

Privacy Policy

Last Updated: August 2023

Donor Concierge and Surrogate Concierge¹ (“we”, “us” and “our”) value your privacy. This Privacy Policy (“**Privacy Policy**”) applies to all websites, mobile applications, social media pages, and other technologies we own and/or operate, including in connection with our third-party partners (collectively, the “**Sites**”) and to the services we provide (the “**Services**”). The purpose of this Privacy Policy is to provide you with information concerning how we collect, use, maintain, and share your personal information in accordance with applicable data protection laws.

All personal information is collected by or on behalf of the controller:

Donor Concierge
175 Federal Street, Suite 725
Boston, MA 02110

Information We Collect and Process

We may collect one or more of the following categories of personal information about our visitors to our Sites and individuals who use or may use our Services in the future. We collect this personal information when these individuals (i) visit or interact with our Sites; (ii) request additional information about our Services, including through our chat features, forms and applications on the Sites; (iii) register for our Services or contact us; (iv) visit one of our facilities; or (v) otherwise interact with us.

Category of Personal Information Collected	Types of Personal Information	Source of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Name, Alias, Postal Address, Unique Personal Identifiers, Online Identifiers, IP Address, Email Address, Account Name, SSN, Driver’s License Number, Passport Number, Signature, Physical Characteristics or Description, Telephone Number, Education, Employment, Employment History, Bank Account Number, Credit Card Number, Debit Card Number, Financial Information, Medical Information, Medical History, Family Medical History, Mental Health History, Family Mental	Directly from the users of our Services members of their household over 18 or potential users, Cookies.	Identification, Providing Services, Legal & Regulatory Compliance

¹ Donor Concierge and Surrogate Concierge are registered under North Star Fertility Partners, LLC

Category of Personal Information Collected	Types of Personal Information	Source of Personal Information	Business Purpose for Collection of Personal Information
	Health, Criminal and Civil Background Checks, Employment and Education Verification. Health Insurance Information.		
Protected Characteristics	Race, Color, Religion, Sex, National Origin, Age, Disability, Genetic Information, Pregnancy Status, Sexual Orientation, Gender Identity, Familial Status, Disability.	Directly from the users of our Services or potential users.	Identification, Providing Services, Legal & Regulatory Compliance
Sensitive Personal Information	Social Security Number, Driver's License Number, State Identification Card, Passport Number, Racial or Ethnic Origin, Religious or Philosophical Beliefs, Genetic Data.	Directly from the users of our Services or potential users.	Identification, Providing Services, Legal & Regulatory Compliance
Internet, computer, or other similar network activity	Browsing History, Search History, Information Regarding Interactions with a Website.	Cookies, Pixels and other Tracking Devices.	Identification, Providing Services, Legal & Regulatory Compliance
Geolocation Data	Location or Movements	Cookies and other Tracking Devices	Identification, Providing Services, Legal & Regulatory Compliance
Professional or work-related information	Current or past job history or performance, conduct, performance evaluations.	Directly from the users of our Services or potential users.	Identification, Providing Services, Legal & Regulatory Compliance
Inferences Drawn from Other Personal Information	Profiles about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Directly from the users of our Services or potential users.	Identification, Providing Services, Legal & Regulatory Compliance

Other Automatically Collected Information: When you visit our Sites, our servers automatically collect limited information about your computer when you visit our Sites, including via third party pixels and “cookies”. A “cookie” is a small text file that is recorded either temporarily or persistently on your hard drive that a website can use in order to recognize visitors and collect certain information to facilitate their ongoing access to and use of the website. This information may include the type of browser software you use, the operating system you are running, the IP address assigned to your computer or Internet connection, and the IP address of the website, if any, that referred you to our Sites. We use this information to understand how visitors navigate through our Sites, to enhance your experience while using our Sites, and to make the materials we post as valuable to visitors as possible.

Legal Bases for Processing: To the extent we rely on our legitimate interests as a legal basis for processing of your personal information, we have considered the balance between our own interests (among other things, the lawful and efficient operation of our Services) and your interests and we believe that (a) you would reasonably expect us to carry out the kind of processing referenced above and (b) such processing will not cause you any harm and/or will not seriously impact your rights and freedoms with regard to data privacy. You have the right to withdraw any consent given to us for the processing of your personal information. At times, we may also collect your personal information where we have your consent to do so or as otherwise necessary for the performance of a contract to which you are a party, and in order to take steps (at your request) to enter into such contract. We may also collect your personal information as necessary for us to comply with our legal obligations, including to protect your vital interests or those of another.

Use of Personal Information

We process your personal information as necessary for us:

- To provide our Services;
- To fulfill our legitimate interests, including to manage our business operations and optimize our media spend and service experience;
- To take steps to prevent, detect or investigate crime, fraud, misconduct or any unlawful action or omission;
- To comply with policies and procedures under applicable regulations, guidelines or notices as well as our own policies and procedures;
- To inform you of our Services and relevant news; and
- For other purposes with notice to you and with your consent where necessary.

Disclosures of Personal Information

We do not sell your personal information. However, in order for us to provide our Services, we may share your personal information with the following categories of recipients:

- Service Providers, including those who work to enhance our Sites or Services, support our practice management software systems or other customer service-related Services, conduct due diligence, and protect the security of our systems and networks;
- Other Business Partners, including to provide our Services to you or to host events;
- Your medical providers, including those clinics and doctors who are involved in your care;

- Legal/Regulatory Authorities, including to respond to a subpoena or court order, judicial process, or regulatory inquiry; to defend against fraud, lawsuits, claims or other liabilities; and to prevent physical harm or financial loss in connection with any suspected or actual illegal activity.

Cross-Border Transfers

We may transfer your personal information to a jurisdiction other than the one from which we have collected your personal information, including to countries that may not have the same level of protections as the country where you are located. By using our Services and our Sites, you agree to the transfer of your personal information to other jurisdictions.

Retention of Personal Information

We will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements, unless otherwise permitted or required by law.

Security of Personal Information

The security of all personal information provided to us is important and we take reasonable steps designed to protect your personal information. We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use. If you have created an account with us, you are responsible for keeping confidential any usernames and passwords you use to access our Services. Do not to share this password with anyone else and not to use this password for other services or products. If you have reason to believe that your personal information is no longer secure, please immediately contact us as set forth below in the “Contact Us” section.

Your Choices & Rights

Depending upon where you reside, certain choices and rights may be available to you under applicable data protection laws. If you have questions about what rights may apply to you, please contact us.

For California Residents:

Do Not Track: Our websites and apps are not designed to respond to "do not track" requests from browsers.

“Shine the Light” and “Eraser” Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.

2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of Sale or Sharing of Personal Information: Under the CCPA, as amended by the CPRA, California residents have the right to opt-out of the sale of their personal information and/or the sharing of personal information with third parties for the purposes of cross-contextual behavioral advertising or profiling by submitting a request. Please note that we do not sell personal information, including the personal information of any individuals under the age of 16, nor do we share any personal information for the purposes of cross-contextual behavioral advertising.

Your Right to Limit Use of Sensitive Personal Information: California residents have the right to request that we limit our use of any sensitive personal information to those uses, which are necessary to perform the Services or for other business purposes under the CCPA, as amended by the CPRA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, as amended by the CPRA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA, as amended by the CPRA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA, as amended by the CPRA.

For Individuals Located in the European Economic Area (EEA), the United Kingdom (UK) or Switzerland:

You have a number of rights under applicable data protection laws in relation to your personal information. Under certain circumstances, you have the right to:

- *Have access to your personal information by submitting a request to us;*
- *Have your personal information deleted;*
- *Have your personal information corrected if it is wrong;*
- *Have the processing of your personal information restricted;*
- *Object to further processing of your personal information, including to object to marketing from us;*
- *Make a data portability request;*

- *Withdraw any consent you have provided to us;*
- *Restrict any automatic processing of your personal information; and*
- *Complain to the appropriate Supervisory Authority.*

Verifying Your Request: Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

Third-Party Links

We may provide links to other sites or resources provided by third parties. These links are provided for your convenience only. We have no control over the contents of those sites or resources, and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access any of the third-party links on the Sites, you do so entirely at your own risk and subject to the terms and conditions of those sites.

Children

We do not knowingly collect personal information from children under the age of 13 through our Sites. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children never to provide us personal information. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that personal information from our databases.

Changes to this Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing and using the Sites after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

Contact Us

If you have any questions regarding this Privacy Policy or our privacy practices, please contact us at 1-888-987-7577. If you are in the United Kingdom or European Economic Area ("EEA") and believe we have not adequately resolved any issues, you may contact the Supervisory Authority concerned.