

MASS ISLAND CORP PRIVACY POLICY

(Last updated on November 1, 2024)

This Privacy Policy for Mass Island Corp. ("we," "us," or "our"), describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Visit our website at <https://massisland.org/>, or any website of ours that links to this Privacy Policy, or
- Engage with us in other related ways, including any sales, services, marketing, project or events.

Questions or concerns? Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at legal@massisland.org.

Summary of Key Points

This summary provides key points from our Privacy Policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our *table of contents* below to find the Article you are looking for.

➤ **What personal information do we process?**

When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

➤ **Do we process any sensitive personal information?**

Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

➤ **Do we collect any information from third parties?**

We do not collect any information from third parties.

➤ **How do we process your information?**

We process your information to provide, improve, and administer our Services,

communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

➤ **In what situations and with which parties do we share personal information?**

We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

➤ **How do we keep your information safe?**

We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

➤ **What are your rights?**

Depending on what jurisdiction you are geographically located in, the applicable privacy law may mean you have certain rights regarding your personal information.

➤ **How do you exercise your rights?**

The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

To learn more about what we do with any information we collect, please review this Privacy Policy in full.

Article I. What Information Do We Collect

- (1) In brief, we collect personal information that you disclose to us. We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.
- (2) The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following: names, phone numbers, email addresses, mailing addresses, and contact preferences
- (3) We do not process sensitive information.

- (4) All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Article II. How We Process Your Information

- (1) In brief, we process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.
- (2) We process your personal information for a variety of reasons, depending on how you interact with our Services, including:
- (a) To deliver and facilitate delivery of services to the user: we may process your information to provide you with the requested service.
 - (b) To respond to user inquiries/offer support to users: we may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
 - (c) To send administrative information to you: we may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
 - (d) To fulfill and manage your orders: we may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
 - (e) To request feedback: we may process your information when necessary to request feedback and to contact you about your use of our Services.
 - (f) To send you marketing and promotional communications: we may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.
 - (g) To post testimonials: we may post testimonials on our Services that may contain personal information.
 - (h) To evaluate and improve our Services, products, marketing, and your experience: we may process your information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
 - (i) To determine the effectiveness of our marketing and promotional campaigns: we may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

- (j) To comply with our legal obligations: we may process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.

Article III. When and with Whom We Share Your Personal Information

- (1) In brief, we may share information in specific situations described in this Article and/or with the following third parties. We may need to share your personal information in the following situations:
 - (a) Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
 - (b) Business Partners: we may share your information with our business partners to offer you certain products, services, or promotions.

Article IV. Our Use of Cookies and Other Tracking Technologies

- (1) In brief, we may use cookies and other tracking technologies to collect and store your information. We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.
- (2) We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.
- (3) To the extent these online tracking technologies are deemed to be a "sale"/"sharing" (which includes targeted advertising, as defined under the applicable laws) under applicable US state laws, you can opt out of these online tracking technologies by submitting a request as described below under Article *"United States Residents' Specific Privacy Rights"*.
- (4) Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

Article V. How Long We Keep Your Information

- (1) In brief, we keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.

- (2) We only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).
- (3) When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Article VI. How We Keep Your Information Safe

- (1) In brief, we aim to protect your personal information through a system of organizational and technical security measures. We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Article VII. Your Privacy Rights

- (1) In brief, you may review, change, or terminate your account at any time, depending on your country, province, or state of residence.
- (2) **Withdrawing your consent:** if we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the Article *"How You Contact Us about This Policy"* below.
- (3) However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- (4) **Cookies and similar technologies:** most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

- (5) If you have questions or comments about your privacy rights, you may email us at legal@massisland.org.

Article VIII. Controls for Do-Not-Track Features

- (1) Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.
- (2) California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

Article IX. United States' Residents' Specific Privacy Rights

- (1) In brief, if you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.
- (2) Categories of personal information we collect: we have collected the following categories of personal information in the past twelve (12) months:
- (a) Identifiers (such as contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name): we collected.
 - (b) Personal information as defined in the California Customer Records statute (such as name, contact information, education, employment, employment history, and financial information): we collected.
 - (c) Protected classification characteristics under state or federal law (such as gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data): we collected.

- (d) Commercial information (such as transaction information, purchase history, financial details, and payment information): we collected.
 - (e) Biometric information (such as fingerprints and voiceprints): we did not collect.
 - (f) Internet or other similar network activity: (such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements): we did not collect.
 - (g) Geolocation data (such as device location): we did not collect.
 - (h) Audio, electronic, sensory, or similar information (such as images and audio, video or call recordings created in connection with our business activities): we did not collect.
 - (i) Professional or employment-related information (such as business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us): we collected.
 - (j) Education Information (such as student records and directory information): we collected.
 - (k) Inferences drawn from collected personal information (such as inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics): we did not collect.
 - (l) Sensitive personal information: we did not collect.
- (3) We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of: Receiving help through our customer support channels; Participation in customer surveys or contests; and Facilitation in the delivery of our Services and to respond to your inquiries.
- (4) We will use and retain the collected personal information as needed to provide the Services or for Category (h), as long as the user has an account with us.
- (5) Will your information be shared with anyone else: we may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information. We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

(6) Your rights: you have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- (a) Right to know whether or not we are processing your personal data
- (b) Right to access your personal data
- (c) Right to correct inaccuracies in your personal data
- (d) Right to request the deletion of your personal data
- (e) Right to obtain a copy of the personal data you previously shared with us
- (f) Right to non-discrimination for exercising your rights
- (g) Right to opt out of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling").

(7) Depending upon the state where you live, you may also have the following rights:

- (a) Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesota's privacy law).
- (b) Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law).
- (c) Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota's and Oregon's privacy law).
- (d) Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including Minnesota's privacy law).
- (e) Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California's privacy law).
- (f) Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida's privacy law).

(8) How to exercise your rights: to exercise these rights, you can contact us by submitting a data subject access request, by emailing us at legal@massisland.org, or by referring to the contact

details at the bottom of this document. Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

- (9) Request verification: upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.
- (10) Appeals: under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at legal@massisland.org. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.
- (11) California "Shine The Light" Law: *California Civil Code Section 1798.83*, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the Article *"How You Can Contact Us about This Policy"*.

Article X. Other Regions' Specific Privacy Rights.

- (1) In brief, you may have additional rights based on the country you reside in. In Australia, we collect and process your personal information under the obligations and conditions set by *Australia's Privacy Act 1988* (Privacy Act). This Privacy Policy satisfies the notice requirements defined in the Privacy Act, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information. If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular: offer you the products or services that you want respond to or help with your requests At any time, you have the right to request access to or correction of your personal information. You can make

such a request by contacting us by using the contact details provided in the section "How You Can Review, Update, or Delete the Data We Collect from You". If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner.

Article XI. Our Updates to This Policy.

- (1) In brief, we will update this notice as necessary to stay compliant with relevant laws. We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

Article XII. How You Can Contact Us about This Policy.

- (1) If you have questions or comments about this notice, you may email us at legal@massisland.org or contact us by post at: Mass Island Corp, P.O. Box 550031, Waltham, MA 02455, United States.

Article XIII. How You Can Review, Update, or Delete the Data We Collect from You

- (1) Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please email us a data subject access request at legal@massisland.org.