

PRIVACY POLICY

Welcome to Compass Working Capital where we are supporting families to build assets and financial capabilities as a pathway to greater economic opportunity and out of poverty. At Compass Working Capital we value our relationship of trust and confidence with our clients. We take our responsibility to protect the personal information you share with us very seriously. This Privacy Policy applies to information we collect when you visit our websites – www.compassworkingcapital.org and www.joinfss.org. It explains the information we collect on our websites and online and how we use your information.

If you enroll in any of our programs, we will collect and use your financial information in order to provide you with our educational services. To learn more about how Compass Working Capital collects, uses, and discloses personal information related to financial education services, visit our [GLBA Privacy Notice](#).

By visiting our websites, you consent to our collection and use of your information as described in this Privacy Policy.

1. Information We Collect and How We Collect It

We collect your personally identifiable information only when necessary to provide you with our services, and we keep it only for as long as necessary to fulfill our program requirements or comply with applicable law. We collect information in three ways: when you provide it to us, automatically by us, and from others.

(A) Information You Provide to Us

- **Contact Information.** When you sign up for our mailing list, workshops or ask about our programs, we collect contact information, such as your name, phone number, e-mail address, and mailing address.
- **Application Information.** When you apply to our programs, we may collect your name, email, phone number, current and previous address, social security number, date of birth, and other contact information. We may also collect demographic information, such as your age, gender and race/ethnicity, marital status and education.
- **Program Information.** When you participate in our programs, we may also collect your credit scores, housing and employment information, income, rent, tax information and program attendance. Our [Privacy Notice](#) and your specific program information release form and participation agreement further explains the information we can collect and how we maintain and share your personal information.
- **Credit Card Information.** If you make a donation through our website, we also collect your name, credit or debit card information, phone and mobile number, mailing address, e-mail address, and billing address to complete the transaction.

(B) Information We Collect Automatically

- **Usage Information.** We may also collect general information about your use of our website, such as your computer IP address, unique mobile device identifier, browser type, ISP or carrier name, and pages you access on our websites.
- **Social Media Information.** If you use Facebook, LinkedIn, Twitter, or other social media sites to sign up, we may collect the information that you submit through that site. When you “like” us on

Facebook or "follow" us on other social media sites, we will also collect your name and e-mail address from that site. If you submit information through social media sites, your information is governed by their privacy policies and information you share might be seen by the general public.

- **Information from Cookies.** Our website may use "cookies" to help you personalize your online browsing. A cookie is a string of text that a web page server stores on your computer to tell the server that you have returned. For example, if you bookmark our website, a cookie helps the site to recall your specific information on future visits. You can accept or decline cookies.
- **Tracking Technology and Do-Not-Track Requests.** We do not use any technology that tracks your online activities over time and across third-party web sites, nor do we plan on doing so in the future. Therefore, we offer no response to Do-Not-Track requests transmitted by web browsers.

We encourage you to review the privacy statements of websites you choose to link to from our site so that you can understand how those websites collect, use and share your information. Compass Working Capital is not responsible for the privacy statements or other content on websites outside of our websites.

(C) Information We Collect from Others

We also collect your personal information from others, such as credit bureaus, housing providers and other program partners. For example, we may receive your contact information from your housing provider. In addition, we will obtain your credit score as part of providing you with financial coaching services. We may also obtain rent, housing information and FSS escrow balances from your housing provider as part of your participation in our programs. You consent to the personal information we can receive from others in the information release form and participation agreement that applies to your specific Compass program.

2. How We Use Your Personal Information

We collect and use your personal information to provide you with our services, to communicate with you regarding your program, or to send you updates, newsletters, surveys and other communications that may be of interest to you. We may also use your personal information to meet our other compliance and regulatory duties, for example to retain certain records. From time to time, we may contact you on behalf of external service partners about a particular service or program that may be of interest to you. In those cases, your personally identifiable information (e-mail, name, address, telephone number) is not shared with third parties. Finally, we may use anonymous, de-identified, or aggregate information that does not reasonably identify you for any purpose.

3. How We Share Information

We do not sell, rent or share personal information with third parties for their own marketing purposes without your consent. We share your personal information with third parties in the following limited ways:

- **Employees and Consultants.** We may disclose information about you to our employees and consultants that need to know the information in order to help us deliver our services or to process the information for us. We require our employees and consultants to safeguard personal information that we share with them.
- **Program Providers.** We may share information about you with our trusted program partners (such as housing providers, multi-family owners and service organizations) who need to know information about you to provide services to you and help us administer our programs. The types

of data we share and how we share them are described further in your program's information release form and participation agreement. These partners are prohibited from using your personal information except to manage your specific program, and they are required to maintain the confidentiality of your information.

- **Third Party Vendors.** We also may share data about you with our third party vendors and services providers to provide their services to us. These vendors help us provide services to you, such as hosting our website and client management system, processing your credit / debit card information when you make a donation, or providing data analysis and research to help us evaluate the impact of our programs. All such third parties are prohibited from using your personal information except to provide these services to Compass Working Capital, and they are required to make privacy commitments in order to share information with them.
- **With Your Consent.** We may share and disclose information with your consent or as you request. For example, we may share your information with your housing provider or program providers as you authorize us to do so in the applicable information release form.
- **Aggregated and De-Identified Information.** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about our program participation and impact.
- **Compliance and Protection.** We reserve the right to disclose your personal information, without notice, if required by law or when we believe in good faith that disclosure is necessary to comply with law; defend against legal claims; or to protect the rights, property or safety of our organization, other users of the site, or the public; or to enforce our Terms of Use.

4. Information You Share Publicly

When you use our social media pages, you may share comments, reviews, stories, or other information. If you choose to submit this type of information to us, that information may be available to the general public. If you write a comment on our Facebook or another social media pages, remember that this information is governed by Facebook or the other website's privacy policy and this information may be viewed by the general public.

5. Security of Your Personal Information

We work hard to secure your personal information. We use reasonable and appropriate technical and organizational measures to protect your personal information against unauthorized access, use or disclosure. We also limit access to personal information about you to employees and consultants who reasonably need it to provide services to you, or to do their jobs. When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol. However, because no security system is perfect, we cannot completely guarantee the security of your information. In addition, we have no control over the security of other web sites that you might visit even when a link may appear to those web sites site from our site.

Compass Working Capital will ensure that we protect your privacy when sharing credit report information, whether in person, by video conference or over the phone. In order to do this, coaches will confirm your identity before providing a credit report OR discussing information that is pulled from a credit report. We have fully outlined this process in our [Identity Verification Procedures](#).

6. Opt-Out and Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving promotional messages from us. You may stop receiving emails from us by clicking the unsubscribe link at the bottom of the email or by contacting us at info@compassworkingcapital.org or by replying “STOP” to promotional text messages. If you opt out of promotional messages, we may still send you messages relating to your program, appointments and legal notices.

7. Links to Third-Party Sites

Our websites may contain links to websites, apps, tools, widgets and plug-ins operated by other companies for your convenience and information. These online services and third-party features may operate independently from us. We do not share your personal information with these third-parties and are not responsible for their privacy practices. Once you have left our websites, you should check the applicable privacy policy of the third-party online service to determine how they will handle any information they collect from you.

8. Children’s Information

Our websites and services are not designed for children under 13. We do not knowingly so collect personal information from children under 13 without parental consent and if we discover personal data from a child under the age of 13, we will eliminate that data. If you believe that a child under age 13 may have provided us with personal information without parental consent, please contact us.

9. Changes to this Policy

We reserve the right to change and update this Privacy Policy at our sole discretion. If we change this Privacy Policy, we will inform you by posting a notice on our website.

10. Contact Information

We welcome your questions or comments regarding this Privacy Policy. You can contact us at Compass Working Capital:

Address: 89 South Street, Suite 804, Boston, MA 02111

Email: info@compassworkingcapital.org.

Phone: (617) 790-0810.