-on designed for this purpose.

### How Information is Used

We may use the information we collect for any of the following purposes:

- to provide the Service to you and to improve the Service;
- to provide, operate, improve, and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- to register your account;
- to determine trends in consumption of our products and determine where our products may be in demand;
- to provide you with information about products and services that we may provide that we think may be of interest to you;
- to provide you with updates about our products and services and with transactional information;
- for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Service;
- for analytics purposes;
- to fulfil your requests, such as those related to ordering and payment;
- to communicate with you;
- to enforce our Privacy Policy or other applicable policies;
- to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process;
- to enforce our rights, protect our property or protect the rights, property or safety of others;
- as needed to support external auditing, compliance and corporate governance functions.

### Sharing of Information

- With Third Party Service Providers Performing Services on Our Behalf. We may share your personal information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Service or assist us in providing functionality on the Service, provide analytics on the Service, to send out emails on our behalf or process payments.
- With Our Affiliates and Subsidiaries. We may share your information with our family of brands and corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures or companies under common control) for our internal business purposes. However, if we do so, their use and disclosure of your personal information will be subject to this Privacy Policy.
- For Legal Purposes. We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share personal information as required to pursue available remedies or limit damages we may sustain.
- Changes of Control. We reserve the right to transfer or assign the information that we have collected from users in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Bunk1 does not share your personal information with third parties for those third parties' direct marketing purposes.

#### **Biometric Data**

When our customers use our products to post photographs of their campers, the photographs are scanned by a third-party facial geometry recognition software to assist parents in identifying their campers in the photographs and to notify parents when photographs of their campers are uploaded.

Parents upload a profile photograph of their camper on our products and can tag photographs our customers post to use such feature. We collect this information and disclose this information to our third-party service provider, Amazon Web Services ("AWS"), to algorithmically identify the camper in other photographs our customers post and to improve the reliability of the facial geometry recognition software. We do not collect, process, or store, nor do we have any control over, any facial recognition biometric data. To view the privacy policy of AWS, please click here. We may also disclose this information with our customers to operate our products, such as the photo galleries from camp and to administer push and SMS notifications. We do not use the profile photographs of campers or the tags on the photographs for any purpose other than the operation of the facial recognition software in the context of providing our products.

We also do not share your biometric data with third parties for their marketing or advertising purposes, however we cannot and do not control how other third parties use biometric data that is disclosed to them in accordance with this Privacy Policy. Bunk1 does not trade, sell, lease, or profit from biometric data solely for the purpose of disclosing, transmitting, or sharing biometric data in exchange for value so that third parties can use it for marketing or advertising purposes. If we intended any such usage that might be considered third-party marketing (for example, that might be associated with a sponsored promotion like a contest or sweepstakes), we would notify you and seek your consent to use biometric data for that purpose.

The profile photographs of campers that parents may upload are deleted at the end of each calendar year. Our system works best when parents upload new photographs of their campers at the start of each camp year for the software to have a recent photograph to work with. Once parents tag a camp photograph, tag information is retained with the photograph indefinitely unless parents un-tag it. We retain biometric data for as long as necessary to fulfill the purpose for which it was collected, but in no event will we retain biometric data for longer than three (3) years from the date on which our customers' constituents terminate their account membership.

#### Your Rights and Choices

You may opt out of receiving promotional e-mails from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to billing and payment information or changes to this Privacy Policy). If you have registered for an account with us, you may delete the account at any time by contacting us at legal@togetherwork.com.

You may access or modify some of your information and/or modify your preferences through your account or by contacting us at legal@togetherwork.com.

#### Links to External Websites / Online Services

Our Service may contain links to third-party websites and/or online services. Any access to and use of such third-party websites and/or online services is not governed by this Privacy Policy, but is instead governed by the privacy policies of those third parties, and we are not responsible for the information practices of such third-party websites and/or online services.

Some aspects of the Service may allow you to interface with social media, such as Facebook or Google Plus. We will attempt to identify these aspects of the Service to you, for example, by identifying them with the applicable third-party logos or trade names. By using these interfaces, you will allow us to access information about you from those other online services, including information and other content that you submit to those online services. If you interface with the Service through your social media account, we may contact you or enable you to share your experience and content via your social media account, which information may be publicly viewed by other users of those services. For a description on how such social media services and other third-party platforms, plug-ins, integrations, and applications handle your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings with that service or platform.

#### Security Used & Retention of Personal Information

Bunk1 uses reasonable security measures designed to prevent unauthorized intrusion to the Service and the alteration, acquisition or misuse of personal information, including biometric data. However, the security of information transmitted through the Internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our Service. In order to protect us, you and your data, we may suspend your use of the Service, without notice if any breach of security is suspected. Access to and use of password protected and/or secure areas of the Service are restricted to authorized users only. Unauthorized access to such areas is prohibited.

We will retain your personal information for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation.

#### **Do Not Track**

Our Service does not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit www.donottrack.us.

### Children

We do not knowingly collect or maintain personal information from any person under the age of eighteen. No parts of our Site are directed to or designed to attract anyone under the age of eighteen.

# Contact Information: Questions and Changes in Information

If you have any questions regarding this Privacy Policy or to request changes to your personal information, please contact us at legal@togetherwork.com.

# Notification of Changes

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.