

Donable[®] Privacy Policy

Updated May 4, 2023

Donable's[®] Privacy Policy applies to all Donable[®] users, including Recruiters and Donors, and to all Donable[®] platforms and services, including our applications, websites, technology, and other services (collectively, the "Donable[®] Platform"). This policy describes how personal data is collected, used, and shared and only applies to personal information and not to aggregate information or other information that does not identify you.

Certain elements of the Donable[®] Platform may operate under separate or additional terms or practices that are different from or in addition to those described in this policy. When a component of the Donable[®] Platform is governed by separate or additional terms, you will be provided notice of and access to such terms. For example, Donable[®] uses Stripe Connect ("Stripe"), a third-party, to facilitate the payment services for the Recruiter. Within Donable[®], certain personal information is collected by Stripe to verify the Recruiter's identity, facilitate payment, and provide tax forms. The information collected from a Recruiter by Stripe is subject to [Stripe's Privacy Policy](#). By registering as a Donable[®] Recruiter, you agree to the [Stripe Connected Account Agreement](#), which facilitates compensation.

The Donable[®] Platform includes a downloadable software application that allows a Donable[®] Recruiter to schedule an appointment for a blood donor at a participating donor center location. When a Donor fulfills an appointment scheduled by a Donable[®] Recruiter, the Recruiter receives compensation. Donable[®] collects personal information provided directly by its users, including both the Recruiter and the Donor. We understand the importance of protecting your information. This Privacy Policy explains how Donable[®] collects, processes, uses, and shares your personal information through the Donable[®] Platform.

You may review this Privacy Policy, the Terms of Service, and Agent Agreement at any time at [Privacy Policy](#), [Terms of Service](#), and [Agent Agreement](#). Please familiarize yourself with our privacy practices, accessible below, and contact us at support@donableapp.com if you have any questions.

By using Donable[®], you are consenting to the practices described in this Privacy Policy.

Personal Data at Donable[®]

We collect your personal information so Donable[®] can work.

The Donable[®] Platform collects personal information for the Recruiter and the Donor. The Recruiter enters his or her own personal information directly into the mobile

application. The Donor provides his or her personal information to the Recruiter who then enters it into the mobile application. The personal information collected that encompasses personal data differs between the Recruiter and the Donor.

Information You Provide to Us

The Recruiter. You begin by creating an account with Donable[®], which includes creating an account with Stripe so you can receive payment. We collect the information you provide us, such as your name, date of birth, email address, phone number, and mailing address. Donable[®] shares this information with Stripe, and then Stripe collects additional information from you that is necessary for you to receive payment and is governed by [Stripe's Privacy Policy](#) and the [Stripe Connected Account Agreement](#).

The Donor. We collect your information to link you with your Recruiter and enable the Recruiter to schedule you for a blood donation appointment at a participating donor center location. You provide your information to the Recruiter, who enters it into the Donable[®] mobile application. The information you provide includes your name, mobile phone number, date of birth, zip code, and email address.

Feedback. Recruiters can provide feedback about the Donable[®] Platform, and we collect all information you provide in your feedback.

Information Provided to Us by Participating Donor Centers

Donors who have previously donated at a participating donor center have already provided their personal information to that entity, which is stored in the center's scheduling software. The Donable[®] Platform interfaces with the scheduling software to determine if the Donable[®] Donor is a new or existing Donor. If the Donor is an existing Donor, then his or her personal information that is stored in the scheduling software, including blood type, previous donation dates, previous donation types, and donor eligibility, is shared with Donable[®] and is viewable by the Recruiter after the Donor approves the Recruiter via email or text message.

Is Donable[®] HIPPA Compliant?

Donable[®] is not required to be compliant with the Health Information Portability and Accountability Act ("HIPAA"). The final HIPAA regulations provide that the procurement or banking of blood is "not considered to be health care." As a result, the Donor information provided by participating donor centers to Donable[®] is not subject to the specific privacy and security standards of HIPPA.

Nevertheless, medical conditions and diagnoses of Donors are never shared with Recruiters. If a Donor is ineligible to donate because of a condition, diagnosis, or medication, the Donable[®] Platform only displays the Donor's status as ineligible to the Recruiter and does not provide a reason for ineligibility.

Your Privacy Rights and Requests

We respect your right to know, access, correct, restrict, or delete your personal data. Requests about your personal data should be emailed to support@donableapp.com. When contacting us about your personal data, please provide your name, address, email address, and the personal information you wish to access, modify, or delete. Before processing any requests about personal data, we need to verify the requestor's identity. If we cannot verify your identity, we will be unable to process the request.

While you may always access, correct, and restrict your personal data, there may be other situations where we cannot grant your request to modify or delete your personal data – for example, when complying with the law. We may also deny a request if it jeopardizes the privacy of others, is frivolous or vexatious, would be extremely impractical, or for a similar legitimate purpose. Additionally, we may retain your personal data if reasonably necessary to comply with our legal obligations, including law enforcement requests, to meet regulatory requirements, to resolve disputes, to maintain security, to prevent fraud and abuse, to enforce obligations, or to fulfill any other request from you, such as opting-out of further messages or a request for your data. We will not discriminate against you for exercising any of your rights under this Privacy Policy or applicable law. We do not charge a fee to process or respond to your verified consumer request, unless it is excessive, repetitive, or manifestly unfounded. If we determine that your request warrants a fee, we will notify you with a cost estimate prior to processing your request.

Please note that if we modify or delete some or all of your personal information, it may impact the functionality of the Donable® Platform.

Donable® does not sell or disclose your data, including as “sale” is defined in Nevada and California.

If you live in California and cannot access the Donable® Privacy Policy, you or your authorized agent may request it at support@donableapp.com or by calling 1-877-340-8777.

How Donable® Uses Your Information

We use your information to enable Recruiters to recruit and schedule Donors at participating donor centers using the Donable® Platform. We also use your data to maintain security, provide support, improve the Donable® Platform, and to respond to legal proceedings. More specifically, we use your data to:

1. Provide Services: We use your personal information to:

- create and maintain Recruiter accounts;
- maintain Donor information;
- determine if a Donor is a new or returning Donor for a participating donor center;
- schedule an appointment for a Donor;
- send notifications to a Donor about a scheduled appointment;
- send bonus pay opportunities to Recruiters;

- connect Recruiters to Stripe to facilitate payments;
 - calculate payments;
 - allow Recruiters to connect with the Donors they have recruited; and
 - communicate with Recruiters about their use of the Donable® Platform.
2. **Maintain Safety and Security.** We use your personal information to help maintain the safety, security, and integrity of the Donable® Platform. All activities performed by Donable® are necessary to fulfill the terms of our agreements with users and/or for the purposes of the legitimate safety and security interests of Donable® and our users.
 3. **Provide Customer Support.** We work to provide the best experience possible, including support when you need it. To do so, we use your personal information to investigate and assist you in resolving questions or issues you have regarding the Donable® Platform, provide you support, and respond to you.
 4. **Troubleshoot and Improve Services.** We use your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of the Donable® Platform.

How Donable® Shares Your Information

We do not share or sell your personal information to third parties for money. No person or entity can buy the personal information we collect from and about you. We do not act as a data broker. However, we do share your personal information and data with other users, participating donor centers, and third-party service providers - including Stripe, which facilitates payments to Recruiters. We may also share your personal information if required by law. More specifically, we share your data with:

1. **Other Users:** Recruiters seek out Donors. Interested Donors provide their personal information to the Recruiter, who enters it into the Donable® mobile application. Donors then receive a message via email or text, requiring them to approve the Recruiter. When a Donor approves a Recruiter, the Donor's name, email address, contact information, and blood type remains viewable by the Recruiter within the Donable® mobile application. This allows the Recruiter to schedule an appointment for the Donor at a participating donor center location. The Donor's appointment information is shared with the Recruiter in the Donable® mobile application and with the Donor via email or text message. When a Donor fulfills an appointment, that information is shared with the Recruiter, who receives compensation. Recruiters are also able to see what blood product was donated and when the Donor is eligible to Donate.
2. **Service Providers:** Donable® may engage third parties to act as our service providers and to perform certain tasks on our behalf, such as processing or storing data in connection with your use of our services. Donable® service providers are obligated to handle personal data consistent with this Privacy Policy. They may not use the personal data we share for their own purposes.

3. **Payment Provider.** Donable® has engaged Stripe Connect to facilitate payments to Recruiters. Donable® shares the personal information provided by the Recruiter with Stripe, and Stripe collects additional personal information from the Recruiter that is needed to verify the recruiter and to provide the Recruiter with payment and tax documents. All information collected by Stripe is governed by [Stripe's Privacy Policy](#).
4. **Participating Donor Center Locations:** The Donable® Platform interfaces with donor centers' scheduling software to determine if a Donable® Donor is an existing Donor at a center. To do so, Donable® shares the Donor's personal information with the center. Additionally, when a Donor is scheduled at a center, the Donor's information is shared with the center's scheduling software to create a Donor account with the center and to schedule the donation appointment.
5. **Compliance with Legal Obligations:** In certain cases, we may use or share your personal information to comply with laws, including but not limited to: (a) in response to requests from local, state or federal law enforcement officials; (b) in response to any judicial, administrative, or similar proceeding such as a subpoena; (c) when required by law; or (d) in special circumstances such as in response to a physical threat or perceived physical threat to any individual; (e) in connection with a sale or all or substantially all of our assets or a merger or corporate reorganization or similar arrangement; or (f) to enforce the terms of use of the Site.

Donable® Security

We design our system with your security and privacy in mind. We use encryption protocols and security measures consistent with industry standards to provide enhanced protection. While the privacy and security measures will reasonably protect your information, there is always a risk that an unauthorized third party will find a way to breach our security system or intercept the information you transmitted to us. We are not responsible for circumvention of privacy settings or security measures contained within the Donable® Platform.

Does Donable® Use Cookies?

No, the Donable® Platform does not use cookies.

Donable® Is NOT For Children

We understand the importance of safeguarding the personal data of children. We neither collect nor maintain information from anyone known to be under the age of 18. No part of the Donable® Platform is designed to attract or be used by anyone under the age of 18. If we discover or receive notice that a child under the age of 18 has accessed the Donable® Platform in violation of this policy, we will delete the information as soon as possible. If you believe Donable® may have any information from or regarding a child under the age of 18, please contact us support@donableapp.com. This policy complies with the Children's Online Privacy Protection Act (COPPA).

Modifications to the Privacy Policy

We may modify this Privacy Policy at any time. The date at the top of this policy indicates the last date of revision. If material changes are made to the Privacy Policy, we may notify you by email using the email address you provided or via a push notification in the mobile application. Additionally, we may post a notice on the home page of the Donable® website. You are responsible for periodically viewing this Privacy Policy and ensuring we have a valid, current email address for you.

Privacy Questions

If you have questions about Donable® Privacy Policy, would like to contact us, or would like to submit a complaint, you can contact us at support@donableapp.com.

We take privacy questions seriously. In most cases, all substantive contacts receive a response within seven business days. In other cases, we may require additional information or will let you know that we need more time to respond.

If you have a complaint that indicates an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. If a privacy issue has resulted in a negative impact on you or another person, we will take steps to address it with the affected individual directly.

California Privacy Disclosures

California Privacy Rights

California consumers have a right to knowledge, access, and deletion of their personal information under the California Consumer Privacy Act. California consumers also have a right to opt out of the sale of their personal information by a business and a right not to be discriminated against for exercising one of their California privacy rights. Donable® does not sell the personal information of any of its users and does not discriminate in response to privacy rights requests.

California consumers with a Donable® account can exercise their rights directly or through an authorized agent by making a request to support@donableapp.com.

Do Not Track

Donable® does not track its customers over time or across third party websites to provide targeted advertising and, therefore, does not respond to Do Not Track (DNT) signals.