

Privacy Notice

0. 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 UK charity (charity number 1162201) and a limited company (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/>) and other online 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**. 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.

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

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 most common bases we use 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 (such as to improve our services), and we will 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.

4. Cookies & Website Analytics

Our Services may 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, including essential cookies. We currently use only essential cookies necessary for website operation. Should we decide to use non-essential cookies in the future, we will obtain your consent beforehand. If we introduce any non-essential cookies in the future, we will seek your consent beforehand.

We use Simple Analytics for our website analytics. Simple Analytics collects and processes anonymous 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/>.

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.

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:

- Companies in the Founders Pledge Group
- Professional advisors such as lawyers, banks, auditors, or insurers
- Law enforcement, government, and regulatory agencies, or other third parties as required by applicable law or regulation
- Suppliers or subcontractors involved in the performance of any contract we have with you
- If you are a Member, with DAF Advisors of your choice and according to the level of access you have decided to grant them, namely your giving history and transactions/DAF balance

In addition, we may share the name and email addresses of business professionals with Pledge Ventures Limited (company number 14306490, registered address: 20 St Thomas Street, London, SE1 9RS) 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.

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 located outside the UK or the European Economic Area (EEA), we will take appropriate measures to safeguard your personal data. This includes implementing International Data Transfer Agreements [issued](#) by the Information Commissioner (UK) and utilizing Standard Contractual Clauses [approved](#) by the European Commission. If you would like more information about the specific mechanisms used by us for transferring your personal data outside the UK or the EEA, please contact us. Additionally, Founders Pledge requires its service providers to implement adequate security measures to protect your personal data in accordance with applicable data protection laws.

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

- To relevant government agencies and regulatory authorities as required by applicable laws (e.g., tax authorities)
- To affiliates and subsidiaries within the Founders Pledge Group, including parent and ultimate holding companies, affiliates, subsidiaries, business units, and future companies acquired by the Founders Pledge Group
- In the event of a merger, acquisition, sale, change of control, or similar transaction or proceeding
- To professional advisors such as lawyers, accountants, and auditors
- With your consent to the disclosure
- To establish, exercise, or defend legal claims.

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.

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: <ul style="list-style-type: none"> - 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 	Required: Contact Information Identification Information Company Information Financial Information Charitable Giving Information Cookies and Website Analytics Optional: Family Information Religious & Philosophical Beliefs Health Information	Consent Legitimate interests Performance of a contract Explicit consent Compliance with a legal obligation	Third-party systems (e.g. email service providers, CRM, mailing list management software) Event providers / hosts (e.g. hotels, restaurants)
DAF Advisors	To provide our Services to DAF Advisors, such as:	Required: Contact Information Identification Information	Consent Legitimate interests Performance of a contract	Third-party systems (e.g. email service providers, CRM, mailing list management)

	<ul style="list-style-type: none"> - Onboarding and offboarding - Providing infrastructure for Members DAF management - Operating and monitoring the websitemember /app - Conducting internal analytics for service improvement and impact measurement 	<p>Cookies and Website Analytics</p> <p>Optional: Company Information</p>	Compliance with a legal obligation	software) Event providers / hosts (e.g. hotels, restaurants)
<p>Donors (includes Donors' families and prospective Donors)</p>	<p>To provide our Services to Donors, such as:</p> <ul style="list-style-type: none"> - Onboarding and offboarding - Receiving gifts and providing infrastructure for ongoing giving - Operating and monitoring the website - Conducting internal 	<p>Required: Contact Information Identification Information Financial Information Cookies and Website Analytics</p> <p>Optional: Company Information Family Information Charitable Giving Information</p>	<p>Consent Legitimate interests Performance of a contract Explicit consent Compliance with a legal obligation</p>	<p>Third-party systems (e.g. email service providers, CRM, mailing list management software) Event providers / hosts (e.g. hotels, restaurants)</p>

	analytics for service improvement and impact measurement			
Grantees	<p>To provide our Services to Grantees, such as:</p> <ul style="list-style-type: none"> - Providing grants and making grant payments from our Members and funds - Verifying grantee information - Promoting the work of Founders Pledge and our grantees - Ongoing monitoring of grant conditions 	<p>Required: Contact Information Company Information Identification Information</p>	<p>Consent Legitimate interests Performance of a contract Compliance with a legal obligation</p>	<p>Third-party systems (e.g. email service providers, CRM, mailing list management software) Event providers / hosts (e.g. hotels, restaurants)</p>
Non-members Donors	<p>To process your donation and, if applicable, to administer the Gift Aid scheme.</p>	<p>Required: Contact information (e.g. full name and email address) Financial information (e.g. donation amount, frequency, payment information, payment method) Home address (if you have opted into Gift Aid)</p>	<p>Performance of a contract Compliance with a legal obligation</p>	<p>Third-party systems (e.g. email service providers, CRM, mailing list management software, payment processing provider, nonprofit donation platform)</p>

Suppliers	To facilitate the purchase of goods and services and the ongoing management of contractual relationships	Required: Contact Information Company Information	Consent Legitimate interests 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, DAF Advisors, Donors, Grantees, and Suppliers	Required: Cookies and Website Analytics	Legitimate interests	Simple Analytics

Appendix 2. Cookies Table

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
auth.redirect, auth.strategy, auth._token_expiration.prod, auth.*.local, auth.npt_help_modal, auth._refresh_token_expiration.prod, auth._refresh_token.prod, auth._token.prod, __Secure-next-auth.session-token, __Secure-next-auth.callback-url, __Host-next-auth.csrf-token	Internal auth details	Session
t3D, tADe, tADu, tAE, tC, tMQ, tnsApp, tPL, tTDe, tTDu, tTE, tTf	Cookies which serve the purpose of content delivery and presentation. The cookies keep the correct state of font, blog/picture sliders, color themes and other website settings.	Persistent
cc_cookie	Stores the user's cookie preferences	90 days