

CONSULTATIVE SERVICES PRIVACY POLICY NOTICE

Campbell & Company respects your privacy and is committed to the security of the data we process. This privacy policy notice provides information on how we collect and process data in delivering consultative services. It is organized into eight sections:

1. Purpose of Data Processing
2. How We Get Data
3. Data We Process
4. Legal Basis for Data Processing
5. Use of Data After Processing
6. Rights of the Individual
7. Contacting Campbell & Company
8. Updates to this Privacy Policy Notice

1. PURPOSE OF DATA PROCESSING

In our consultative services, we process constituent data and provide analysis to support recommendations regarding strategy, goal setting, tactics, and messaging, and to evaluate progress.

2. HOW WE GET DATA

The majority of data we process in providing consultative services is provided by our clients. Our clients are nonprofit organizations who have collected data from individuals and organizations.

Additional data are obtained through the following ways:

- Research of publicly available information about constituents. This data may be added to data sets that are provided by our clients.
- Surveys conducted on behalf of our clients.
- Focus groups and interviews conducted on behalf of our clients.

3. DATA WE PROCESS

The categories of data that we collect are outlined in the table below. The table is organized into four parts:

- Category: The type of data that we are collecting

- Direct/Indirect: How the data relates to individual persons: either directly or indirectly. Direct or (directly related) means that the data by itself can identify you as an individual. Indirect (or indirectly related) means that the data are related to you as an individual, but would only be able to be connected to you if other direct identifiers were also present.
- Description: Details regarding the category of data collected are provided.
- Purpose: Why we need to collect this data.

Category	Direct/ Indirect	Description	Purpose
Constituent Biographical and Contact Information	Direct	Biographical and identifying information may include addresses, name, spouse name, identification code/number, relationship to the organization, and staff contact assigned to constituent.	To identify constituent as a potential donor to the organization. Names and addresses are used to household those who live at the same address.
Constituent Interactions	Direct	Interaction refers to contact that a staff member has had with a constituent such as phone call, in person meeting, email, etc.	To determine how the staff is interacting with constituents.
Proposal	Indirect	A proposal refers to a plan to ask a constituent for a certain dollar amount to support a project or the organization more generally. Information gathered may include the amount and date that the ask was made, the amount and date of the gift expected, the amount and date of the gift ultimately given, the status of the proposal, the name and ID of the staff member who is in charge of the proposal, and	To determine how many potential gifts may be given to the organization during a set period and to provide insight on a prospect's capacity to make a gift.

Category	Direct/ Indirect	Description	Purpose
		what the proposed gift would be supporting.	
Gifts	Indirect	A gift is a contribution to the organization for a project or the organization in general. The gift information gathered may include the gift amount, gift identifier number/code, ID of the constituent who gave the gift, ID of the constituent who got credit for bringing in the gift, purpose of the gift, gift date, and whether gift is cash or another giving vehicle.	To track the amount and number of contributions given to an organization during a set period.
Funds	Indirect	A fund is an accounting mechanism used by the organization to track the designation of contributions. Information collected could include the fund name and unique identifier.	To track the project that constituents have or will give to support during a set period.
Ratings	Direct	Ratings are done by a third-party or are inputted by staff assigned to evaluate a constituent based on publicly available asset information. The information collected could include all "ratings" in the database assigned to constituents.	To inform the potential amount a constituent could give to an organization during a certain time period and their inclination toward making a gift.
Focus Groups	Direct	Focus groups include a small group of people and are conducted specific to a topic of inquiry requested by our client. Personal data, beyond demographic data outlined in the first row of this table, would include personal opinions,	In order to be able to support specific data analysis for a prescribed scope of work, data that are not already in the client's possession may need to be collected. A focus group is one of our tools to collect data.

Category	Direct/ Indirect	Description	Purpose
		reactions, perspectives, and/or experiences that each individual within the focus group may have in relation to the topic under consideration.	<p>A focus group allows us to obtain a diversified qualitative data set to points of view that a group of people have on a specific subject.</p> <p>These points of view are to gain perspective and are not being used to create profiles of these individuals outside of the context of the focus group's defined scope.</p>
Interviews	Direct	Interviews serve the same purpose as Focus Groups. The main difference is the one-to-one relationship the data collected has to the relative identity of the person being interviewed. Data is often collected long form on paper and then transferred to an electronic format.	<p>In order to be able to provide specific data analysis for a prescribed scope of work, data that are not already in the client's possession may need to be collected. An interview is one of our tools to collect data.</p> <p>Interviews allow us to obtain individual ideas, perceptions, and opinions.</p>
Surveys	Direct	Beyond demographic data that may be requested as outlined above, surveys are specific to the scope of work that the client has asked us to engage with constituents. As such, a brief privacy notice will be provided to the survey participant prior to participation in the survey. The survey itself will request consent to participate, and in cases where the participant data is directly linked to someone's personal	<p>In order to be able to provide specific data analysis for a prescribed scope of work, data that are not already in the client's possession may need to be collected. Surveys are one of our tools to collect data.</p> <p>Surveys allow us to gather a larger quantity of feedback from constituents on a specific topic of interest defined by the scope of work.</p>

Category	Direct/ Indirect	Description	Purpose
		<p>data, the length of data retention will be provided.</p> <p>Campbell & Company uses a third-party application, called SoGo Survey to digitally capture responses to the surveys we conduct for our clients. To learn more about SoGo, please click here or navigate to https://www.sogosurvey.com/survey-privacy/</p>	
Anonymization of Data	N/A	<p>A subset of the data that we receive from our clients to conduct consultative services may be extracted and anonymized. When our data sets are anonymized, we remove direct personal identifiers and only utilize data elements that are essential for the research and development activity. At the point of anonymization, Campbell & Company will no longer be able to identify a unique individual or be able to make inferences pertaining to a unique individual.</p>	<p>For the purposes of our own service development process we use anonymized data to refine our process and create new service offerings to our clients.</p>

4. LEGAL BASIS FOR DATA PROCESSING

Campbell & Company processes data on behalf of clients as outlined in our professional services agreement. The client has agreed to this contract and the data sharing provisions outlined within it. Upon receipt of data provided by the client to Campbell & Company, it has been confirmed that a lawful basis for sharing the data has been identified and that consent to have Campbell & Company process the data has been obtained.

In the event that Campbell & Company's consultants collect data on behalf of the client through interviews, surveys, and/or focus groups, consent from the individual will be obtained at the time the data collection takes place. Campbell & Company also makes use of data that is publicly available.

5. USE OF DATA AFTER PROCESSING

All data provided by the client for processing is retained by Campbell & Company for a limited period necessary to fulfill the purposes outlined in the professional services agreement, up to one year after the completion of the professional services agreement. Campbell & Company shall comply with all reasonable directions provided by the client with respect to the return, disposal, or preservation of client provided data. Campbell & Company does not sell data to any individual or entity.

6. RIGHTS OF THE INDIVIDUAL

The individual constituents whose data are processed by Campbell & Company have the following rights related to protecting personal information.

- **Right to Know:** The individual constituent has a right to know how their data is collected, used, and stored.
- **Right to File Complaint:** Individual constituents may file a complaint with Campbell & Company to express concerns related to how data is being processed.
- **Right to Access:** Individual constituents, who are not employees or board members of a client, have a right to access information about data being stored about them. To request a copy of the data specific to an individual constituent, the request must be made in writing by email.
- **Right to Data Portability:** All individual requests to access data that are approved per legal requirements will be fulfilled through a common data format. These formats will either be a comma-separated values (CSV) file or a Portable Document Format (PDF) document.
- **Right to be Forgotten:** A constituent may request that their individual data be erased. A request for erasure will be reviewed, and a decision communicated to the requestor as required by law.

7. CONTACTING CAMPBELL & COMPANY

Questions about how personal data is processed, used, and stored can be directed to the Campbell & Company privacy team by contacting us at ccrequest@campbellcompany.com or by calling toll free at 877-957-0000.

8. UPDATES TO THIS PRIVACY POLICY NOTICE

Campbell & Company reserves the right to change this privacy policy notice as needed. Notification of changes will be posted on the Campbell & Company website, www.campbellcompany.com and will be communicated

to all nonprofit clients so that they can notify each constituent. The date at the top of the privacy policy notice shows the date of the most recent privacy policy notice and references the date of the version it is replacing.