

## The Basics Privacy Policy

This Privacy Policy (the "**Privacy Policy**") applies to our website at [www.thebasics.org] (the "**Website**" or the "**Site**"), the services and information available via the Platform (collectively, the "**Services**") and any mobile applications we may provide for your use in connection with our Services, including our text messaging application ("**Applications**") (the Services, together with our Website and our Applications, are referred to as the "**Platform**"). This Privacy Policy describes how we collect, use, and disclose information, governs how we treat this information, and lets you know your associated rights. The terms "The Basics," "we" and "us" refer to The Basics, Inc.

Our Platform contains links to other websites for your convenience and reference. We are not responsible for the privacy practices or the content of those sites.

### 1. Our Mission

The Basics's mission is to support families by providing essential tools and guidance for promoting early childhood learning and development.

### 2. Navigating this Privacy Policy

To help you navigate our Privacy Policy, we have divided it into numbered sections and provided a set of definitions in Section 23 (Definitions) to allow easy reference to key concepts.

### 3. Your Consent to this Privacy Policy

You indicate your consent to the terms of this Privacy Policy in different ways, depending on your relationship to the Platform. The procedures for consenting to this Privacy Policy are less formal if you are a casual visitor to our Site (a "**Guest User**") and more formal if you are, or are seeking to become, a registered user (a "**Registered User**").

**3.1 Consent by Guest User.** We have structured our Website so that, as a casual Website visitor, you are able to come to our Website and review selected information about our Services without providing us with any Personally Identifiable Information. By accessing and using our Platform as a visitor, you are acknowledging that you have read and understood this Privacy Policy and agree to be legally bound by it.

**3.2 Consent by Registered Users.** In order to participate in the Services, you must: (i) complete the registration process at our Platform; and (ii) indicate your consent to this Privacy Policy in the manner we specify during the registration process.

**3.3 Consent by User Acting in a Representative Capacity.** If you are agreeing to our Privacy Policy on behalf of a company or other legal entity, such as a Partner Organization ("**Your Organization**"), then (i) you represent and warrant that you have authority to act on behalf of, and to bind Your Organization, and (ii) for all purposes in this Privacy Policy, the term "you" means Your Organization on whose behalf you are acting.

**3.4 Right to Withdraw Consent.** You have the right to withdraw your consent at any time, in accordance with Section 14 (Your Right to Opt-Out; Object to Processing; Deleting Information).

### 4. Our Partner Organizations

The Basics Services are often made available to parents and caregivers through partner organizations, like early childhood centers, schools, health care organizations, employers, and social service agencies ("**Partner Organizations**"). Partner Organizations have independent relationships with parents and caregivers, and make our Platform and Services available to parents and caregivers as a supplement to their own services. Our Partner Organizations may be subject to privacy laws and other rules and policies.

If you have come to The Basics through a Partner Organization, your Partner Organization will have access to the Registered User accounts and associated child profiles for the Registered Users who are signed up through their Partner Organization access code, as described below. Partner Organizations also may initiate queries and account deletions from accounts within their partner code, as described below. A Partner Organization's access and authority is limited only to those accounts which it supports. Partner Organizations will not have access to any Personally Identifiable Information linked to survey responses or monitoring questions to which Registered Users may respond.

## 5. The Information We Collect

To provide our Services, and to otherwise conduct our business via the Platform, we rely on information provided by, and collected from, our users. In addition, this Privacy Policy also covers The Basics's treatment of any information about our users that our partners or other services might share with us. This information is collected in order to provide our Platform and Services to you and to continue to improve and enhance our Platform and Service offerings. This information may include, but is not limited to, that which you provide voluntarily through your interactions with the Platform, as well as information about how you use and navigate through the Platform and our Services. This information consists of the following:

**5.1 Personally Identifiable Information.** We collect certain information that identifies you as an individual (collectively, "**Personally Identifiable Information**"). The Personally Identifiable Information we collect may include the following:

### For Individual Registered Users:

- First name and last name
- Email address
- Phone number
- Your child's first name and birthdate
- Race and/or ethnicity
- The number of adult caregivers for your child
- A photograph of your child (optional)
- Geolocation data
- Other general information about your beliefs and behaviors
- Cookies and Usage Data
- Your device and/or hardware ID for your mobile device; and

### For Partner Organization Registered Users:

- First name and last name
- Email address
- Phone number
- Payment account information such as credit or debit card numbers (collected only by the Payment Processing Company, not by The Basics)
- Cookies and Usage Data
- Your device and/or hardware ID for your mobile device; and

**5.2 Non-Personally Identifiable Information.** We also collect technical and device-related information that is not Personally Identifiable Information, but instead identifies or may reasonably be used to identify a particular user device (collectively, "**Non-Personally Identifiable Information**"). Non-Personally Identifiable Information is typically collected automatically by technical means and, subject to Section 5.4 (Treatment of Combined Information), for purposes of our Platform consists of the following:

- Device identifiers, such as cookies;
- Device information, such as hardware and software settings;
- IP addresses and log information, such as your device's name, the type and version of your web browser, and referrer addresses that can function to identify a user device; and
- Tracking information that we, or a third party collects.

**5.3 Anonymous Information.** Our Platform also collects, processes, and/or uses information that does not identify you or your devices, including Personally Identifiable Information that has been made anonymous by: (i) removing identifying fields and aggregating the information with other information so that individual subjects of the information cannot be re-identified, or (ii) anonymizing the information with techniques that remove or modify the identifying data so as to prevent re-identification of the anonymized information (collectively, "**Anonymous Information**"). Information that meets these criteria might include, for example, demographic information, statistical information (e.g. page views and hit counts), and general tracking information.

**5.4 Treatment of Combined Information.** If we combine Non-Personally Identifiable Information or Anonymous Information with Personally Identifiable Information, we treat the resulting combination as Personally Identifiable Information.

## 6. How We Collect this Information

We collect the above information through the following means and technologies:

**6.1 Registration.** In order to provide you with certain Services, we need to collect certain Personally Identifiable Information, including the information specified in Section 5.1 (Personally Identifiable Information). For example, when you register to use certain password-protected Services or Applications on our Platform, you must provide a variety of Personally Identifiable Information to us in connection with creating a user account.

**6.2 Partner Organizations.** If you provide a partner code or connect through a link when you sign up, your account will be associated with a particular Partner Organization (such as your school district or health care provider), and you may be asked to specify what particular program or service you participate in with that Partner Organization (i.e. prenatal care, child-birth education, library services, or doctor's office). The Basics may also compare your sign-in information to the rosters and other information provided by the Partner Organization, to further specify the services and support you receive from that Partner Organization.

**6.3 Contacting Us.** You can contact us via the Platform with questions or comments. In order to communicate with us, you must provide certain Personally Identifiable Information.

**6.4 Payment Processing.** For Partner Organizations, if you pay for participation in our Services using our Platform, we may collect Personally Identifiable Information, including contact information and payment information (such as credit card number, expiration date, and security code), in connection with your order and purchase. This Information is used for billing purposes, contacting you about your payments, and sending you other communications. Please note that The Basics uses a reputable company (the "**Payment Processing Company**") to collect and process your payment information – The Basics does not collect or store your credit card information itself. The Payment Processing Company is obligated to protect Personally Identifiable Information it collects from you in compliance with our Privacy Policy.

**6.5 Requesting Information.** You can request information directly from The Basics via the Platform. To do so, you must provide certain Personally Identifiable Information, such as your name, your mailing address or email address, other specified contact information, and a description of the information you are requesting.

**6.6 Questionnaires and Surveys.** Our Platform may allow you to participate in surveys and/or questionnaires, which we may post on the Platform or send via text message from time to time. You are free to choose whether you participate in a survey or questionnaire. We may ask that, in addition to providing your responses, you also provide Personally Identifiable Information. In these instances, we use any information you provide to us for the purposes for which you submit the information. Survey and questionnaire information may be used for the purposes of monitoring or improving the use and appeal of the Platform and our Services, including research to gauge its effectiveness. Only research staff responsible for data management will see individually identifiable survey data, and their only use of such data will be preparing the data to be non-identifiable for research and analysis.

**6.7 Developmental Screening.** The Basics may provide a module for developmental screening, posing questions to parents about the activity of their children as a way to measure developmental level. The staff and administrators from The Basics will see summary results, but not your personal, identifiable responses. Only research staff responsible for data management will see individually identifiable developmental screening data, and their only use of such data will be preparing the data to be non-identifiable for research and analysis.

**6.8 Newsletters and Special Offers.** You can provide us with Personally Identifiable Information so that we can send you (i) newsletters about The Basics, our Services, and information about issues that we believe may be of interest to you, and (ii) special offers about our products and Services.

**6.9 Beacons and Tags.** The Platform may use certain data collection technologies that rely on (i) beacons; (ii) pixel tags and object hyperlinking tags, and (iii) other means to link an object to an Internet address, a remote software application, a remote database, or other remote means of receiving or processing information. We may use these technologies to tell us what parts of our Platform have been visited or to measure the effectiveness of searches that users perform on our Platform. These technologies also enable us to send email messages in a format users can efficiently read, to learn whether these email messages have been opened, and to help ensure, for example, that our messages are of interest to our users. These technologies provide us with Anonymous Information, Non-Personally Identifiable Information and, in certain instances, Personally Identifiable Information.

**6.10 Device Identifiers; Logs; IP Addresses.** To determine whether your device is supported by our Platform, we may collect certain information about your device and network, including your IP address, your operating system and browser, your device model, information about your use of the Platform, as well as the presence of any software that our Platform may require to operate with your device, or other third party software or mobile apps on your device. We automatically receive and record this information in log files, and this is generally Non-Personally Identifiable Information.

**6.11 Cookies.** A cookie is a small amount of data that is sent to your browser from a website's computers and stored on your computer's hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on our Platform and use them to recognize you when you return to our Platform. You may set your browser so that it does not accept cookies; however, you may need to enable cookies on your web browser if you wish to access certain personalized features of our Services. Cookies alone are typically Non-Personally Identifiable Information.

**6.12 Click-Throughs.** We may send email messages or display links that use a "click-through URL" linked to our Platform or to another resource. When you click one of these URLs, you pass through our web server before arriving at the destination website page or other resource. Click-throughs may use and collect Anonymous Information and Non-Personally Identifiable Information. We may track this click-through data for internal purposes to help determine interest in particular topics and measure the effectiveness of our user communications.

**6.13 Other Technologies and Data Sources.** We currently do not augment the Personally Identifiable Information that you provide to us with data from other third-party sources, such as privately-held marketing or analytics databases. We do not, for example, link your Personally Identifiable Information with third-party demographic information (such as age, sex, household income, job industry, or job title). If we later choose to use these data sources, or technologies other than those listed above in this Section 6 (How We Collect Your Information), we will treat any information we collect or generate in that manner in full accordance with this Privacy Policy.

**6.14 GDPR.** We do not intentionally target or otherwise seek to collect or receive Personally Identifiable Information from residents outside of the United States, such as from the European Economic Area. As such, we do not specifically address foreign laws such as the EU General Data Protection Regulation (“GDPR”) in this Policy, and will protect all Personally Identifiable Information as described by this Privacy Policy.

**7. How We Use this Information**

We use the information we collect or process, including Anonymous Information, Non-Personally Identifiable Information, and Personally Identifiable Information, as permitted under Applicable Law, including where the use is based on (i) the consent you provide to us at the point of collection as set out in Section 3.2 (Consent by Registered Users); (ii) performance of our agreement to provide you with the Services; (iii) compliance with our legal obligations; and/or (iv) our Legitimate Interests, as well as a third party's Legitimate Interests. More specifically, we use the information we collect for some or all of the following:

Our Use of the Information	Bases for Our Use
<p>To provide you with the information and Services you request and, specifically, to allow us to:</p> <ul style="list-style-type: none"> <li>• send you information via text message and email</li> <li>• send you questionnaires and surveys in connection with participation in our Services</li> <li>• to call you periodically to ask questions about your participation in the Services</li> <li>• to share information related to your participation in the Services and use of the Platform with Partner Organizations applicable to you</li> </ul>	<ul style="list-style-type: none"> <li>• Performance and management of our agreement with you</li> </ul>
<p>To follow-up regarding participation (or lack thereof) in our surveys</p>	<ul style="list-style-type: none"> <li>• Performance and management of our agreement with you</li> <li>• Your Consent</li> </ul>
<p>To respond to your inquiries</p>	<ul style="list-style-type: none"> <li>• Performance and management of our agreement with you</li> </ul>
<p>To customize your visit to and use of the Platform</p>	<ul style="list-style-type: none"> <li>• Our Legitimate Interests</li> </ul>
<p>To determine which Services and content (including marketing content) might interest you</p>	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Our Legitimate Interests</li> </ul>

Our Use of the Information	Bases for Our Use
To inform you of products and Services that we think would be appealing to you, whether the products or services are provided by us or by others and whether the products or services are available via our Platform or via some other channel (including channels operated by third parties); this includes information in the form of recommendations and endorsements that we might provide	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Our Legitimate Interests</li> </ul>
To track access to and use of our Platform, and conduct data and other analyses, including anonymization and aggregation of Personally Identifiable Information	<ul style="list-style-type: none"> <li>• Our Legitimate Interests</li> </ul>
To perform internal administration, auditing, operation, and troubleshooting for our Platform	<ul style="list-style-type: none"> <li>• Our Legitimate Interests</li> </ul>
To engage in the activities specified in Section 8 (How We Share This Information)	<ul style="list-style-type: none"> <li>• Our Legitimate Interests</li> <li>• Compliance with our legal obligations</li> <li>• Performance and management of our agreement with you</li> </ul>
To evaluate and improve our Platform and our communications, and to develop and test new services and content	<ul style="list-style-type: none"> <li>• Our Legitimate Interests</li> </ul>
To comply with Applicable Law	<ul style="list-style-type: none"> <li>• Compliance with our legal obligations</li> </ul>

Note that when determining the bases for our use of your information, we rely on what we consider to be the most appropriate basis, even if there are multiple bases available in connection with our use.

## 8. How We Share this Information

We value your privacy, and we share the information we collect only in the manner set out below.

**8.1 Our Service Providers.** We engage third parties to perform functions on our behalf, and these may include maintaining the Platform, collecting information, responding to and sending email or other messages, and other functions useful to our business. In this capacity, we may provide service providers with Personally Identifiable Information, Non-Personally Identifiable Information, and Anonymous Information as applicable. The following are examples:

- We may use service providers: (i) to host and manage the Platform; (ii) to facilitate payment (i.e., the Payment Processing Company); (iii) to process and distribute email or SMS messaging; and (iv) to manage surveys, promotions, special offers, and similar activities. These service providers generally require access to your Personally Identifiable Information in order to perform these services.
- We may use analytics service providers to assist us in understanding and using Non-Personally Identifiable Information and other information that we collect via the Site. A service we may use in this regard is Google Analytics, and information concerning how Google uses the information is available at

<https://policies.google.com/privacy/partners>, and opt-out options specific to Google Analytics are available at <https://tools.google.com/dlpage/gaoptout>.

- We may use service providers to anonymize and aggregate Personally Identifiable Information in order to generate Anonymous Information.
- We may engage service providers to analyze the interests and attributes of our users and, using techniques based on Anonymous Information and Non-Personally Identifiable Information, identify others who might share those interests and attributes. We then use this information to reach out to relevant market segments to provide them information concerning the Platform.
- Non-Personally Identifiable Information may also be used by our advertising service providers to support Online Behavioral Advertising, or Interest-based advertising as it is sometimes called. If you would like to learn more about Online Behavioral Advertising, please visit the "[For Consumers](#)" page on the AboutAds website. If you prefer that our advertising service providers do not know which pages you viewed on our website, you can opt-out on the "[Consumer Choice Page](#)" also located on the AboutAds website. **Note:** If you opt out of Online Behavioral Advertising, you may still receive online advertising from The Basics. Opting out from a specific advertising provider means that the ads you do receive will not be based on your preferences or behavior. Also, In order for Online Behavioral Advertising opt-outs to work, your browser must be set to accept cookies. Because the opt-out is registered for the specific computer and browser you use when submitting the opt-out, you will need to opt-out again if you delete the cookies from your computer, buy a new computer, access our website from a different computer, login under a different screen name, or change web browsers.

We do not permit our service providers to use the Personally Identifiable Information we give them for any purpose other than providing services to us.

**8.2 Our Partner Organizations.** We may disclose your Personally Identifiable Information, Non-Personally Identifiable Information, and Anonymous Information to the Partner Organizations with whom you are linked. Additionally, the Partner Organization who is involved in providing the Services to you will see summary survey results, but not your personal, identifiable responses. Our Partner Organizations commit to protect and use any Personally Identifiable Information received from The Basics in accordance with this Privacy Policy. Please note that any Personally Identifiable Information you provide directly to any Partner Organization is not governed by this Privacy Policy – please direct any concerns related to a Partner Organization’s use of Personally Identifiable Information directly to the applicable Partner Organization. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

**8.3 Questions of Harm; Legal Process.** We may disclose your Personally Identifiable Information and Non-Personally Identifiable Information to third parties, including law enforcement agencies, attorneys, and private investigator organizations, where it is necessary, or where we have a good faith belief that it is necessary:

- To comply with legal process;
- To protect and defend our rights and property, including the Platform and associated content;
- To protect against misuse or unauthorized use of our Services;
- To protect the personal safety or property of Platform users or the public, including your personal safety or property (it being understood that we assume no duty to provide, or monitor the need for, such protections); and

- To cooperate with public and government authorities including, where required, authorities outside your jurisdiction.

While you are not able to opt out of this use of information, we will take reasonable steps to limit such use, and disclose only the information we reasonably believe is necessary for the above purposes. If we receive legal process calling for the disclosure of your Personally Identifiable Information, we will attempt to notify you within a reasonable amount of time, unless such notification is not permitted.

**8.4 Transfer of the Platform.** We shall be entitled to transfer information that we collect (including Personally Identifiable Information) to a third party in connection with a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition (including a disposition in connection with a bankruptcy or similar proceedings) of all or substantially all assets or stock of the business unit or division responsible for the information under this Privacy Policy. Data obtained through the short code program will not be shared with any third parties for their marketing reasons/purposes.

**8.5 Our Affiliates.** We may choose to rely on and share the information we collect with our affiliates. By "affiliate" we mean an entity that is closely related to us, such as an entity that controls, is controlled by, or is under common control with The Basics. Our affiliates will be bound by the terms of this Privacy Policy.

## **9. Information to Third Parties**

As further set out in our Terms of Use, our Site may include links to third party websites offering services that augment those services offered on our Site. For example, when you submit information in connection with applying for a job at The Basics or when you submit payment information in connection with paying for products or Services, you are providing information (including Personally Identifiable Information) directly to third parties, and not to us. Those third parties determine their own data handling practices – any information that you submit to third parties are not governed by this Privacy Policy.

## **10. How We Safeguard the Information We Collect**

We recognize the sensitivity of our users' Personally Identifiable information and we have put in place security systems designed to prevent unauthorized access to or disclosure of this Information. Our security systems include physical, technical, and administrative information security controls, and we take commercially reasonable steps to secure and safeguard such Personally Identifiable Information in accordance with Applicable Law.

## **11. Our Retention of Data**

We retain Personally Identifiable Information for the period of time necessary to fulfill the purposes for which we obtained the Personally Identifiable Information and consistent with Applicable Law. We use the following criteria to set our retention periods: (i) the duration of our relationship with you; (ii) the existence of a legal obligation as to the retention period; and (iii) the advisability of retaining the information in light of our legal position (for example, in light of applicable statutes of limitations, litigation, or regulatory investigations).

## **12. Accuracy and Minimization of Data**

We take reasonable steps (i) to maintain the accuracy of the Personally Identifiable Information we process, and (ii) to limit the Personally Identifiable Information that we process to that which is reasonably necessary for the purposes for which we obtained the information.

## **13. Accessing and Updating Your Information**

If you would like to review, correct, or update the Personally Identifiable Information that you have provided to us, or if you would like to request an electronic copy of this Personally Identifiable Information for purposes of



transmitting it to another company (to the extent Applicable Law provides you with this right to data portability) you may make such requests by us as provided in Section 21 (Contact Us).

#### **14. Your Right to Opt-Out; Object to Processing; Deleting Information**

**14.1 Unsubscribing to Email and/or Texts.** If you no longer wish to receive email and/or text messages from us, you can opt out of this Service by either (1) following the "unsubscribe" instructions located near the bottom of each email or text message, or (2) contacting us as provided in Section 21 (Contact Us).

**14.2 Deleting Information.** If you request, we will take reasonable steps to remove your name and email address from our databases, within the time frames (if any) set out in Applicable Law. Please understand, however, that if you request the deletion of your information, you will no longer be able to receive our Services. In addition, it may be impractical (or essentially impossible) to remove the requested information completely, due to requirements promulgated by Applicable Law, and/or data backups and records of deletions. As such, certain Personally Identifiable Information may remain in our databases following the deletion of your account; we will continue to treat the remaining information (if any) in accordance with this Privacy Policy and Applicable Law.

**14.3 Objections.** If you object to our processing of your Personally Identifiable Information, and a request for us to delete this Information is not, in your view, sufficient, please contact us as provided in Section 21 (Contact Us).

**14.4 Anonymous Information.** We will not delete Anonymous Information from our database, and nothing in this Privacy Policy restricts our use of Anonymous Information.

#### **15. Advisory Regarding Participation by Children and Teens**

Under U.S. Federal Law (as reflected in the Children's Online Privacy Protection Act), WE DO NOT COLLECT OR STORE ANY PERSONALLY IDENTIFIABLE INFORMATION FROM INDIVIDUALS THAT WE KNOW ARE UNDER THE AGE OF 13. If you wish further information concerning privacy policies in general, and concerning online social networking and safety, you should visit the following website: <http://www.ftc.gov/privacy/index.html>.

#### **16. Relationship to Terms of Use; Incorporation of Terms of Use**

This Privacy Policy must be read in conjunction with our Terms of Use, and the provisions of our Terms of Use are incorporated herein. To the extent the Terms of Use conflict with the terms of this Privacy Policy, the terms of this Privacy Policy will control.

#### **17. Notice of Privacy Rights to California Residents**

California law requires certain businesses to respond to requests from California users who ask about business practices related to disclosing Personally Identifiable Information to third parties for direct marketing purposes. The California "Shine the Light" law further requires us to allow California residents to opt out of certain disclosures of Personally Identifiable Information to third parties for their direct marketing purposes. If you have questions about your rights under the California "Shine the Light" law, please contact us as provided in Section 21 (Contact Us).

Please be aware that beginning on January 1, 2020, pursuant California Civil Code Section 1798, et seq., known as the California Consumer Privacy Act (CCPA) all consumers in California will have the right to request that a business which collects a consumer's personal information disclose to that consumer the categories and specific pieces of personal information the business has collected. Additionally, the CCPA grants a consumer the right to request that a business that sells the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer: (1) the categories of personal information that the business collected about the consumer; (2) the categories of personal information that the business sold about the consumer and the categories of third parties to

whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold; and (3) the categories of personal information that the business disclosed about the consumer for a business purpose. Finally, the CCPA grants a consumer the right, at any time, to direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information (i.e., an "opt out" right). The CCPA sets out fairly detailed guidelines about how a company must communicate to consumers the right to opt out, how those companies can de-identify the data they seek to collect to work within the CCPA, and numerous other details about the safe-guarding and treatment of the at-issue data.

#### **18. Do Not Track Notice**

Our Website does not change its behavior when receiving "Do Not Track" signals from browser software.

#### **19. Complaints**

We want your feedback. If you have a suggestions on how we can improve our Services or complaints you would like us to address, please contact us at the address set out in Section 21 (Contact Us). If you are a California resident, you may report complaints to the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs. Other states may provide similar avenues for lodging complaints. Please check with your state's consumer protection authority.

#### **20. Changes to this Privacy Policy**

From time to time, we may change this Privacy Policy for our business purposes and to comply with changes in Applicable Law. In the event of any substantive or material changes, we will communicate these changes to you by posting the updated Privacy Policy on the Platform and/or notifying you of the change via the Platform, email, or other methods. Your continued use of the Platform following such notice constitutes your agreement to follow and be bound by the updated Privacy Policy.

#### **21. Contact Us**

If you have any questions about this Privacy Policy, the Platform, or your dealings with this Platform, please contact us at [info@thebasics.org](mailto:info@thebasics.org).

#### **22. Effective Date**

The effective date of this Privacy Policy is December 16, 2019.

#### **23. Definitions**

Below are definitions applicable throughout this Privacy Policy. Additional terms are defined in context.

**23.1 "Anonymous Information"** has the meaning set out in Section 5.3 (Anonymous Information).

**23.2 "Applicable Law"** means statutes, regulations, and any other laws that apply to the Website, the Services, the Applications, or the Platform.

**23.3 "Legitimate Interest"** means that there is a good reason for the processing your Personally Identifiable Information, and that the processing is carried out in a way that minimizes impacts (if any) on your privacy rights and interests. The term "Legitimate interest" also refers to our use of information in ways that you would reasonably expect, based on your relationship to us. For example, there is a Legitimate Interest in collecting and processing your Personally Identifiable Information: (i) to safeguard our Platform, networks, content, and related information and resources; (ii) to administer and generally conduct our business; and (iii) to prevent fraud.

**23.4** "**Non-Personally Identifiable Information**" has meaning set out in Section 5.2 (Non-Personally Identifiable Information).

**23.5** "**Personally Identifiable Information**" has meaning as set out in Section 5.1 (Personally Identifiable Information).

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