Privacy Notice

26 October 2026

Navigating our Privacy Notice

Our Privacy Notice is designed to be clear and informative, providing you with all the information you need about how we collect and use your personal data. Sections 1 to 12 cover the most important information about how we handle your personal information to provide our Services and Website.

Appendix 1 includes a detailed table with more information about the personal data we collect, how we use it, who we share it with, and the legal basis for processing that data. Appendix 2 provides more information on the necessary cookies we use to run our Website.

1. Introduction

At Founders Pledge ("**we**", "**us**", "**our**"), we value the protection and management of your personal information. As a registered charity in England and Wales (charity number 1162201) and a charitable company limited by guarantee incorporated and registered in England and Wales (company number 08565148), we take your privacy seriously and follow strict data protection standards. We want you to feel comfortable and confident using our Services, and our commitment to your privacy is reflected in this Privacy Notice. It outlines how we collect, process, and disclose personal data when you engage with our **Website** (https://founderspledge.com/), our donor-advised fund services, our charitable advisory services, and other products and services falling under this Privacy Notice (referred to collectively as the "**Services**").

This Privacy Notice covers the data practices of **Founders Pledge Ltd** and its affiliated entities, including **Founders Pledge Inc.** and **Founders Pledge gGmbH** (collectively the **"Founders Pledge Group"**). It explains how we handle the personal data we collect through your use of our Services, as well as your interactions with us on social media or any other dealings you may have with us.

Founders Pledge Ltd is the data controller responsible for the personal data covered by this Privacy Notice, regardless of where you are based. Where personal data is processed by Founders Pledge Inc. or Founders Pledge gGmbH, those entities do so in accordance with this Privacy Notice and under appropriate data sharing arrangements with Founders Pledge Ltd.

We take our role as custodians of your personal information seriously and strive to fulfill our data protection obligations. If you have any questions or concerns about how we handle your

personal data, please don't hesitate to reach out to us. You can find our contact information in Section 12 of this Privacy Notice.

To ensure that we comply with all applicable privacy regulations, we have designated a Data Protection Officer who assists us in upholding the highest standards of privacy and data security.

Data Protection Officer:
Legal Nodes Ltd (Company number 11668206)
Address: Office 2, Bennet's House, 21 Leyton Road, Harpenden, England, AL5 2HU
Contact person's details: dpo.founderspledge@legalnodes.com

2. Information we collect and receive about you

At Founders Pledge, we collect and receive information in different ways through operating our Services and Website, and through other interactions with us. The main categories of personal data we collect and receive includes:

- **Contact Information**. For example, names, personal and/or work email addresses, home and/or work addresses, phone numbers.
- **Identification Information.** For example, passport number, driving license details, or national identity card information, used solely for verification purposes.
- **Company Information.** For example, company name, company location, job title.
- **Financial Information.** For example, pledge commitment, value of charitable gifts, source of funds, tax residency.
- **Charitable Giving Information**. For example, cause area interests, previous charitable giving experience.
- **Cookies and Analytics.** For example, IP location, the browser and device used to access our Website.

We may collect additional information with your consent. This information may include, but is not limited to, family information, religious or philosophical beliefs, health data (e.g. dietary requirements or requests for reasonable adjustments), and other financial information, such as estimates of net wealth.

3. Purposes for which we use your data

At Founders Pledge, we will only use your personal data if we have a lawful basis.

The specific purposes for which we process your personal data, and the lawful basis applicable to each, are set out in detail in Appendix 1.

By way of overview, the most common lawful bases we rely on are:

- **Consent:** In some cases, we may process your personal data only if we obtain your prior consent.
- **Performance of a contract:** We will require your personal data to offer you the services in accordance with the contract terms between you and us.
- **Compliance with a legal obligation:** Due to the nature of the services we provide, the laws applicable to our activities require us to collect and store certain data about you.
- **Legitimate interests:** Sometimes, we rely on our legitimate interests to process your data. The specific legitimate interests we rely on for each category of data subject are set out in Appendix 1. We will only do so unless these interests are overridden by your interests or fundamental rights and freedoms.
- **Explicit consent:** In some cases, such as when collecting special categories of data (e.g. data concerning health, philosophical and religious beliefs), we may process your data only if we obtain your explicit consent to such processing pursuant to Article 9.1 and 9.2(a) GDPR/UK GDPR.

If you do not provide the personal data required to access our Services, or if we are legally obligated to process personal data, you may not be able to use our Services. We need this data to fulfill our obligations and comply with the law. So, providing certain personal data is necessary to use our Services.

3A. Marketing Communications

This section explains how we use your personal data to send you marketing information, and the choices you have about that use. It should be read together with the table at Appendix 1, which sets out the lawful basis we rely on for each category of individual, and with the consent options presented to you when you sign up for a DAF or Account.

Where you have previously expressed an interest in our products or services (and have not opted out of marketing), we will use your name and email address to send you updates because it is in our legitimate interests to promote our other products and services that we think you might be interested in.

Where you are a new supporter, Member, Donor or Authorised Advisor and have opted in to receive updates on our products and services, including offers and promotions, we will process your personal data to provide you with these updates in line with the preferences you have given us, and we will only use your personal data in this way with your consent.

You can withdraw your consent to marketing at any time by contacting us at info@founderspledge.com, by following the unsubscribe link included in any marketing communication you receive from us, or by updating your preferences in your Account settings. Withdrawing your consent will not affect the lawfulness of any marketing communications we sent you before you withdrew consent.

Please note that, where you opt out of or withdraw consent to marketing communications, this will not apply to service-related or transactional communications that are necessary for us to provide our Services to you (for example, donation receipts, Gift Aid confirmations, DAF statements, grant status updates, and administrative notices about your Account).

4. Cookies & Website Analytics

Our Services use cookies for various purposes, including providing you with a seamless browsing and login experience. Cookies are small files that we store on your browser or device's hard drive, containing letters and numbers. You can block cookies by adjusting your browser settings, but please note that this may limit your access to certain parts or all of our Website. We use essential cookies for website operation and optional analytics cookies, including Google Analytics, to help us understand how our website is used. We only place non essential cookies on your device with your prior consent. Details of the cookies we use are set out in Appendix 2.

We embed YouTube videos on our website using YouTube's privacy-enhanced mode (youtube-nocookie.com). No cookies are set by YouTube unless you choose to play a video.

We use Simple Analytics for our website analytics. Simple Analytics collects and processes only anonymised and aggregated metrics in a privacy-friendly manner. The data helps us understand how visitors interact with our website and the sources of our traffic.

It's important to note that Simple Analytics doesn't collect personal data. They prioritize privacy and provide us with aggregated and anonymized information to help us understand and improve the user experience on our website.

For more information about how Simple Analytics processes data, visit their website at https://www.simpleanalytics.com/.

We also use Google Analytics to help us understand how visitors use our website. Google Analytics uses cookies to collect information about how visitors interact with our website, including IP address, pages visited, and time spent on each page. This involves sharing data with Google LLC , which may process it in the United States.

For more information on how Google handles this data, see Google's Privacy Policy at https://policies.google.com/privacy.

You can opt out of Google Analytics tracking at any time by via your cookie preferences or installing the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.

5. Sources of Personal Data

We obtain most of your personal data directly from you, either when you register to use our Services or communicate with us. In some cases, we may also receive personal data about you from third parties and publicly accessible sources, such as social media platforms (e.g., LinkedIn), introductions made by existing members, public databases (e.g., Crunchbase), and analytics providers, among others.

Additionally, we may collect usage data automatically through the use of cookies and similar technologies when you use our Services. This helps us understand how you interact with our Services and improve your overall experience.

We combine the data received directly from you with information obtained from third parties and publicly accessible sources, as well as automatically collected usage data, to provide you with a comprehensive and optimized user experience.

We may also receive personal data about you from third-party organisations, such as companies or employers that have partnered with us to make our services available to their employees or members. Where we receive personal data about you in this way, we will use it only for the purposes described in this Privacy Notice and in Appendix 1, and we will provide you with this Privacy Notice at or before the point at which we first contact you.

6. Protecting your Personal Data

We take the security and protection of your personal data very seriously. We use reasonable and appropriate technical and organizational measures to ensure the safety of your information. Our measures are designed to prevent loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction of personal data.

We implement robust security protocols and stay up-to-date with industry best practices to maintain the confidentiality, integrity, and availability of the personal data you entrust to us.

We continuously review and enhance our security measures to address emerging threats and maintain a high level of data protection. Your information is important to us, and we strive to safeguard it to the best of our ability.

7. Retaining your Personal Data

We will keep your personal data only as long as necessary to fulfill the specific purpose for which we collected it. This means we will keep it for as long as we need to meet any legal, accounting, or reporting requirements, or to serve our legitimate interests. For example, we will

keep most of your data for up to 7 years after our business relationship with you ends. However, we may need to keep certain information, such as tax residency details, for a longer period to comply with our legal obligations.

In some cases, authorities may require us to keep personal data for an extended period, such as in an ongoing investigation.

Our data retention practices comply with applicable laws and regulations and we ensure the appropriate protection and security of your personal data.

8. Your Rights

You have specific rights regarding the collection and processing of your personal data, which you can exercise, subject to applicable exceptions. These rights include:

- **Confirmation and Access:** You can ask us to confirm whether we process your personal data and to access the personal data we have processed.
- **Correction:** You can request correction of inaccuracies in your personal data held by us.
- **Withdrawal of Consent:** You can withdraw your consent and request the removal of your personal data that we collected based on your consent. This includes opting out from receiving marketing communications from us.
- **Restriction of Processing:** You can request the restriction of processing of your personal data, such as when you contest the accuracy of the data, for a period allowing us to verify its accuracy.
- **Data Portability:** If technically feasible and not infringing on the rights and freedoms of others, you can have your personal data transmitted directly from one data controller to another.
- **Erasure:** Under certain circumstances, you can request the erasure of your personal data. Please refer to the “How long do we keep your personal data” section for more information on our data retention obligations.
- **Objection:** You can object to the processing of your personal data when such processing is carried out for the performance of tasks in the public interest or the exercise of official authority vested in us.

To exercise any of the above rights, please contact us at info@founderspledge.com, providing your name and specifying the right you wish to exercise.

You can also lodge a complaint with us or the ICO, the supervisory authority for data protection issues in the UK. If you are based outside of the UK, you can find the relevant supervisory authority for your jurisdiction here.

We aim to provide you with information on the actions taken in response to your request regarding your rights within one month of receiving the request. If the request is complex or if

there is a large number of requests being processed, the response time may be extended by two additional months. In such cases, we will inform you of the extension and provide the reasons for the delay within one month of receiving the request.

9. Sharing your personal data

We will share your data with the following third parties:

- Legal entities in the Founders Pledge Group;
- Professional advisors such as lawyers, accountants, banks, auditors, or insurers;
- Law enforcement, government, and regulators, or other third parties as required by applicable law or regulation (including but not limited to the Charity Commission for England and Wales, the ICO and HMRC);
- Suppliers or subcontractors involved in the performance of any contract we have with you;
- If you are a Member, with Authorised Advisors of a DAF of your choice and according to the level of access you have decided to grant them, namely your giving history and transactions/DAF balance; and/or
- Where you have joined Founders Pledge through a corporate partnership arrangement, with the relevant corporate partner for the purpose of administering any match funding or employee benefits arrangement under that partnership. This may include sharing your name and details of contributions made by you to your DAF account (including the nature and value of those contributions) where this is necessary to enable the relevant corporate partner to calculate and pay match-funded contributions.

In addition,except for those employees participating under a corporate partnership scheme, we may share the name and email addresses of business professionals with Pledge Ventures Limited (company number 14306490, registered address Salisbury House (Unit 562) 29 Finsbury Circus, London, England, EC2M 5QQ) based on our legitimate interests of fostering our membership community. Pledge Ventures may then contact you to inquire about your interest in their products and services. To opt out of having your data shared with Pledge Ventures Limited, please contact our team at info@founderspledge.com.

If Members consent, we will also share your contact information with other Members (current and prospective) to facilitate networking and community connection.

Please note that we only share your personal information with third parties as outlined in this Privacy Notice.

If we transfer your personal data to service providers or other recipients located outside the UK or the European Economic Area (EEA), we will take appropriate measures to safeguard your personal data. For transfers from the UK by Founders Pledge Ltd, this includes implementing International Data Transfer Agreements (IDTAs) issued by the Information Commissioner's

Office, or — where the recipient is certified under the UK-US Data Bridge — relying on that framework as the transfer mechanism. For transfers made by our German entity, Founders Pledge gGmbH, we use Standard Contractual Clauses approved by the European Commission. Where a supplier or service provider processes your personal data on our behalf, or as an independent controller for its own purposes, we require it to have appropriate safeguards in place for any international transfer of your personal data. If you would like more information about the specific mechanism used for any particular transfer, please contact us.

We may also disclose your personal data in the following circumstances:

- To affiliates and subsidiaries within the Founders Pledge Group, including parent and ultimate holding companies, affiliates, subsidiaries, business units, and future legal entities acquired by the Founders Pledge Group;
- In the event of a merger, acquisition, sale, change of control, or similar transaction or proceeding;
- To establish, exercise, or defend legal claims; and/or
- With your consent to the disclosure.

10. Privacy Notice updates

We may need to update this Privacy Notice from time to time. If we make significant changes to how we collect, process, or use your personal information, we will let you know by posting the updated Privacy Notice on our Website or through other appropriate communication methods.

11. Contact Us

If you have any questions about this Privacy Notice or our privacy practices, or if you want to exercise any of your rights, please contact us at info@founderspledge.com. You can also contact our Data Protection Officer at dpo.founderspledge@legalnodes.com.

If you live in the UK, you have the right to file a complaint with the ICO (Information Commissioner's Office). For those residing in the EEA, you have the right to make a complaint to the data protection supervisory authority in your usual residence, workplace, or the place where the alleged violation occurred.

Founders Pledge

Appendix 1. Personal Data Table

Data Subject	Purpose	Personal Data	Lawful Bases for Processing	Data Sharing
Members (includes Members' families and prospective Members)	**To provide our Services to Members, such as:** - Onboarding and offboarding - Advising on effective giving - Providing giving support infrastructure - Providing event information - Operating and monitoring the website - Conducting internal analytics for service improvement and impact measurement - To send marketing communications, event invitations and information about our	**Required:** Contact Information Identification Information Company Information Financial Information Charitable Giving Information Cookies and Website Analytics **Optional:** Family Information Religious & Philosophical Beliefs Health Information	Performance of a contract / Legitimate interests (service delivery, advisory services and analytics) Explicit consent / Consent (processing of special category data, including health information and religious/philosophical beliefs) Compliance with a legal obligation (financial and regulatory obligations) Consent / Legitimate interests (marketing)	Third-party systems (e.g. email service providers, CRM, mailing list management software) Suppliers and service providers involved in delivering our Services (e.g. payment and donation-processing providers); Other Members (where consent is provided) Event providers / hosts (e.g. hotels, restaurants) Corporate partners (where applicable, in connection with match funding or employee benefits arrangements)

	services where you have consented, or where we are otherwise permitted by law			
Authorised Advisors of a DAF	**To provide our Services to Authorised Advisors of a DAF, such as:** - Onboarding and offboarding - Providing infrastructure for Members DAF management - Operating and monitoring the website member /app - Conducting internal analytics for service improvement and impact measurement - To send marketing communications, event invitations and information about our services where you have consented, or	**Required:** Contact Information Identification Information Cookies and Website Analytics **Optional:** Company Information	Performance of a contract / Legitimate interests (service delivery and analytics) Compliance with a legal obligation (financial and regulatory obligations) Consent / Legitimate interests (marketing)	Third-party systems (e.g. email service providers, CRM, mailing list management software) Suppliers and service providers involved in delivering our Services (e.g. payment and donation-processing providers); Event providers / hosts (e.g. hotels, restaurants) Corporate partners (where applicable, in connection with match funding or employee benefits arrangements)

	where we are otherwise permitted by law			
Donors (includes Donors' families and prospective Donors)	**To provide our Services to Donors, such as:** - Onboarding and offboarding - Receiving gifts and providing infrastructure for ongoing giving - Operating and monitoring the website - Conducting internal analytics for service improvement and impact measurement - To send marketing communications, event invitations and information about our services where you have consented, or where we are otherwise permitted by law	**Required:** Contact Information Identification Information Financial Information Cookies and Website Analytics **Optional:** Company Information Family Information Charitable Giving Information	Performance of a contract / Legitimate interests (service delivery and analytics) Explicit consent / Consent (special category data, including health information and charitable giving preferences) Compliance with a legal obligation (financial and regulatory obligations) Consent / Legitimate interests (marketing)	Third-party systems (e.g. email service providers, CRM, mailing list management software) Suppliers and service providers involved in delivering our Services (e.g. payment and donation-processing providers); Event providers / hosts (e.g. hotels, restaurants)
Non-member Donors	To process donations and provide associated giving support, such as:	Required: Contact Information Financial Information Optional:	Performance of a contract / Legitimate interests (donation	Third-party systems (e.g. payment processors, CRM,

	- Processing charitable donations - Administering Gift Aid claims - Issuing donation receipts and confirmations - Operating and monitoring the website - Conducting internal analytics for service improvement and impact measurement - To send marketing communications, event invitations and information about our services where you have consented, or where we are otherwise permitted by law	Charitable Giving Information	processing, Gift Aid and analytics) Compliance with a legal obligation (financial and Gift Aid obligations) Consent / Legitimate interests (marketing) Compliance with a legal obligation	mailing list management software) Suppliers and service providers involved in delivering our Services (e.g. payment and donation-processing providers); HMRC (for Gift Aid administration)
Grantees	**To provide our Services to Grantees, such as:** - Providing grants and making grant payments from our Members and funds - Verifying grantee information	**Required:** Contact Information Company Information Identification Information	Performance of a contract / Legitimate interests (grant delivery and ongoing monitoring) Consent / Legitimate interests (promoting the work of Founders Pledge and grantees, including publishing identifiable content) Compliance with a legal obligation (financial and	Third-party systems (e.g. email service providers, CRM, mailing list management software) Event providers / hosts (e.g. hotels, restaurants)

	- Promoting the work of Founders Pledge and our grantees. This includes publishing (via social media, websites, reports, newsletters or otherwise) identifiable photographs, videos, names, and/or quotes provided by or relating to grantees and individuals associated with funded projects. - Ongoing monitoring of grant conditions - To send marketing communications, event invitations and information about our services where you have consented, or where we are otherwise permitted by law		regulatory obligations) Consent / Legitimate interests (marketing)	
Individuals associated with funded projects (including employees, volunteers, and beneficiaries of grantee organisations)	Promoting the work of Founders Pledge and its grantees, including publishing identifiable photographs, videos, names, and/or quotes in reports, on our website, social media, and newsletters	Names, images, and quotes (as shared with us by grantee organisations)	Consent Legitimate interests	Third-party systems (e.g. website platform, social media platforms, CRM)

Suppliers	**To facilitate the purchase of goods and services and the ongoing management of contractual relationships**	**Required:** Contact Information Company Information	Performance of a contract / Legitimate interests (contract management and procurement) Compliance with a legal obligation (financial and regulatory obligations) Performance of a contract Compliance with a legal obligation	Third-party systems (e.g. email service providers, CRM, mailing list management software)
Website/App Users	**To provide a functioning website/app experience for all visitors to our website/app, including Members, Authorised Advisors of a DAF, Donors, Grantees, and Suppliers**	**Required:** Cookies and Website Analytics	Legitimate interests (website functionality and analytics) / Consent (where applicable for non-essential cookies)	Simple Analytics
Event attendees	**To manage and facilitate events, such as:** - Registering attendance and managing logistics (e.g. dietary requirements, accessibility needs) - Facilitating networking and engagement among attendees	**Required:** Contact Information, Company Information **Optional:** Health Information	Performance of a contract / Legitimate interests (event logistics, registration and networking) Consent / Legitimate interests (promotional content and event photography) Consent / Legitimate interests (marketing)	Third-party systems (e.g. event management platforms, venue providers)

	- Promoting our events and community. This includes publishing (via social media, website, reports, newsletters, or otherwise) identifiable photographs, videos, names, and/or quotes of attendees. - To send marketing communications, event invitations and information about our services where you have consented, or where we are otherwise permitted by law			
Charity trustees	To manage and facilitate charity governance, oversight, and compliance with legal and regulatory obligations (e.g., filings with the Charity Commission and Companies House).	Contact Information, Identification Information, Biography/Professional details.	Compliance with a legal obligation (regulatory filings with Charity Commission and Companies House) / Legitimate interests (governance management and trustee oversight)	Regulatory bodies (e.g., Charity Commission, Companies House, HMRC), Professional advisors.

Appendix 2. Cookies Table

Strictly Necessary Cookies (cannot be disabled, no consent required)

Cookie	**Purpose**	**Duration**
_founders_pledge_session	Identifies the user Session	Session
remember_user_token	Identifies the user even after Session is over, allowing us to keep you logged into our member app	In 14 days
cc_cookie	Stores the user's cookie preferences	90 days
auth.*, __Secure-next-auth.*, __Host-next-auth.csrf-token	Internal auth details	Session
__stripe_mid	Cookie is set by Stripe's JavaScript (usually via Stripe.js or Checkout) as part of its fraud prevention and risk assessment system.	1 year
__vdpl	Vercel cookie that pins a user's session to a specific deployment, preventing version-mismatch errors when a new deployment goes live mid-session.	Session

Analytics Cookies (require consent, can be withdrawn via the preference centre)

Cookie	Purpose	Duration
_ga	Google Analytics — used to distinguish users and throttle request rate	2 years
_ga_YS6EC6Y6KY	Google Analytics — used to persist session state, recording session identifiers, session start time, and session count to distinguish new and returning visits	2 years
Simple Analytics tracking pixel on public website	Simple Analytics is cookieless and not used on the member app. If you refuse analytics cookies, you will automatically reject the tracking pixel as well.	N/A