

Privacy Policy

Effective Date: July 28, 2021

This Privacy Policy (“**Policy**”) describes the Personal Information collected by or on behalf of the Board of Church Extension of Disciples of Christ d/b/a Disciples Church Extension Fund (“**Disciples**,” “**we**,” “**us**,” or “**our**”) through the services we provide, our online website (www.disciplescef.org), and the mobile applications we provide (collectively, the “**Services**”), and how Personal Information is used, protected and shared. If you have questions or concerns about this Policy, please contact us as set forth below.

We may modify this Policy at any time. All changes will be effective immediately upon posting to our website. Material changes will be conspicuously posted on our website or otherwise communicated to you.

We Collect Data You Provide

Personal Information. You can visit our website without submitting data that personally identifies you (“**Personal Information**”). However, you will be required to provide Personal Information in order to request or sign up for an investment account or to submit a loan application, and to use certain other features of the Services. For example, you must provide Personal Information when you request or sign up for an online account, to submit a loan application, when making an investment, when submitting information requests, and when responding to communications from us. We will collect, use, and share all Personal Information pursuant to this Policy and applicable law.

Online Account. To request or create an online account for either investment or loan application purposes, you will need to provide us with your name, mailing address, and email address.

Investment Purchase Application and Transaction Information. We will collect all information you provide in the course of applying for an organization or individual investment purchase, including your Tax ID, Social Security number, driver’s license number, and birthdate (as applicable), as well as information about the particular investment. We will also collect all information you provide in the course of using the Services, including the information required by our online forms.

Loan Application Information. We will collect all information and documents you provide in the course of applying for a loan or line of credit, including financial statements, tax returns, pay statements, insurance information, and any Personal Information that you submit for purposes of allowing us to review your credit history.

Financial Information. Invested funds must be transferred by check or ACH. When transmitting funds through the Services, all payment information (*e.g.*, bank account numbers) is provided directly to our PCI-compliant third-party payment processor. If you submit payment via ACH, you will need to submit the name of your bank and your bank account number and routing number. Disciples stores this information in its accounting software to assist its payment processor with recurring payments. We will maintain records of the transactions you make.

E-Newsletters/Marketing Communications. If you sign up or otherwise opt in to receive our e-newsletter or other marketing communications, you will need to submit your name and e-mail address. You may opt out of receiving promotional emails from us at any time by following the unsubscribe instructions contained in the applicable email. We may use third-party email providers to deliver these communications to you.

Feedback. When you provide comments or feedback about our Services or the content on our website ("Feedback"), we will not treat that Feedback as confidential and we may use that Feedback for any purpose in our sole discretion so long as it does not personally identify you. Feedback will be used without attribution or compensation to you.

Data Automatically Collected

Cookies & Other Tracking Technologies.

What types of online tracking mechanisms do we use? We may use cookies, web beacons, pixel tags and other tracking technologies (collectively "**Cookies**") on our website.

What are cookies and web beacons / pixel tags? A cookie is a small text file that our website saves onto your computer or device when you use the website that provides us certain information about your activities. Cookies allow the website to remember your actions and preferences and recognize you or your browser, along with some information you provided. Web beacons / pixel tags are small graphics on a webpage that monitor your activity when viewing a webpage.

Why do we collect Cookies? We use Cookies to:

- make our website function properly;
- provide personalized experiences;
- tailor our interactions with you;
- help with our marketing efforts;
- provide us with valuable data and statistics about the usage and effectiveness of our website and to
- help us improve our Services.

What type of information do Cookies collect? The Cookies on our Site may collect information such as:

- IP addresses assigned to the computers and other devices you use;
- your internet service provider;
- device ID number;
- approximate geographic location;
- browser type;
- website pages visited;
- websites you access before and after visiting our website, and
- data related to how and when you use our website.

How long do Cookies last? A Cookie can either be a "session" Cookie or a "persistent" Cookie. Session Cookies exist only for so long as you are visiting the applicable website and are typically deleted when you exit your web browser. Persistent Cookies exist for a set period of time, for example, up to several months or years. Each time you visit a Site that has implemented a persistent Cookie, the persistent Cookie is renewed and that Cookie will remain active until its predetermined expiration date. You can manually delete persistent Cookies through your browser settings.

First and Third-party Cookies. Cookies may either be "first-party" or "third-party" Cookies. A first-party Cookie allows your web browser to talk to the actual website that you are visiting. A third-party Cookie allows your web browser to talk to a third-party website, such as the source of an ad that appears on the website you are visiting or a third-party analytics provider. We may not have control over how a third-party uses information collected through third-party Cookies.

How do you manage Cookies or opt-out? Most browsers automatically accept cookies. You can disable this function by changing your browser settings, but disabling cookies may impact your use and enjoyment of our website. Not all features or functions of our website may work properly if you disable Cookies. You cannot disable all Cookies, such as Cookies that are essential to the functioning of our website.

CALIFORNIA'S "DO-NOT-TRACK" REQUIREMENT. WE CURRENTLY DO NOT HONOR "DO NOT TRACK" REQUESTS.

Google Analytics. We use Google Analytics to collect and process information about your use of our website. Google sets cookies on your browser or device, and then your web browser will automatically send information to Google. Google uses this information to provide us with reports that we use to better understand and measure how users interact with our website.

To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data when you use our partners' sites or apps.](#)" You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

Online Behavioral Advertising. We use third parties and/or service providers to provide interest-based advertising services. These services may serve advertisements on our behalf that are customized based on predictions about your interests generated from your visits to websites over time and across different websites. The data collected may be associated with your Personal Information. These advertisements may appear on our website and on other websites, and may be sent to you via email.

We use Google Ads to serve ads across various websites. Google uses Cookies to collect data about your visits to our website to generate targeted advertisements to you on other websites that you visit. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google's collection or use of such data, visit [Google's Safety Center](#) and [Google's Ad Settings](#) and follow [Google's personalized ad opt-out instructions](#). Opting out will not affect your use of our website.

To change your preferences with respect to certain online ads or to obtain more information about ad networks and online behavioral advertising, visit [National Advertising Initiative Consumer opt-out page](#) or the [Digital Advertising Alliance Self-Regulatory Program](#). Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads. Opting-out of targeted advertising does not opt you out of all ads, just those targeted to you.

How We Use Personal Information. We use Personal Information for the following purposes:

As Stated or Agreed to at the Point of Collection. We may use Personal Information for the purposes stated or agreed-to (or as is obvious) at the point of collection. For example, we use Personal Information to provide the Services, to respond to your requests, to administer the Services, and to administer and communicate with you in connection with your account (including to process your investment transactions and to provide you with account statements).

Administration. We use Personal Information for administrative purposes, such as managing your accounts, facilitating transactions, to inform our business strategies, to understand the our website's demographics and user preferences, for evaluating applications, and managing profiles.

Management. We use Personal Information for management of our Services, such as troubleshooting problems, improving the content and functionality of the Services, statistical and other analyses of the Services, and to customize the Services to you and our users.

Advertising and Communications. We may use Personal Information to send you promotions, to notify you of new services, products or programs, to notify you of new features of our Services, to notify you of changes to our Terms or this Policy, and for other similar communications.

To Protect Our Rights. We may use Personal Information to protect our legal rights or interests, or those of other parties, including to bring a legal action against you or anyone who may be causing harm to us or our Services. We may also use Personal Information to seek business, financial or legal advice, and to respond to other legal requests.

Retention of Personal Information

We will keep Personal Information for the period necessary to fulfil the purposes described in this Policy, unless a longer retention period is permitted or required by law.

Disclosure of Personal Information

We do not sell, rent or lease Personal Information to any third party. We may share Personal Information with the following parties, in compliance with applicable laws:

Employees and Affiliates. We may share Personal Information with our employees and affiliates who have a need to know the information for our business purposes.

Third-Parties and/or Service Providers. We may share Personal Information with third parties and/or service providers that provide services for us. For example, we may share Personal Information with vendors to help us host and manage the Services, including our mobile application providers; provide identity verification services, provide accounting and customer management software; provide marketing services; improve the content and functionality of our website; perform data analysis and statistical analysis; troubleshoot problems with our website; and support or provide the security of our website.

Government Officials/Law Enforcement. We will cooperate with law enforcement and other governmental agencies, and may disclose Personal Information: (i) if we believe in good faith we are legally required to disclose that Personal Information, (ii) if we are advised to disclose Personal Information by our legal counsel, or (iii) when necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Disciples or any other party.

Professional Advisors. We may share Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors and business advisors, in their capacity as advisors to Disciples.

Business Transfers. In the event Disciples is acquired or is otherwise subject to a change of control, or in the event of a bankruptcy, receivership or other similar transaction, we may provide Personal Information to the subsequent owner(s).

Other. We may share Personal Information with third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

Where appropriate, we will limit sharing of your Personal Information in accordance with the choices you have provided us in responses to our GLBA Consumer Privacy Notice.

Use and Disclosure of Non-Personal Information.

Disciples may collect, use, share, transfer and otherwise process de-identified and aggregated information that it receives or creates for any purposes in its sole discretion, in compliance with applicable laws. Disciples is the sole and exclusive owner of such de-identified and aggregated information, including if Disciples de-identifies Personal Information so that it no longer considered Personal Information under applicable laws.

Children's Information.

Our Services are not directed at children under 13 years of age. We do not knowingly collect, use, or share Personal Information from children under 13. If a parent or legal guardian learns that their child provided us with Personal Information without his or her consent, please contact us and we will make commercially reasonable attempts to delete such Personal Information.

Data Security

We use commercially reasonable technical and organizational measures to help secure Personal Information against loss, misuse, and alteration appropriate to the type of Personal Information processed. If a breach of your Personal Information occurs, we will notify you of the breach if required under applicable law.

YOU UNDERSTAND THAT NO DATA TRANSMISSION OVER THE INTERNET OR DEVICE CAN BE GUARANTEED TO BE 100% SECURE. WHILE WE STRIVE TO PROTECT PERSONAL INFORMATION, WE DO NOT GUARANTEE THE SECURITY OF PERSONAL INFORMATION AND YOU PROVIDE PERSONAL INFORMATION AT YOUR OWN RISK.

Access from Outside the United States

If you access our website from outside the United States, please be aware that Personal Information may be transferred to, stored in, and processed in the United States. Certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by the in other jurisdictions.

Third-Party Websites

Our website may link to, or be linked to, websites not controlled by us. We are not responsible for third-parties' privacy policies or practices. This Policy does not apply to any third-party websites or to any data that you provide to third parties. You should read the privacy policy for each website that you visit.

Access & Update Your Personal Information

To access or update your Personal Information as it exists in our records, please visit any online account you have created or contact us using the information below.

California Residents

Pursuant to California Civil Code Section 1798.83, if you are a California resident, you have the right to obtain: (a) a list of all third parties to whom we may have disclosed your Personal Information within the

past year for direct marketing purposes, and (b) a description of the categories of Personal Information disclosed, by emailing us at invest@disciplescef.org.

Contact Us

If you have questions or concerns regarding this Policy, contact us at:

Board of Church Extension of Disciples of Christ d/b/a Disciples Church Extension Fund
1099 North Meridian Street, Suite 700
Indianapolis, IN 46204
(800) 274-1883
invest@disciplescef.org