DRESS FOR SUCCESS WORLDWIDE PRIVACY POLICY June 7, 2016

At Dress for Success Worldwide. ("<u>Dress for Success</u>," "<u>we</u>," "<u>us</u>," or "<u>our</u>"), our fundamental philosophy is "site visitors first." That value powers all of the decisions we make, including how we gather and respect your personal information. We've crafted this privacy policy (this "<u>Privacy Policy</u>") to be as clear and straightforward as possible because we know that you care about how information you provide to us is used and shared. Our aim is for you - a valued user of our site - to always feel informed and empowered with respect to your privacy on Dress for Success.

This Privacy Policy applies to all information received by Dress for Success, both online and offline, on any Platform, ("Platform", includes the Dress for Success Worldwide website, mobile applications, and social media), as well as any electronic, written, or oral communications.

<u>Acceptance of Terms</u>

By visiting Dress for Success and/or using our Services, you agree to the terms of this Privacy Policy.

The Information We Collect

Dress for Success Worldwide collects the following types of information, both directly from you and indirectly through the collection of information by third-party service providers and advertising partners (together, "Partners").

1. Personal Information

For purposes of this Privacy Policy, "Personal Information" means any information or set of information that identifies or could be used by or on behalf of Dress for Success Worldwide, or any of our Partners to identify a natural person. Personal Information does not include information regarding corporate entities or information that is encoded, aggregated, anonymized, or publicly available information that has not been combined with non-public Personal Information.

Examples of different purposes for which we may collect Personal Information include but are not limited to:

- The registration process for Registered Users;
- Clients who access Dress for Success Worldwide services;
- Job applications; and
- Voluntary submissions to Dress for Success Worldwide requesting information about our services, signing up to receive information from us or become a volunteer or sending us an e-mail.

2. Non-Personal/Other Information

In addition to the Personal Information, we may collect additional information that does not personally identify you (collectively, "Other Information"). Other Information may include information collected:

- a. <u>From Your Activity</u>. Information that we may automatically collect when you visit, access and/or use the Platform, including but not limited to your IP address, Internet service provider, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, which sections of the you visit, number of links you click while on the Platform, search terms, operating system, and technical information about your mobile device.
- b. From Cookies, JavaScript Tags. Information that we automatically collect using technical methods, including but not limited to "cookies," JavaScript tags, web beacons, pixel gifs, Flash cookies, and other locally stored objects. Cookies are small packets of data that a website stores on your computer's hard drive so that your computer will "remember" information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to enhance your experience using Dress for Success Worldwide and to allow us to collect Other Information. You may be able to disable cookies and/or other locally stored cookies by disabling them in your browser or on your device. Please consult your Internet browser's documentation for

information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, Dress for Success Worldwide may not function properly. We use JavaScript tags to trigger a sequence of events that includes viewing a first-party cookie (or setting that cookie if it does not already exist) and to help us tailor and optimize Dress for Success Worldwide.

c. <u>Do Not Track ("DNT")</u>. Dress for Success Worldwide assumes no responsibility for responding to "Do Not Track" web browser signals. Consult external website polices regarding their responses to DNT signals.

Advertising Partners

Dress for Success Worldwide has entered into agreements with certain Partners to deliver relevant, user-target, non-intrusive advertising to help fund the cost of maintain Dress for Success Worldwide's operations. These Partners do not have access to any Personal Information and only access Other Information. These Partners have their own policies that should be reviewed in connection with your use of Dress for Success Worldwide. Partners include, but are not limited to:

Google Analytics. Dress for Success Worldwide uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies," which are text files placed on your computer, to help the website analyze how users use the site. The Other Information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page.

How We Use and Share the Information

We use the Personal Information and the Other Information to provide you the Services, process your donations, solicit your feedback, inform you about our services and assess the effectiveness of a campaign. We may also use and/or share the Personal Information, the Other Information, and the User Content as described below:

- We may employ other companies and individuals to perform functions on our behalf such
 as technical assistance. These other companies will have access to the Personal
 Information and the Other Information only as necessary to perform their functions and to
 the extent permitted by law.
- In an ongoing effort to better understand visitors to our site and services, we may analyze the Other Information in aggregate form in order to operate, maintain, manage, and improve our services. This aggregate information does not identify individuals personally. We may share this aggregate data with our business partners. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners and to other third parties for other lawful purposes.
- To the extent permitted by law, we may also disclose the Personal Information and the
 Other Information: (i) when required by law, court order, or other government or law
 enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing
 such information is necessary or advisable, for example, to protect the rights, property, or
 safety of Dress for Success Worldwide or others.

<u>Accessing and Modifying Information and Communication Preferences</u>

Upon request, Dress for Success Worldwide will grant individuals reasonable access to Personal Information that we and our agents hold about them. For example, visitors to the Platform who have provided Personal Information to us may review and/or make changes to the same by contacting Dress for Success Worldwide. In addition, individuals may manage

their receipt of marketing communications by clicking on the "unsubscribe" link located on the bottom of any Dress for Success Worldwide marketing e-mail or by following the instructions found on the Platform. We will use commercially reasonable efforts to process such requests in a timely manner.

How We Protect the Information

We take commercially reasonable steps to protect the Personal Information and Other Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Platform may not be secure and you should therefore take special care in deciding what information you send to us via e-mail.

All website user accounts are password protected; only users have access to their individual passwords. Our email, database, and website are SSL encrypted. Access to client and donor data is restricted to Dress for Success employees who use the information solely for work purposes and who are subject to strict contractual confidentiality obligations; failure to meet those obligations will result in discipline or termination.

Important Notices to Non-U.S. Residents

It is important to note that the Platform and our servers are operated in the United States. If you are located outside of the United States, please be aware that any Personal Information you provide to us will be transferred to the United States. By using the Platform and by providing us Personal Information in any manner, you consent to this transfer and our use of the information and data provided by you in accordance with this Privacy Policy. If you have any questions regarding this Privacy Policy, please contact us as described in the "How to Contact Us" section below. We will investigate your question, respond to your inquiry, and attempt to resolve any concerns regarding your privacy question.

External Websites

The Platform may contain links to third-party websites. Dress for Success Worldwide has no control over the privacy practices or the content of those websites and is therefore not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

Children

We do not knowingly collect Personal Information from children under the age of 13 through the Services. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

California Residents

Dress for Success Worldwide's policy not to disclose any personal information we collect to third parties for direct marketing purposes under any circumstances. However, California Civil Code Section 1798.83 requires that all California residents be afforded the option to exercise your choice of whether your personal information may be shared with third parties for direct marketing purposes or not, as well as to receive information specified in the statute if your personal information is disclosed to third parties for direct marketing purposes. Accordingly, if you are a California resident and you wish to inform Dress for Success Worldwide whether you permit or refuse the sharing of your personal information with third parties for direct marketing purposes, or if you wish to request certain information if your personal information were to be disclosed to third parties for direct marketing purposes, please contact us as described in the "How to Contact Us" section below.

Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Please be aware that, to the extent permitted by applicable law, our use of the Personal Information and Other Information is governed by the Privacy Policy in effect at the time we collect the information. Please refer back to this Privacy Policy on a regular basis.

How to Contact Us

If you have questions about this Privacy Policy, please contact Dress for Success Worldwide via:

- e-mail at worldwide@dressforsuccess.org with "PRIVACY POLICY" in the subject line; or
- postal mail to: Dress for Success Worldwide, 32 East 31st Street, Floor 7, New York, NY 10016.