

# Privacy Policy

**Effective date: 23 December 2025**

Thank you for visiting this Site, which is owned and operated by ReEnFoCo, Inc. This Privacy Policy governs your use of this Site and applies to all users of this Site. Your privacy is very important to us. Our Privacy Policy explains how we collect, use, and protect your personal information when you visit our website. This document details the types of information we gather, why we collect it, and how we keep it secure. It also informs you of your rights regarding your data and how you can manage your privacy preferences. We are committed to safeguarding your personal information and ensuring transparency in how we handle your data.

## General Policy

This section introduces this Privacy Policy and highlights certain aspects.

ReEnFoCo, Inc. (“ReEnFoCo”) provides this Privacy Policy to let you know our policies and procedures regarding the collection, use and disclosure of information through reenfoco.org (the “Site”), and any other Sites, online Services, features, applications, or widgets that are owned or controlled by ReEnFoCo, Inc. and that post a link to this Privacy Policy, as well as any information ReEnFoCo, Inc. collects offline relating to the Service. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your Personally Identifiable Information.

ReEnFoCo, Inc. collects information on behalf of, and about our Clients and Site Users. ReEnFoCo, Inc. gathers information to help us protect you, maintain the security of our Site, and for the purposes described in this Privacy Policy. Protecting your Personally Identifiable Information is a responsibility ReEnFoCo, Inc. takes very seriously. ReEnFoCo, Inc. is committed to safeguarding your privacy. We want to help our Clients and Users understand what data we collect, how we use the data we collect, who we share this data with, and how we secure and protect this data. The purpose of this document is to share these details with our customers, Site Users, and anyone else interested in these details.

A few highlights of our commitment to your privacy and the responsible management of your information incorporated in this Privacy Policy:

- ReEnFoCo, Inc. does not sell or rent your information. Period.
- ReEnFoCo, Inc. collects the very minimum information possible to enable the services you request.
- ReEnFoCo, Inc. limits sharing any information to the maximum extent possible consistent with providing you with the services you request or other legal requirements.
- Any information collected by ReEnFoCo, Inc. is stored in secure servers using up-to-date commercial practices, including in transit and at rest encryption.

We hope you find this Privacy Policy easy to read and as concise as possible given all we disclose. We appreciate any feedback you may have to improve this Privacy Policy and invite you to share that feedback at [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Your Consent

This section confirms that by accessing the Site or Services you agree to the terms of this Privacy Policy.

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By accessing the Site or using the Service, you consent to the collection, use, disclosure, and transfer of your information as described in this Privacy Policy (and any Privacy Notices that apply to you). Please note that certain features or services referenced in this Privacy Policy may not be offered on the Service at all times. Please also review our Terms of Service, which govern your use of this Site or the Service. If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this Site. If you have questions about this Policy, or any Privacy Notice, please contact us using the information provided at the end of this policy.

## Definitions

This section defines key terms used in this Privacy Policy.

"Site" means content available at the reenfoco.org domain and other Internet sites operated by ReEnFoCo, Inc. on which this Privacy Policy is posted.

"Service" means a feature or capability ReEnFoCo, Inc. offers, including the Site.

"You" or "your" or "User" or "Visitor" means the user of this Site, including your authorized representative.

The terms "ReEnFoCo, Inc.", "we", "us", and "our" refer to ReEnFoCo, Inc.

The term "Personally Identifiable Information", or similar term, means information such as your name, address, telephone or cellular number, or related information that can identify a person as an individual or provides indicia of personhood.

The term "Non-Personally Identifiable Information" or similar term means information that does not identify a person as an individual or provide indicia of personhood. This information may include previously Personally Identifiable Information that has been changed or transformed, including using hashing, to ensure that the information should not be able to identify you individually. For example, we may render Personally Identifiable Information, e.g., an e-mail address, into a form of Non-Personally Identifiable Information using a mathematical process to convert information into a code. The code does not specifically identify the person, but the code may be used to connect the activities and interests of a person.

The term "Content" refers to all software and code comprising or used to operate this Site, and all text, photographs, images, illustrations, graphics, sound recordings, video and audio-video clips, and other materials available on this Site, including User-Generated Content and Feedback.

The term "User-Generated Content" means all text, photographs, images, illustrations, graphics, sounds, video and audio-video clips, and other content you post using functionality on this Site that allows you to post that content, communicate with other users, or otherwise engage in social networking activities and that does not constitute "Feedback."

The term "Feedback" refers to all text, photographs, images, illustrations, graphics, sounds, video and audio-video clips, and other content you post on or through this Site that is specifically about how we can improve this Site and the products and services we make available through this Site.

The term "Cookies" refers to a small data file that is transferred to your computer's hard disk for record-keeping purposes. ReEnFoCo, Inc. may transfer to your computer or similar device

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persistent cookies and session ID cookies. Persistent cookies remain on your computer or similar device and may serve several functions, including: saving registration information for future logins to the Site or Service; and to track your compliance with ReEnFoCo, Inc. Terms of Use. Session ID cookies expire at the end of your browser session and temporarily enable certain features and functions of the Site. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the Sites you visit. If you do not accept cookies, however, you may not be able to use all functionality of the Service. Cookies will not reveal any Personally Identifiable Information about you to others.

The term “Web Beacons” and/or “tracking tags” are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or e-mail messages you receive. Web beacons or similar technologies may be used for several purposes, including, without limitation, to count visitors to our Service, to monitor how ReEnFoCo, Inc. Users navigate the Service, to count how many sent e-mails were actually opened, or to count how many particular articles or links were actually viewed.

The term “Embedded Scripts” is a programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Service.

The term “including” means “including, but not limited to.”

## We Use Information We Are Provided or Collect

This section confirms that information ReEnFoCo, Inc. is provided or collected is used for ReEnFoCo, Inc.’s business purposes.

ReEnFoCo, Inc. uses information to facilitate the management of the business, including providing you with requested services. ReEnFoCo, Inc. collects and uses your Personally Identifiable Information and Non-Personally Identifiable Information for several reasons, including, but not limited to:

- Site management, including: identifying and resolving system performance issues with ReEnFoCo, Inc. Sites, improving technical assistance, improving search engine placement, improving Site navigation and page effectiveness, and performing analytics;
- Marketing, including: administering and developing our business relationship with you and, if applicable, the corporation or other legal entity you represent offering solutions that match your interests, tailoring content we display to you on ReEnFoCo, Inc. Sites, following up on requests you initiate, tailoring advertising displayed to you on third-party Sites, gathering information from outside sources and displaying survey results, sharing marketing or promotional materials on behalf of ReEnFoCo, Inc. or Third Parties;
- Security, including: maintaining a secure session, authenticating your computer, detecting fraudulent use, and verifying transactions;
- Customer Service, including: providing and improving services we provide you, addressing your inquiries, verifying the information you provide is valid, and for compliance and internal business purposes;
- General Communication, including: contacting you for administrative reasons, ReEnFoCo, Inc. newsletters and updates, and other information that may be of interest to you. If you

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decide at any time that you no longer wish to receive such communications from us, please contact us at [hola@reenfoco.org](mailto:hola@reenfoco.org);

- Legal or Law Enforcement Requirements, including: enforcing and complying with the law, supporting an investigation, protecting the property and rights of ReEnFoCo, Inc. or a third-party, protecting the safety of the public or any person, preventing or stopping activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity;
- For the purposes disclosed at the time you provide your information, with your consent, and as further described in this Privacy Policy.

## **We never lease, rent or sell your Personally Identifiable Information.**

In some cases, we may render Personally Identifiable Information (generally, e-mail address) into a form of Non-Personally Identifiable Information referred to in this Privacy Policy as “Hashed Information.” This is typically accomplished using a mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify you directly, but it may be used to connect your activity and interests. We may also combine information we collect from you from the Site, or through any service ReEnFoCo, Inc. provides, including offline.

Certain Non-Personally Identifiable Information would be considered a part of your Personally Identifiable Information if it were combined with other identifiers in a way that enables you to be identified (for example, combining information with your name). But the same pieces of information are considered Non-Personally Identifiable Information when they are taken alone or combined only with other Non-Personally Identifiable Information (for example, your viewing preferences). We may combine your Personally Identifiable Information with Non-Personally Identifiable Information, but ReEnFoCo, Inc. will treat the combined information as Personally Identifiable Information.

Unless you request that we delete certain information, we retain the information we collect for as long as needed for our business and legal purposes.

We also use analytics software to allow us to better understand the functionality of the Site on your mobile device. This software may record information such as how often you use the Site, aggregated usage, and performance data. We do not link the information we obtain from the analytics software to any of your Personally Identifiable Information.

We share this data programmatically with other third-party services to improve services. None of our third-party service providers may ever use your data for their own purposes without our explicit consent or notice to us. ReEnFoCo, Inc. may share your information with law enforcement agencies if required by a court of competent jurisdiction. If required by law and depending on the circumstances, we may or may not notify you if we share your information with law enforcement. ReEnFoCo, Inc. may also share your information with a third-party under order from a court of competent jurisdiction related to a lawsuit or investigation. We evaluate these requests on a case-by-case basis and, if required by law and depending on the circumstances, we may or may not notify you if this happens. We may use your information to contact you concerning a dispute related to your account, or for verification purposes to make sure no one else is accessing your account.

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## Information Sharing and Disclosure

This section describes circumstances when ReEnFoCo, Inc. may share and disclose your information.

We may share aggregated Non-Personally Identifiable Information and we may otherwise disclose Non-Personally Identifiable Information (including, without limitation, hashed information) to Third Parties. We do not share your Personally Identifiable Information with Third Parties for the marketing purposes of Third Parties.

Other than as set forth herein, we will not disclose your Personally Identifiable Information to Third Parties without your written consent (which consent may be obtained electronically, such as by e-mail), unless we reasonably believe the disclosure is essential to the conduct of the company's business or to provide services to you, including but not limited to where such disclosure is required by law, or if we believe such action is necessary in order to: (1) conform to the requirements of the law or comply with legal process served upon us; (2) protect or defend our legal rights or property, this Web site, or our users; (3) investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of the terms and conditions for using this Web site; or (4) resolve customer disputes or inquiries.

We may also share the information we have collected about you, including Personally Identifiable Information, as disclosed at the time you provide your information, with your consent, as otherwise described in this Privacy Policy, or in the following circumstances:

- **Service Providers:** We may employ third-party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services (e.g., without limitation, accounting and booking services, database management, web analytics and online advertising, payment processing, fraud detection and improvement of ReEnFoCo, Inc.'s features) or to assist us in analyzing how our Service is used. These Third Parties may have access to your Personally Identifiable Information in order to perform these tasks on our behalf.
- **You Request We Share Your Information:** You may be presented with an opportunity to receive information and/or marketing offers from one or more Third Parties. If you agree at that time to have your Personally Identifiable Information shared, your Personally Identifiable Information will be disclosed to that third-party (or parties) and will be subject to the privacy policy and practices of that third-party. We are not responsible for the privacy policies and practices of Third Parties, and, if you later decide that you no longer want to receive communications from a third-party, you will need to contact that third-party directly. You also may request, sometimes through your use of an SNS or similar interactive feature or third-party application, that we share information about you with a third-party and we will typically do so under those circumstances.
- **Legal and Investigative Purposes:** ReEnFoCo, Inc. will share information with government agencies as required by law. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, including but not limited to: subpoenas at the request of governmental authorities or other Third Parties conducting an investigation; protect the property and rights of ReEnFoCo, Inc. or a third-

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party; protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.

- Internal and Business Transactions: ReEnFoCo, Inc. may share information, including Personally Identifiable Information, with a parent company, subsidiaries, and affiliates, primarily for business and operational purposes. We may transfer or otherwise share some or all of our assets, including your Personally Identifiable Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy. You will be notified via e-mail and/or a prominent notice on our Site of any change in ownership or use of your Personally Identifiable Information, as well as any choices you may have regarding your Personally Identifiable Information.
- Sweepstakes, Contests and Promotions: We may offer sweepstakes, contests, and other promotions (any, a "Promotion") that may require registration. By participating in a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except when prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness or other indicia of personhood in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, your Personally Identifiable Information may be disclosed to Third Parties or the public in connection with the administration of such Promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the Promotion's official rules, such as on a winner's list.

## Information You Provide

This section covers what information you may provide ReEnFoCo, Inc. that will be retained and used.

ReEnFoCo, Inc. will only collect Personally Identifiable Information from you if you voluntarily provide the information, e.g., inquiring about ReEnFoCo, Inc.'s Services. ReEnFoCo, Inc. is the administrator of this Site and the only organization that manages the information collected on this Site. ReEnFoCo, Inc. does not lease, rent or sell information obtained through this Site. While visiting the Site or using our Services, whether as a Client or Site visitor, we may collect information that identifies you as an individual and could be used to contact or identify you. When you visit or use our Site, ReEnFoCo, Inc. may offer you the option to provide your Personally Identifiable Information, which may include:

- name;
- mailing address;
- telephone numbers, including a mobile telephone number capable of receiving SMS; and
- primary and secondary e-mail addresses.
- We may collect and hold the Personally Identifiable Information you provide. When reasonably required for our ordinary business purposes, we may also offer you the option to share information related to:
- Identity Verification, such as your date of birth or taxpayer identification number, to validate your identity as may be required by law. We may request documents to verify this information, such as a copy of your government-issued identification or photo or a billing statement.

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- Payment Information, such as billing address and payment card information.
- Non-Personally Identifiable Information and Usernames, such as zip code, demographic data, information regarding your use of the Service, and general data we consider Non-Personally Identifiable Information. We consider usernames, to the extent created and used, to be Non-Personally Identifiable Information.
- Other information as required to provide you with the requested services.

If you provide a mobile telephone number capable of receiving SMS, before contacting you via SMS, you will be asked for your consent to receiving further SMS messaging. By replying "REGISTRO", "SUSCRIPCIÓN", "REGISTER" or "SUBSCRIBE", you give your consent to receive messages via SMS to facilitate SMS communications with ReEnFoCo, Inc. directly related to the ReEnFoCo, Inc.'s initiatives. You can withdraw your consent at any time by replying "PARA", "CANCELA", "STOP", or "CANCEL".

## Information We Collect Automatically

This section covers what information you do not provide that ReEnFoCo, Inc. may collect, retain and use.

You do not need to provide any Personally Identifiable Information to visit public sections of this Site. We and our third-party service providers, including analytics and third-party content providers, may automatically collect certain information from you whenever you access or interact with the Site. When you visit or use our Site or Service, ReEnFoCo, Inc. may collect other information, including usage information, that you may not provide, but we use for our business purposes, which may include:

- Previous URL or Site you visited;
- Internet Protocol ("IP") addresses;
- Site navigation, pages you visited, time you spent on pages;
- Log files;
- Feedback, polls and surveys on our site;
- Postings on our site;
- Marketing Cookies and devices;
- Device Identifiers, including perhaps the type of device and the device's operating system version;
- Contact Information;
- Social Media information;
- Biometric information; and
- Geolocation information.

The technology used to collect information automatically from Users may include the following: cookies; web beacons; embedded scripts; etc. In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tracking tags) that collect similar information for security and fraud detection purposes and we may use Third Parties to perform these services on our behalf. We may also use Device Identifiers to identify ReEnFoCo, Inc. Users, and may do so in cooperation with Third Parties at our discretion.

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Our Services may change over time and we may introduce new features that may collect new or different types of information.

## Cookies and similar technologies

This section establishes how ReEnFoCo, Inc. uses cookies and related technology.

In accordance with applicable law, ReEnFoCo, Inc. and its partners, affiliates and other third-party service providers may use cookies, web beacons, pixels, local shared objects, embedded scripts and other similar technologies, to recognize your visit, collect information and track your interactions with our Site or Services. We will refer to the collective suite of tracking and reporting technologies as “Cookies”. We may combine Usage Data collected from Cookies with that of other customers to improve your and other customers’ experience. You have control over some of the usage data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings. We may use Cookies and other technologies to collect information and support certain features of this Site, for example, we may use these technologies to:

- Collect information about the ways visitors use the Site, including pages visited, links used, and time spent on each page;
- Enable features and functionality of the Site, including saving logon information already in our database to allow for a smoother User experience or to saving settings established on a prior visit;
- Enable a personalized experience when a User visits the Site; and
- Improve our marketing efforts, including through the use of targeted advertising.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to Personally Identifiable Information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

We may contract with companies to distribute e-mails on ReEnFoCo, Inc.'s behalf, perform analytics, and to deliver online advertisements on our Site, on other Sites and in other applications. We use this information to learn which online advertisements were effective, to help us analyze our Site, and the effectiveness of our marketing. These companies may use third-party cookies, or other capabilities such as embedded Site scripting, pixels or web beacons to collect anonymous information about your online behaviors when you visit our Site and across nonaffiliated Sites. ReEnFoCo, Inc. has no control over the cookie policy of Third-Party Sites and ReEnFoCo, Inc. has no responsibility to you for the cookie policy for any Third-Party Site.

## Data Analytics

This section describes how ReEnFoCo, Inc. manages aggregated data when conducting data analysis.

We may collect and aggregate data on how visitors use the Site at reenfoco.org. Some of the data may be associated with your Personally Identifiable Information. We may use a variety of third-party services to help us collect and analyze this data to evaluate the effectiveness for long-term

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use, or to gather information about a very specific question we have. If you ever have any questions about which third-party services we are currently using, please contact us at [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Third-party Analytics Service Providers and Ad Servers

This section covers ReEnFoCo, Inc.'s relationship with data analytics and advertisement service providers.

ReEnFoCo, Inc. may contract with network advertisers, ad agencies, analytics service providers and other vendors. These Third Parties provide us with information regarding traffic on the Service, including: reporting pages viewed and the actions taken when visiting the Service; serving our advertisements on other Sites, within mobile apps and elsewhere online; and providing us with information regarding the use of the Service and the effectiveness of our advertisements. Our service providers may collect certain information about your visits to and activity on the Service as well as other Sites or services, they may create, set and access their own tracking technologies on your device (including cookies and web beacons), and may use that information to show you targeted advertisements. Some of these Third Parties may collect Personally Identifiable Information when you visit the Service or other online Sites and services. We may also share certain Non-Personally Identifiable Information with these parties, including hashed Information, in connection with the services they provide to us.

Some of these third-party service providers are members of the Network Advertising Initiative ("NAI") or the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising. Visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp), for information regarding targeted advertising and the opt-out procedures of NAI members. Visit <http://www.aboutads.info/choices/>, for information regarding targeted advertising and offers an "opt-out" by participating companies in the DAA Self-Regulatory Program. You may also "opt-out" by going to <http://preferences-mgr.truste.com/> or if located in the European Union <http://www.youronlinechoices.eu/>. Opting out through these mechanisms does not opt you out of being served advertising, and you may continue to receive generic ads while online.

ReEnFoCo, Inc. will not receive your phone number, email address nor any other contact information you provide directly to ReEnFoCo, Inc.

## User Profiles

This section discloses how you can manage your Profile.

You may have the opportunity to create a "Profile", which consists of information about you, and may include Personally Identifiable Information, photographs and other information, including your username. The information in your Profile may be visible to all ReEnFoCo, Inc. Users and the public subject to the privacy choices you make within your ReEnFoCo, Inc. Profile. You may edit certain information in your Profile and may choose to limit who is able to view certain content you post to your Profile. Clients and Agencies of associated individual users or companies may also have the opportunity to create an organization Profile. If, in any case, you believe that an unauthorized profile has been created, you can request the Profile be removed by contacting us at [hola@reenfoco.org](mailto:hola@reenfoco.org).

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## Community Forums

This section describes how User Generated Content is managed and what expectations you should have.

You may have the opportunity to participate and post content publicly in forums, on blogs, through interactive features and through other communication mechanisms intended for public use, collectively referred to as "Community Forums". You may choose, through such features or otherwise, to submit or post questions, comments, or other content, collectively referred to as User Generated Content ("UGC"). In this Privacy Policy, UGC refers to content that you post using the social networking tools we make available to you and that does not constitute "Feedback". Any Personally Identifiable Information contained in UGC can be read, collected, or used by others. Anything you post to a Community Forum is public and others will have access to your UGC and may use it or share it with Third Parties. In addition, we may use UGC you submit for advertising campaigns and other promotions. Certain information, such as your name and Profile may be publicly displayed on the Site along with your User Generated Content. We may or may not use your name in connection with such use, and we may or may not seek your consent before using the content for such purposes. Therefore, you should have no expectation of privacy with respect to UGC you submit on or through this Site. If you choose to voluntarily disclose Personally Identifiable Information in your UGC or use Community Forums to link to your Profile, that information will be considered public information and the protections of this Privacy Policy will not apply. Your use of Community Forums is subject to the ReEnFoCo, Inc.'s Terms of Service.

To request removal of your Personally Identifiable Information from our blog or community forum, contact us at [hola@reenfoco.org](mailto:hola@reenfoco.org). In some cases, we may not be able to remove your Personally Identifiable Information, in which case we will let you know if we are unable to do so and why.

## Testimonials

This section discloses how ReEnFoCo, Inc. will handle testimonials.

We display personal testimonials of customers on our Service, in addition to other endorsements. With your consent, we may post your testimonial along with a representation of your name. If you wish to update or delete your testimonial, you can contact us at [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Communication with your Friends and Referral Programs

This section discloses how ReEnFoCo, Inc. manages information provided as part of a Referral Program.

ReEnFoCo, Inc. may allow you to send information about ReEnFoCo, Inc. to your friends via e-mail, telephonically or text message. Depending on which means you use to share information, we will use your friend's contact information to send the requested ReEnFoCo, Inc.-related information and your contact information will be used to copy you on the message to your friend or to send the message on your behalf. ReEnFoCo, Inc. stores your friend's information for the sole purpose of sending this one-time communication and tracking the success of our program. On occasion, we may ask for your friend's name, telephone number and/or e-mail address to facilitate the service, for example, when we offer a Referral Program or Promotion. We will manage this information as Personally Identifiable information. Your friend may contact us at [hola@reenfoco.org](mailto:hola@reenfoco.org) to request that we remove this information from our database.

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## Feedback and Surveys

This section discloses that ReEnFoCo, Inc. uses information acquired through Feedback and Surveys.

We may collect feedback from ReEnFoCo, Inc.'s Users about their experience of our Service. Please note that any feedback you provide via the Service is public information.

Occasionally, we send out surveys intended to help us better understand how you use our services and how we can improve them. We never lease, rent or sell the information collected through these surveys. ReEnFoCo, Inc. may use a third-party service to facilitate sending and collection of customer satisfaction surveys. The data collected by the third-party service is only used by ReEnFoCo, Inc., and not shared with any other Third Parties.

## How We Respond to Do Not Track Signals

This section discloses that ReEnFoCo, Inc. does not change information collection due to a "Do Not Track" signal.

Your browser setting may allow you to automatically transmit a "Do Not Track" (DNT) signal to Sites and online service you visit. ReEnFoCo, Inc.'s Site is not currently configured to respond to browsers' "Do Not Track" signals and consequently does not alter its data collection practices when it receives a "Do Not Track" signal from a User's browser. We currently do not make any guarantee that we will honor DNT signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

## Links to Third-Party Websites

This section confirms that ReEnFoCo, Inc. does not control Third-Party Site that are linked from this Site.

This Site may provide links to other Sites operated by Third Parties. ReEnFoCo, Inc. has no control over third-party Sites. ReEnFoCo, Inc. does not control the privacy or security practices of Third Parties, or the locations where they process data. ReEnFoCo, Inc. is not responsible for the availability of those Sites and does not endorse, accept responsibility or accept liability for any content, advertising, services, products, or other materials on or available from such Sites. ReEnFoCo, Inc. makes no warranties or representations regarding these Sites or the products or services offered on them. ReEnFoCo, Inc. shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with the use of or reliance on any content, advertising, services, products, or other materials on or available from such Sites. ReEnFoCo, Inc.'s Terms of Use and Privacy Policy do not apply to your use of third-party Sites; your use of such Sites is subject to the terms and policies of the owner of such Sites. You should read the terms of use, privacy and security policies of the other sites, as their practices may differ from ours.

To provide you with services offered on the Web site, or to complete transactions or requests you initiate on the Web site, we may transfer you to outside services provided by third-party operators. In certain instances, the third-party content may be "framed" in such a way that it appears that you are still on ReEnFoCo, Inc.'s Web site. In such cases, we will have agreements with those Third Parties whose Web sites you may be transferred to, under which the Third Parties agree to maintain the confidentiality of your Personally Identifiable Information and to use it only to help us serve you.

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The fact that we link to a Site is not an endorsement, authorization or representation of our affiliation with that third-party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party Sites. These other Sites may place their own cookies or other files on your computer, collect data or solicit Personally Identifiable Information from you.

## Information Received from Third Parties

This section discloses how ReEnFoCo, Inc. manages information received from Third Parties.

We also may receive information about you from Third Parties. For example, we may supplement the information we collect with outside records or Third Parties may provide information in connection with a payment processing agreement or at your request (such as if you choose to sign in with a third-party service). If we combine the information we receive from others with information we collect through the Service, we will treat the combined information as described in this Privacy Policy.

## Social Networking Services

This section discloses how ReEnFoCo, Inc. uses information acquired through Social Networks.

ReEnFoCo, Inc. uses social media information so we can improve our Site and Service and provide you with more personalized offers and experiences. Each Social Networking Service (“SNS”) provides and shares different types of information. The information we collect from and through a SNS may depend on the privacy settings you have set with the SNS. We may also use your contact information, such as your e-mail address, to obtain your publicly available social media information from Third Parties. ReEnFoCo, Inc. will be able to collect only the information that is made publicly available based on your SNS privacy settings, not your social account password or any non-public information. The Personally Identifiable Information an SNS has about you is obtained by the SNS independent of our Service, and ReEnFoCo, Inc. is not responsible for it.

ReEnFoCo, Inc. may permit additional interactions between you and a third-party SNS Site, SNS service, or other SNS content provider, such as enabling you to “like” or share ReEnFoCo, Inc. content with a third-party SNS. If you choose to “like” or share content, or to otherwise share information from or via our Site or Service with a third-party site or service, that information may be publicly displayed, and the third-party may have access to information about you and your use of our Service (and we may have access to information about you from that third-party). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Your interactions with Third Parties SNS services or similar features are governed by the respective privacy policies of those Third Parties. Your relationship with any SNS is governed solely by your agreement(s) with such SNS. You represent that you are entitled to use your SNS account for the purposes described herein without breach by you of any of the terms and conditions that govern the SNS, and without obligating ReEnFoCo, Inc. to pay any fees or making ReEnFoCo, Inc. subject to any usage limitations imposed by such SNS.

## Your Choices and Opting Out

This section discloses the process you can use to opt out of communication from ReEnFoCo, Inc.

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Users may update their choices regarding the types of communications you receive from us through your online account. You also may opt-out of receiving marketing e-mails from us by following the opt-out instructions provided in those e-mails. Please note that we reserve the right to send you certain communications relating to your account or use of the Service (for example, administrative and service announcements) via e-mail and other means and this communication may be unaffected if you opt-out from receiving marketing communications.

You may opt-out of receiving text messages by replying "CANCELAR", "ANCELA", "STOP" or "CANCEL" to any text message received. Users who access the Site or Service by using an ReEnFoCo, Inc. mobile application may, with permission, receive push notifications. Similarly, Users who access the Site or Service by using certain desktop browsers may, with permission, receive push notifications. Notification preferences can be modified in the settings menu for the mobile application or the applicable browser.

## Changing Your Information or Closing Your Account

This section discloses how to change information ReEnFoCo, Inc. possesses and to close any account you may have.

Upon request, ReEnFoCo, Inc. will provide you with information about whether we hold any of your Personally Identifiable Information. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. You may access, correct, or request deletion of your Personally Identifiable Information by making updates to that information or by contacting ReEnFoCo, Inc. If you request to access all Personally Identifiable Information you've submitted, we will respond to your request to access it within 30 days. If you completely delete all such information, then your account may become deactivated, and we may no longer be able to provide you with Service. We will use commercially reasonable efforts to honor your request; however, certain information may actively persist on the Service, including messages you posted to the Service. In addition, your Personally Identifiable Information may remain in our archives and information you update or delete, or information within a closed account, may persist internally or for our administrative purposes. It is not always possible to completely remove or delete information from our databases. In addition, we typically will not remove information you posted publicly through or on the Service. Neither you nor ReEnFoCo, Inc. can delete all copies of information that has been previously shared with other Third Parties.

## Data Retention

This section discloses that ReEnFoCo, Inc. may retain your information for various reasons.

In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and ReEnFoCo, Inc.'s records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

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## Security

This section describes the measure ReEnFoCo, Inc. takes to keep your Personally Identifiable Information secure.

ReEnFoCo, Inc. takes commercially reasonable steps to help protect and secure the information it collects from and stores about Users and limits access to that information to those with a business reason to know such information. Access to nonpublic Personally Identifiable Information is limited, through password protection devices and physical safeguards, to authorized employees or contractors as necessary to perform or provide the business service offered and to allow employees or contractors to perform their duties for ReEnFoCo, Inc.. ReEnFoCo, Inc. protects your Personally Identifiable Information from unauthorized access and uses security measures that comply with federal law. To protect nonpublic Personally Identifiable Information security measures include: computer safeguards; secured files; and security devices, such as firewalls, security patches and anti-virus programs. All access to the Site is encrypted using industry-standard transport layer security technology (TLS). When you enter sensitive information (such as an address), we encrypt the transmission of that information using secure socket layer technology (SSL). We also use HTTP strict transport security to add an additional layer of protection for our ReEnFoCo, Inc. Users.

We provide reasonable and appropriate security measures in connection with securing Personally Identifiable Information we collect, including but not limited to:

- Periodic and regular reviews of our security procedures and updates to our security practices to implement accepted methods to protect your Personally Identifiable Information;
- Compliance with applicable laws and security standards;
- Securely transmitting your sensitive Personally Identifiable Information; and
- Training our staff and requiring our staff to safeguard your data.

This Site has security measures in place; however, ReEnFoCo, Inc. does not represent, warrant or guarantee that Personally Identifiable Information will be protected against unauthorized access, loss, misuse or alterations. Please note that no method of transmission over the Internet, or method of electronic storage, is completely secure. While we attempt to protect your personal data, ReEnFoCo, Inc. cannot ensure and does not warrant the security of any information you transmit to us. Similarly, ReEnFoCo, Inc. disclaims liability for Personally Identifiable Information submitted through this Web site. Users are hereby advised that they submit such Personally Identifiable Information at their own risk.

It is important for you to protect against unauthorized access to your password and to your computer. We request that you protect the confidentiality of any User identification and password you use to access any of the Services online. You are responsible for all activity on the Web site accessed by your User identification and password.

## International Transfer of Personally Identifiable Information

This section discloses that information may be transferred into and from servers in the United States.

ReEnFoCo, Inc. is a United States corporation registered in Puerto Rico. If you are located outside the United States and choose to provide information to us, ReEnFoCo, Inc. transfers Personally

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Identifiable Information to the United States for processing. The servers that support this Site and on which we store the information you provide to us through this Site may be in a country other than where you reside. U.S. data protection laws may not provide as much protection as the data protection laws in force in some other countries. The U.S. may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to the U.S., we will protect it as described in this Privacy Policy. By visiting the Site or using our Service, or providing ReEnFoCo, Inc. with any information, you fully understand and unambiguously consent to this transfer, processing and storage of your information in the United States.

In accordance with and as permitted by applicable law and regulations, we reserve the right to transfer your information, process and store it outside your country of residence to wherever we or our Third-Party service providers operate.

## Phishing

This section describes what you should do if you encounter a Site or communication that is phishing.

Phishing Sites imitate legitimate Sites in order to obtain personal or financial information. Identity theft and the practice currently known as “phishing” are of great concern to ReEnFoCo, Inc. For more information about phishing, visit the Site of the Federal Trade Commission at <http://www.consumer.ftc.gov/articles/0003-phishing>. In addition, if you believe you have received an e-mail or had a similar interaction with a third-party pretending to be ReEnFoCo, Inc., please report it at [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Customer Service Information

This section discloses how ReEnFoCo, Inc. may manage information related to a Customer Service request.

When you contact ReEnFoCo, Inc. Support, we will likely record and archive the conversation if a phone call and retain and archive e-mails or instant messages. If you don't agree to this, please contact ReEnFoCo, Inc. Support at [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Electronic Newsletters and Unsubscribe Policy

This section describes how to unsubscribe from communications from ReEnFoCo, Inc.

If you signed up to receive communication from ReEnFoCo, Inc., you may have given us permission to send you news and announcements about our services. If you change your mind, you can unsubscribe from our mailing list at any time through the link we provide at the top and bottom of every mailer. You can also remove yourself from our mailing list by sending an e-mail request to [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Your Access Rights

This section confirms you may request disclosures on what information ReEnFoCo, Inc. has of yours.

As required by applicable law, you may contact us to confirm whether we maintain, or process on behalf of a third-party, any of your Personally Identifiable Information and to review it in order

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to verify its accuracy and the lawfulness of our processing of such Personally Identifiable Information. Where you have determined that the Personally Identifiable Information we collected about you is inaccurate or processed in violation of applicable law, you may also request that your Personally Identifiable Information be corrected, amended, or deleted. Requests for access to your Personally Identifiable Information and to have it corrected, amended, or deleted should be sent to [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Changes to this Privacy Policy

This section makes you aware that ReEnFoCo, Inc. may change the terms of this Privacy Policy at will.

ReEnFoCo, Inc. may update this Privacy Policy at any time and any changes will be effective upon posting. You may access the current version of this Policy at any time by clicking on the link marked "Privacy" at the bottom of each page of the public areas of this Site. Your continued use of the Site or online services provided by ReEnFoCo, Inc. after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes. If there are material changes to the way we treat your Personally Identifiable Information, we may display a notice on the Site when the change becomes effective. We may also notify you by e-mail, but do not commit to providing that notice. These changes will only apply to the information we collect after we have posted the revised Policy or Privacy Notice on this Site. We will use your Personally Identifiable Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the new or revised policy. If you object to any of the changes and no longer wish to use our Services, you are not allowed to access the Site, use our Services, and you may request removal of your Personally Identifiable Information from our system.

This Policy may be supplemented or amended from time to time by additional privacy notices ("Privacy Notices"), provided at the time we collect your information. For example, certain pages of this Site may contain Privacy Notices providing more details about the information we collect on those particular pages, why we need that information, and choices you may have about the ways we use that information. In other cases, specific Privacy Notices may be required to comply with the privacy laws of one of the countries, provinces, or states in which we do business.

## General Audience Service

This section confirms the intended audience for this Site and how ReEnFoCo, Inc. handles information from minors.

The Site and Services is intended for a general audience and for users 18 and older. We do not knowingly collect, use or disclose Personally Identifiable Information from anyone younger than age 18. If we become aware that we are in possession of Personally Identifiable Information from anyone younger than 18, we will use commercially reasonable efforts to delete such information from our system. If you are the parent or legal guardian of a child younger than age 18 and believe that ReEnFoCo, Inc. has possession of Personally Identifiable Information from your child, please contact us at: [hola@reenfoco.org](mailto:hola@reenfoco.org).

## Additional Disclosures

This section provides several miscellaneous disclosures.

# Privacy Policy

**Section Headings:** The section titles, the italicized explanations, the section headings, the subsection headings are provided to assist in document organization or readability and are not part of this Privacy Policy and are not to be used in interpreting the terms of the agreement.

**Terms of Use:** This Policy is part of the Terms of Use that govern your use of this Site. A link to our Terms of Use is provided at the bottom of each page of this Site.

**Stopping Communication:** If you do not wish to be contacted by us for this purpose, or you believe you are receiving our communications in error or no longer want to receive them, you may inform us by clicking on the “unsubscribe” link in any e-mail from ReEnFoCo, Inc. marketing a product or service. We intend to discontinue this type of contact with you within [10] days after we receive your e-mail. **Should you no longer wish to receive our e-mail, please click on the unsubscribe link supplied in each e-mail received and/or contact us via e-mail at [hola@reenfoco.org](mailto:hola@reenfoco.org).**

**Governing Law:** This Policy shall be governed under the laws of Puerto Rico without regard to its conflicts of law provisions.

## Questions

If you have any questions or recommendations about this Site or this Privacy Policy, please contact us at:

ReEnFoCo, Inc.

26 Calle Betances

Utuaado, PR 00641

Telephone: [+1.939.300.4437](tel:+19393004437)

e-mail: [hola@reenfoco.org](mailto:hola@reenfoco.org)