

# Ian Wallace Scholarship Fund

**Privacy Policy** 

The Ian James Wallace Scholarship Fund ("The Fund"), a Colorado nonprofit corporation, respects your privacy; therefore, this privacy notice ("Notice") has been developed to ensure that when dealing with The Fund, that The Fund deals with the highest level of commitment and integrity with respect to those visiting the site. This Notice shall apply to all of our products and services including our Web site.

The Notice guides how we collect, store and use information about customers and prospects, and it will be periodically reviewed to reflect legal, technological and other developments. In that event, the changes will appear at this location.

Please note that privacy notices advising customers and prospects as to the specific uses that are being made of their Personally-Identifiable Information by specific business units within The Fund may also be modified from time to time to reflect changes in business practices. In this event, those changes will appear in the relevant privacy notices.

The Fund will also comply with applicable non-U.S. laws that impose additional responsibilities on The Fund beyond those stated in this Policy in connection with the treatment of Personally-Identifiable Information about its customers and prospects.

When you fill out a Web form on one of our Web sites, or send us an email message, you are providing information about yourself, which may include your e-mail address, street address, telephone number and credit card number. We will use this information you provide to fulfill your request or respond to your inquiry. Credit card information is used only to fulfill a sale, and is not shared with anyone. At every point where we collect personal information about you, we offer you the opportunity to "opt out" of letting us share information about you. Our Web site does not use or collect "cookie" information.

Our Policy recognizes two kinds of personal data that deserve varying levels of protection. Personally-Identifiable Information includes, for example, e-mail addresses, billing information, employment status and "click stream" data that tracks user activity on a Web site or online service. A subset of that category, Sensitive Data, deserves additional safeguards. Sensitive Data includes, by way of example, Social Security numbers, personal financial data (such as specific salary, net worth or individual portfolio information) and information about specific medical conditions.

With respect to information collected, The Fund shall follow the following policies:

#### 1. Collection.

Personally-Identifiable Information will only be collected to the extent that The Fund deems reasonably necessary to serve a legitimate business purpose. Please be aware that if you disclose Personally-Identifiable Information on Web site message boards or chat areas, that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond the control of The Fund or any of its staff members.

### 2. Notification.

Customers and prospects will be notified (usually at the point where Personally-Identifiable Information is collected) as to the uses the business unit may make of the Personally-Identifiable Information collected from them.

3. Choice: Opt Out for External Distribution of Personally-Identifiable Information.

Customers and prospects will be given the opportunity to refuse permission for External Distribution of their name, address or other Personally-Identifiable Information through an Opt Out mechanism. (External Distribution does not include certain limited distributions such as sharing Personally-Identifiable Information with an entity working on behalf of The Fund to serve our customers; transfer of Personally-Identifiable Information in conjunction with the sale or similar transfer of a business unit; or the disclosure of Personally-Identifiable Information in connection with legal proceedings, investigations of crimes or other wrongdoing. However, sharing Personally-Identifiable Information with an entity working on behalf of The Fund or transferring Personally-Identifiable Information in conjunction with the sale or similar transfer of a business unit is considered an Onward Transfer and will be handled as described below.)

## 4. Security.

Appropriate safeguards will be implemented in an effort to ensure the security, integrity and privacy of Personally-Identifiable Information about our customers and prospects.

## 5. Access: Review and correction.

Procedures have been developed through which customers and prospects can, upon request, review and correct the Personally-Identifiable Information that has been collected from them by The Fund. These procedures may not, however, compromise the security, integrity and privacy of either The Fund's own proprietary databases or databases licensed from third party companies.

## 6. Sensitive Data.

The collection and use of Sensitive Data carries with it special obligations and responsibilities in order to maintain the data's security, integrity and privacy. Sensitive Data will not be rented or otherwise made available for External Distribution outside The Fund (although it may be made available through Onward Transfer as described below). Customers and prospects will be given the opportunity to refuse permission for their Sensitive Data to be distributed outside of the business unit that collected the Sensitive Data through use of an Opt Out mechanism for Internal Distribution within The Fund.

### 7. Onward Transfer.

Whenever The Fund permits a third party outside of The Fund to access Personally-Identifiable Information through either External Distribution or Onward Transfer, commercially appropriate procedures will be followed to help ensure that the Information is used only for authorized purposes and by authorized persons in a manner consistent with the choices customers and prospects have made under this Policy, and that the security, integrity and privacy of the information is maintained. Please note that our Web sites may contain links to other Web Sites that have their own privacy policies and practices. While The Fund will employ commercially appropriate procedures to help ensure that your information is only used for authorized purposes as described above, The Fund cannot make any guarantees with respect to the actions or policies of such third parties.

Children: Collection and use of information from children in the U.S. under the age of thirteen will be made in compliance with the Children's Online Privacy Act of 1998. Specifically, The Fund will:

- a. provide parents or guardians with Notice of our information practices;
- b. obtain prior verifiable parental or guardian consent for the collection, use, and/or disclosure of Personally-Identifiable Information from children;
- c. provide a parent or guardian, upon request, with the means to review the Personally-Identifiable Information collected from his or her child;
- d. provide a parent or guardian with the opportunity to prevent the further use of Personally-Identifiable Information that has already been collected, or the future collection of Personally-Identifiable Information, from that child;
- e. limit collection of Personally-Identifiable Information for a child's online participation in a game, prize offer or other activities to Personally-Identifiable Information that is reasonably necessary to participate in the activity; and
- f. establish procedures to protect the confidentiality, security and integrity of the Personally-Identifiable Information collected from children.

Questions and comments? The Fund's Privacy Policy has been developed out of respect for the privacy preferences and choices of our customers and prospects. We have established procedures to ensure that every reasonable effort is made to address your concerns.

To ensure that we follow our stated Policy, we also conduct periodic and random reviews of our Web sites and other products and services. The results of our reviews are shared with our Board of Directors. A report may be requested.

All information entered on this Web site is stored in a secure database in the U.S. and access is limited to authorized persons. For more information on our privacy practices, send an email to ian@ianwallywallace.com, or call 303-766-4762. If you would like to confirm the accuracy of the specific information we have collected from you, please mail a written request to James J. Wallace, Ian James Wallace Scholarship Fund, 16748-9C East Smokey Hill Road, #334, Centennial, Colorado 80015.