

Effective July 28, 2023

## PRIVACY POLICY

### RISKFREEITEMSHOP.COM

1. About RISKFREEITEMSHOP.COM. STAR Capital Corp, a California corporation doing business as RISKFREEITEMSHOP.COM (RFIS) operates the [www.riskfreeitemshop.com](http://www.riskfreeitemshop.com), [www.riskfreeitemshop.net](http://www.riskfreeitemshop.net) and [www.intelligencereport.info](http://www.intelligencereport.info) websites, which sells consignment vacations, packages, experiences and items for nonprofit, school and church organizations to utilize for their fundraising events, and works through a vendor to generate AI reports for insights and predictive analytics on your donor database.
2. Identity of Parties. “You” and “Your” refer to any non-profit organization that uses the RFIS website.
3. Data that RFIS Collects. RFIS only collects “*Organization Data*,” i.e., data that you enter that identifies your organization, e.g., organization name, physical address and primary contact name, email address, and phone number. In addition, RFIS also collects website usage data (“*Usage Data*”), e.g., the duration of a page visit.
4. Data that RFIS Does Not Collect. RFIS uses an outside service provider, Boodle, Inc., a Delaware corporation and doing business as Boodle.ai (“*Boodle*”) for all other data collection (“*Personal Data*”) that you input into RFIS’ databank is. Personal Data is what your organization chooses to upload from your contact database in order for Boodle to generate a “*Donor Intelligence Report*.” Any Personal Data that you upload on the RFIS website goes directly to Boodle, and at no time is it on RFIS servers nor is it available to RFIS. To see how Boodle handles your data, go to <https://boodle.ai/privacy-policy/>.
5. Items Purchased by You. RFIS will only use Organization Data to process any purchases made by you from RFIS.
6. Location Data. We may use and store information about your location if you give us permission to do so. We use this data to provide features of our Service, to improve and customize our Service. You can enable or disable location services when you use our Service at any time by way of your device settings.
7. Tracking and Cookies Data. We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use: we use (i) Session Cookies to operate our Service; (ii) Preference Cookies to remember your preferences and various settings, and (iii) Security Cookies for security purposes.
8. Legal Basis for Processing Personal Data Under the General Data Protection Regulations (GDPR). If you are from the European Economic Area (EEA), RFIS’ legal basis for collecting and using the Organization Data depends on the Organization Data that we collect and the

specific context in which we collect it. RFIS may process your Organization Data because (i) We need to perform a contract with you, (ii) You have given us permission to do so, (iii) The processing is in our legitimate interests, and it is not overridden by your rights, (iv) For payment processing purposes and (v) to comply with the law.

For information on the legal basis for Personal Data, please refer to the Boodle privacy policy.

9. Retention of Data. RFIS will retain your Organization Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Organization Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Organization Data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

For information about retention of Personal Data, please refer to the Boodle privacy policy.

10. Retention of Usage Data. RFIS will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when these data are used to strengthen the security or to improve the functionality of our services, or we are legally obligated to retain this data for longer periods.

11. Transfer of Data. Your Organization Data may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. For information about the transfer of Personal Data, please refer to the Boodle privacy policy.

RFIS will take all the steps reasonably necessary to ensure that your Organization Data is treated securely and in accordance with this Privacy Policy, and no transfer of your Organization Data will take place to an organization or a country unless there are adequate controls in place including the security of your Organization Data.

If RFIS is involved in a merger, acquisition or asset sale, your Organization Data may be transferred. We will provide notice before your Organization Data is transferred and becomes subject to a different Privacy Policy.

12. Disclosure for Law Enforcement. Under certain circumstances, RFIS may be required to disclose your Organization Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). Specifically, RFIS may disclose your Organization Data in the good faith belief that such action is necessary to (i) to comply with a legal obligation, (ii) to protect and defend the rights or property of RFIS, (iii) to prevent or investigate possible wrongdoing in connection with services provided by RFIS to you, (iv) to protect the personal safety of users of RFIS services or the public and (v) to protect against legal liability.

For information about the disclosure of Personal Data, please refer to the Boodle privacy policy.

13. Security of Organization Data. The security of your Organization Data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Organization Data, we cannot guarantee its absolute security.

For information about the security of Personal Data, please refer to the Boodle privacy policy.

Our Policy on “Do Not Track” Signals Under the California Online Protection Act (CALOPPA) is that RFIS does not support Do Not Track. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. Also, you can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Your Organization Data Protection Rights Under the General Data Protection Regulation (GDPR). If you are a resident of the European Economic Area (EEA), you have certain data protection rights. For information about the protection of your Personal Data, please refer to the Boodle privacy policy.

14. Analytics. We may use third party Service Providers to monitor and analyze the use of our service such as Google Analytics, which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our service. These data are shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

15. Payments. We may provide paid products and/or services. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI- DSS requirements help ensure the secure handling of payment information.

The RFIS website may contain links to other sites that are not operated by us. If you click a third- party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

16. Children’s Privacy. RFIS does not address anyone under the age of 18. For your Personal Data, any questions about information about personally identifiable information for anyone under 18 should refer to the Boodle privacy policy.

17. Changes to this Privacy Policy. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our website prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are therefore advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

18. Contact Us. If you have any questions about this Privacy Policy, please contact: [support@riskfreeitemshop.com](mailto:support@riskfreeitemshop.com).