

HELP

PRIVACY POLICY

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Welcome to HELP App (“App”)!

We value your privacy; therefore, we want you to know more about how we process your personal data.

1. INTRODUCTION.

Help Polis Inc. (“Help”, “we”, “us” or “our“) is committed to respect and protect your Personal information. Along with the Terms of Use, this Privacy Policy (“Policy”) explains to you what information is collected, how we use, process and protect it when you use or access our mobile app Help App (also referred to as the "Services", “App”), or when you connect or engage with us in any way.

Who are we?

Help Polis Inc., a public non-profit corporation registered in California with EIN Number 33-1523107, having its registered office at 1401 21ST ST, STE R SACRAMENTO, CA 95811. Help operates as a charitable fundraising platform.

Help Polis Inc. is the Data Controller responsible for the personal data in respect of Users that are subject to the EU General Data Protection Regulation (“GDPR”), Data Protection Act 2018 (“DPA”), California Consumer Privacy Act (“CCPA”).

Before you access, use, or submit any information through or in connection with the Services, please carefully review this Policy. Reading this Privacy Policy will help you understand your privacy rights and choices. If you do not agree with our Policies, please do not use our Services.

By using the App and providing your personal data, you agree to the terms outlined in this Privacy Policy. If you still have any questions or concerns, please contact us at legal@helpworld.app.

Please note that this Policy does not cover, and we are not responsible for the privacy practices of the participating nonprofit organizations that are located in the App and other contractors – their handling of data may be subject to their own Privacy Policies.

In this Privacy Policy you can find more detailed information on the **following matters**:

- Information we collect
- Use of Information
- Disclosure of Information
- Advertising, Analytics and Cookies
- Minors Data
- Privacy Rights
- Links to Other Websites (“Third-Party Links”)
- Data Transfer
- Additional Information for California Residents

- Additional Information for Individuals In EEA, Switzerland, And UK
- Contact Details

2. INFORMATION WE COLLECT.

We may collect information about you in several ways – when you provide information directly to us, when we collect information about you from other parties, and when we automatically collect information from your device.

Data you provide to us

We may collect information when you: register for an account at Help App, engage with interactive features in the App (e.g. post comments), donate to the participating nonprofit organizations and make recurring subscriptions, communicate with us, interact with us in other ways.

The information you provide may include:

- Personal data: name, email address, phone number, age and date of birth and any other information you choose to provide us (e.g. your profile picture).
- Other Information: preferences, in-app comments and interactions.
- Biometric Information or other documents: We may rely on third-party contractors such as SumSub to collect biometric information (such as ID, passport, etc.) for identity verification, regulatory compliance, and fraud prevention purposes. You can learn more about SumSub and read its Privacy Policy at <https://sumsub.com/privacy-notice-service/>.

Data We Collect from Other Parties

- Payment and transaction details: payment information when you transfer money to participating nonprofit organizations and set up a recurring donation subscription. We rely on third-party payment processors, such as Stripe, to handle financial transactions. These processors may collect personal data, including transactional information and details about devices that access their services through cookies and similar technologies. These payment processors act both as processors and as independent controllers for the information they may collect directly from you. You can learn more about Stripe and read its Privacy Policy at <https://stripe.com/privacy>.
- Our App integrates various third-party services, including Mapbox, AWS, Loops, Twilio, Sentry, and PostHog, to enhance your user experience and app functionality. These service providers may process and collect your personal data in accordance with their own Privacy Policies. We encourage you to review their respective Privacy Policies to understand how they may handle your data. Please note that we do not control or assume responsibility for their privacy practices. You can learn more about third-party services and read their Privacy Policies at:
Mapbox Privacy Policy: <https://www.mapbox.com/legal/privacy>
AWS Privacy Policy: https://aws.amazon.com/privacy/?nc1=h_ls
Loops Privacy Policy: <https://loops.so/privacy>
Twilio Privacy Policy: <https://www.twilio.com/en-us/legal/privacy>

Sentry Privacy Policy: <https://sentry.io/privacy/>

PostHog Privacy Policy: <https://posthog.com/privacy>

Data collected Passively or Automatically

When you open the App, we generate or collect the following information about you:

- User ID: a user ID that we will associate with you.
- Derived information: IP address to derive the approximate info about your device. This information is collected passively through various technologies and includes details such as the type of internet browser or mobile device you use, and inferred location data based on your IP address, identifying the place where you accessed the Services.
- Geolocation data: when you install the App, we request access to your device's geolocation data. If you grant permission, we may collect and use this data to enhance the Services, such as offering location-based features in the App. You can opt out of sharing your geolocation by adjusting your settings.
- Cookies, analytics and similar technologies: while the Help App does not use cookies to collect information, we do use product analytics services to enhance and improve our services. For more information, please, refer to section 5 of this Privacy Policy.

Until such time as Help obtains its own 501(c)(3) status, the Platform operates under the fiscal sponsorship of Players Philanthropy Fund (PPF), a nonprofit organization recognized by the IRS as tax-exempt under IRC §501(c)(3) For donor visibility and privacy policy information refer to ppf.org/pp. Donations processed through the App are legally made to the Fiscal Sponsor on behalf of Help. For donor visibility and privacy policy information refer to ppf.org/pp.

3. USE OF INFORMATION.

We may use your personal information for any lawful purpose, including the following:

- To provide you with our Services pursuant to our [Terms of Use](#).
- To operate and improve the Services by developing new products and features and for analytics purposes.
- To comply with applicable regulations and laws and maintain the security of our Services.
- To process transactions and fulfill your purchases.
- To respond to your enquiries and communicate about our Services.
- To verify your account and to detect, investigate, and prevent fraudulent transactions and other illegal activities.

Additional purposes will be communicated to you prior to the data collection or may require your consent.

We may also combine information collected from you through our Services with data obtained from other sources to create a more comprehensive understanding of your preferences.

4. DISCLOSURE OF INFORMATION.

We may share your personal data with third parties which provide a variety of operations to improve the services we provide and for other purposes mentioned in section 3 of the Policy.

We may share your personal information with:

- Service providers: including hosting services, email services, payment processors (acquiring services), customer support services, compliance providers (KYC and AML providers), and analytics services, to improve our services. We share data with these parties to ensure stable operation, enhance functionality, support user experience, and maintain compliance with applicable laws and standards.
- Affiliates: we may share Information with our current and future affiliates, meaning an entity that controls, is controlled by or is under common control with **Help Polis Inc.** We may share data, where doing so is necessary to facilitate the services and perform their functions and tasks. This includes the internal sharing of data between various Polis services, including both non-profit and for-profit components, in order to provide a seamless user experience across the ecosystem. Our affiliates may use the Information we share in a manner consistent with this Privacy Policy.
- Legal: We may share data when necessary or required by applicable laws or legal processes, such as in response to a court order, subpoena, or other legal requests from governmental and public authorities to fulfil national security or law enforcement obligations.
- Other users: We may provide your information (picture and name – unless the account is deleted) and information about your donations to all authorized users of the App if you choose to make your information publicly available in the App.

We may share your personal information with service providers, affiliates, and other third parties as described in this Policy. We do not sell your personal information as defined under the CCPA.

When we share your personal data with trusted third parties (data processors, joint controllers, or independent controllers) for specific purposes as described in this Privacy Policy.

We take reasonable steps to ensure that all third parties with whom we share your personal data maintain high standards of data protection and operate in compliance with applicable laws. Nevertheless, please note that we are not responsible for the privacy practices of the contractors – their handling of data is subject to their own Privacy Policies.

5. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES.

While the Help App itself does not use cookies to collect information, we integrate various third-party services, including Mapbox, AWS, Loops, Twilio, Sentry, and PostHog, to enhance your user experience and app functionality. We encourage you to review their respective Privacy Policies to understand how they may handle your data. Please, refer to section 2 of this Privacy Policy to know more about these services.

We use PostHog, a product analytics platform, to analyze how our Services are used and how you interact with our App. The insights we gain help us continuously improve your experience.

What data we collect via PostHog:

- Event Data (like button clicks, screen views etc.)
- User Information (like browser & device type, geolocation etc.)
- Session Metadata (like timestamp, session duration etc.)
- Technical Metadata (like IP address etc.)

PostHog can capture frontend events automatically using autocapture. Also, PostHog automatically attempts to prevent sensitive data capture. For more information regarding PostHog's privacy practices, please visit the [PostHog Privacy Policy](#).

6. MINORS DATA.

The Features of the Help App are intended solely for individuals who are at least 18 years old and possess the legal capacity to enter into binding agreements in their jurisdiction. By registering an account, you represent and warrant that you meet these requirements.

In compliance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect personal information from children under 13 without obtaining verifiable parental consent.

For Users in the European Economic Area (EEA):

If you are located in the EEA, the age at which a child can provide their own consent for data processing varies between 13 and 16 years, depending on the Member State. However, our Services are not intended for individuals under the age of 18. If we become aware that we have collected personal information from a child under 18, we will delete such information promptly.

For Users in California:

Following the California Consumer Privacy Act (CCPA), we adhere to the following consent requirements for minors:

Children Under 13: We do not sell the personal information of children under 13.

Children Ages 13 to 16: We do not sell the personal information of consumers we know to be at least 13 but less than 16.

If you are a parent or guardian and believe that your child under the age of 16 has provided us with personal information without your consent, please get in touch with us at ccpa@helpworld.app. We will take steps to delete such information promptly.

7. PRIVACY RIGHTS (Data Subjects' rights).

We retain your information for as long as it is necessary to fulfill the purposes for which it was collected and to support our legitimate business operations. However, we ensure that your information is retained only as permitted or required by applicable laws.

Regardless of your jurisdiction (with limits and certain conditions) you have the right to:

- know more about the data we hold about you;
- access data we hold about you;
- correct data we hold about you;
- opt out of “sales”, targeted advertising, or “sharing”;
- delete data we hold about you;
- restrict the processing of sensitive personal data or opt out of profiling for decisions with legal or similarly significant impacts. However, Help does not perform processing activities that trigger these opt out rights.

Please, be aware that even if you request the deletion of your information, we may still retain certain information when required or permitted by law.

We provide you with various options to manage how your information is collected, used, and shared:

- You may create an account in the App and verify, correct, update, or delete your information in the account sms@helpworld.app .
When you delete your account, we permanently erase all your personal data, including your name, email address, phone number, age, date of birth, and any other information you may have provided to us such as your profile picture. The only exception to this erasure is your donation history. While your donations will remain visible to other users for transparency purposes, they will no longer be attributed to you. Instead, they will appear under an "Anonymous User" profile. Your previous user profile will also be renamed to "Anonymous User," and all associated personal information will be removed. Although others may still view the amounts you donated and the list of your donations, none of your personal identifiers will be retained.
- You may opt out of sharing your geolocation data.
- You may opt in and opt out of receiving marketing communications
- You may opt out of web analytics specified in section 5. Please be aware that it may affect the functionality of the App.
- You may opt out of sales of your personal information, or the processing of your personal information for targeted advertising. Please be aware that we don't sell you data.
- We recognize that data privacy laws are evolving across various U.S. states, with some having enacted consumer data privacy laws that are currently in effect or will become effective in the near future. Depending on your state of residence,

you may have certain rights regarding your personal information. These rights may include, if applicable:

- The right to know what personal information we collect about you and how we use and share it.
- The right to access the personal information we have collected about you.
- The right to request the deletion of your personal information, subject to certain exceptions.
- The right to correct inaccuracies in your personal information.
- The right to opt out of the sale or sharing of your personal information (although we do not currently sell personal information).
- The right to limit the use and disclosure of sensitive personal information.
- The right to non-discrimination for exercising your privacy rights.

You can exercise these rights by emailing us at legal@helpworld.app. For CCPA-related inquiries, please contact us at ccpa@helpworld.app. You will not be discriminated against for exercising your rights. We are committed to responding to your request in accordance with applicable laws. Please note that these rights may vary based on your state of residence and the specific laws applicable to you.

8. LINKS TO OTHER WEBSITES (“Third-Party Links”).

Our App may include links to external websites that Help does not own or control (“Third-Party Sites”). This Policy does not apply to Third-Party Sites. We are not responsible for the processing of personal data, other Privacy Practices, or the content of these third-party privacy practices. We recommend contacting those sites directly for information about their Privacy Policies.

9. DATA TRANSFER.

HELP is based and is headquartered in the United States, however, some of our service providers and vendors may be located outside the United States. Thus, we may have operations and process your information in various countries, including the EEU and the UK. Switzerland. As a result, your information may be processed in jurisdictions that may not provide the same level of data protection as your home country. However, whenever we transfer your data abroad, we are aimed to provide a similar level of protection, implementing appropriate safeguards to ensure compliance with applicable data protection laws. For example, we may transfer your personal data to countries outside the European Economic Area (EEA). In such cases, we may rely on mechanisms such as the European Commission’s adequacy decisions, obtaining your consent, or executing Standard Contractual Clauses (SCCs) approved by the European Commission to transfer personal data, which contractually oblige recipients of your data to protect it following GDPR standards.

10. INFORMATION FOR CALIFORNIA RESIDENTS.

If you are located in California, this section applies to you. This section provides additional information required by the California Consumer Privacy Act (CCPA).

Here, we outline the personal information we have collected from California residents over the past 12 months. Under CCPA, "personal information" is information that identifies, relates to, or could reasonably be linked with you or your household.

Personal information we may collect in the App: identifiers (name, phone number, email address, unique identifiers like IP address), characteristics of protected classifications under state or federal law (age), commercial information (payment information), geolocation data, internet or other electronic network activity (information about your usage and interactions with the App), visual information (profile photo), other personal information or sensitive personal information you provide and inferences drawn from the above (product interests) and any other data mentioned in section 2 of the Policy.

Purposes for which we may use your information: to provide you with our Services pursuant to our Terms of Use, to improve the Services by developing new products and features, to comply with applicable regulations and laws and maintain the security of our Services, to respond to your enquiries and communicate about our Services, to operate, personalise, develop and improve the Services, including for analytics purposes, and for any other purposes specified in section 3.

Third parties with whom your data may be shared: companies that provide services to us, affiliates, other users of the App (if you consent) and government and legal entities for legal reasons and any other parties mentioned in section 4.

Help does not sell personal data and strictly complies with restrictions and prohibitions under CCPA.

California residents may have certain rights regarding their personal Information:

- The right to know the personal Information that HELP collects and how it is used and shared.
- The right to delete collected personal information with particular exceptions
- The right to opt out of the sale or sharing of information
- The right to non-discrimination for exercising the rights
- The right to correct inaccurate personal information
- The right to limit the use and disclosure of sensitive personal information

California's "Shine the Light" law (Civil Code Section § 1798.83) allows California residents to request information regarding the disclosure of their personal information to third parties for direct marketing purposes. California residents who use our App may request certain information about our disclosure of personal information to third parties for their direct marketing

purposes. To make such a request, please email ccpa@helpworld.app with "Shine the Light Request" in the subject line.

We may collect personal information directly from you when you provide it online, through electronic forms; automatically via analytics on our App; and from our service providers and vendors.

11. INFORMATION FOR INDIVIDUALS IN EEA, SWITZERLAND, AND UK.

If you are located in the European Economic Area, Switzerland, or the United Kingdom, this section applies to you. HELP is a data controller for personal data in accordance with this Privacy Policy.

What is Personal data?

Personal data is any information relating to an identified or identifiable natural person (data subject), such as a name, surname, identification number, IP address etc. In other words, personal data is any information about you that allows to identify you.

When you use our App, we may collect certain personal data as mentioned in section 2 of the Policy.

Accuracy and Retention of Personal Data

We take reasonable steps to ensure your personal Data is accurate with regard to the purposes for which it is used and kept only as long as necessary for the purposes for which it was collected. If HELP no longer needs the User's personal data, we will delete it.

Our legal grounds for processing your information may include your consent, contractual obligations, legal obligations and legitimate interest.

Specifically, your data will be:

- Processed lawfully, fairly, and transparently.
- Collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary for the purposes of processing.
- Accurate and updated as necessary.
- Retained in a form that permits identification only for as long as necessary for processing purposes. Data may be stored longer for archiving, research, or statistical purposes as permitted by applicable laws.
- Protected with appropriate security measures to guard against unauthorized or unlawful processing, and accidental loss, destruction, or damage.

The legal basis for processing of the personal data include:

- **Legitimate interest:** legitimate reason to process your personal data for a specific purpose, and we carefully evaluate that our interest outweighs any potential impact on your rights and freedoms, including risks to your privacy, for example, for fraud detection.
- **Contractual obligation:** when we need to process your personal data to comply with the contract between you and us, for example, for service provision
- **Legal obligations:** when we have to process your personal data to comply with legal requirements and laws applicable to us, for example, in case of a Law Enforcement Requests.
- **Consent:** when we request and you give us your consent to process your data for specific purposes, for example, for your photo sharing or marketing emails.

User's Rights

Under applicable laws, you have the following rights:

- **Right of Access:** the right to ensure if your personal Data is being processed, to be informed of and to access the personal data we process regarding you.
- **Right to Rectification:** the right to request corrections or updates to your personal Data if it is inaccurate or incomplete
- **Right to erasure (right to be forgotten):** the right to delete your personal Data under certain conditions. Please send a request to the e-mail legal@helpworld.app.
- **Right to Restriction of Processing:** the right to limit the processing of all or parts of your personal data under specific circumstances.
- **Right to be informed about any rectification or erasure of personal data or about the imposition of the restriction on processing**
- **Right to Data Portability:** the right to receive a copy of your personal Data which you have provided to us in a structured, commonly used, and machine-readable format (electronically readable), and to forward it to another controller.
- **Right to Object:** the right to object to processing based on public and legitimate interests or for direct marketing.
- **Automated Decision-Making:** the right not to be subject to decisions based solely on automated processing without any human involvement unless necessary for a contract between you and HELP, the decision is authorized by law, or the decision is based on your explicit consent.
- **Right to complain:** You may lodge a complaint if your rights have been violated.
- **Right to withdraw consent:** If we process your personal information based on your consent (or explicit consent) as a legal basis for processing, you have the right to revoke that consent at any time.

We do not sell your personal data. European residents have the right to file a complaint with the local data protection authority if you believe we have not adhered to applicable data protection laws.

Also, to exercise your rights, please contact us by email at legal@helpworld.app.

12. CONTACT DETAILS.

We may update this Privacy Policy from time to time. Changes will be posted on this page, and users are encouraged to review it periodically. If any changes are made, the revision date at the top of the Policy will be updated accordingly.

If you have any questions, comments, or concerns regarding this Privacy Policy about this Privacy Policy, please contact Help by email at legal@helpworld.app .

For CCPA-related inquiries, please contact our dedicated privacy team at ccpa@helpworld.app
For all other inquiries, please contact our dedicated privacy team at legal@helpworld.app

Per Article 27 of the GDPR and Article 27 of the UK Data Privacy Act, we have appointed a EEA Representative and a UK Representative to act as our data protection agents.

EEA: Sonja Marija Sherman

UK: Sonja Marija Sherman