



goodfinity

Goodfinity Privacy Policy

Last modified: April 23, 2026

1. About This Policy

Goodfinity (a division of Level Up Strategies Inc., "Goodfinity," "we," "us," or "our") is a Canadian software company offering impact-reporting and donor-analytics services to charities and nonprofits. This Privacy Policy describes how we collect, use, disclose, and protect personal information about:

- visitors to our websites, including goodfinity.ca and goodfinity.com (the "Sites");
- people who contact us, request a demo, or sign up for our mailing lists;
- representatives of organizations that subscribe to our services; and
- people we connect with for business development and partnerships.

This Policy does not describe how we handle personal information that our customers (charities and nonprofits) upload to our platform about their donors, volunteers, or staff. That processing is governed by our Cloud Data Processing Addendum, and our Customers — not Goodfinity — are responsible for notifying the individuals whose information they upload.

2. Information We Collect

We collect the following categories of personal information:

- **Identifiers and contact information** you provide (name, email address, phone number, organization name, job title);
- **Commercial information** about your organization (size, type of nonprofit, services of interest);
- **Internet activity** on our Sites (IP address, browser and device information, pages viewed, referring URL, approximate location derived from IP);
- **Correspondence** (the content of your emails, support tickets, and meeting notes with our team);
- **Marketing preferences** (mailing-list subscriptions, communication preferences, event attendance).

We do not intentionally collect sensitive personal information through our Sites. We do not collect precise geolocation. We do not knowingly collect personal information from children under 13 (U.S.) or under the age of majority in Canadian provinces.



3. Sources of Information

We collect this information:

- directly from you, when you fill out a form, contact us, subscribe, or create an account;
- automatically, through cookies and similar technologies when you use our Sites (see our Cookie Notice for details);
- from publicly available sources, such as charity registries, LinkedIn, and other professional directories, when we research prospective customers; and
- from third-party services we use to run our business (for example, our CRM, analytics providers, and advertising platforms).

4. How We Use Your Information

We use personal information to:

- operate, maintain, and improve our Sites;
- respond to your inquiries, provide demos, and onboard new customers;
- send you service-related communications, product updates, and marketing emails (you can unsubscribe at any time);
- understand how visitors use our Sites and improve our content, product, and marketing;
- protect our Sites, customers, and business from fraud, abuse, and security threats;
- comply with applicable law, including tax, accounting, and anti-money-laundering obligations; and
- pursue our legitimate business interests, including business development, partnerships, and reporting to investors

We do not use personal information for automated decision-making that produces legal or similarly significant effects about you.

5. How We Share Your Information

We share personal information with:

- **Service providers** we use to run our business, including cloud hosting, email and marketing platforms, CRM, analytics, customer support, accounting, and payment processing. Each is contractually required to protect your information and use it only to provide services to us.
- **Professional advisors**, including lawyers, accountants, and auditors.
- **Government authorities and other third parties**, where required by law, legal process, or to protect our rights.
- **Prospective or actual purchasers** of our business, in the event of a corporate transaction.

We do not sell your personal information. We do not share your personal information for cross-context behavioural advertising as those terms are defined in U.S. state privacy laws. If this ever changes, we will update this Policy and provide the opt-out mechanisms required by law.



6. Cookies and Similar Technologies

We and our service providers use cookies, pixels, and similar technologies on our Sites. See our Cookie Notice for details and to manage your preferences.

7. How Long We Keep Your Information

- We keep personal information for as long as we need it for the purposes described in this Policy, or as required by applicable law. In general:
- marketing-list data: until you unsubscribe, and then for a short period to honour your request;
- customer-account data: for the life of your subscription plus a reasonable retention period;
- correspondence: typically 2–7 years, depending on the nature of the communication;
- website analytics: typically 14–26 months in aggregated form.

8. How We Protect Your Information

We implement reasonable administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, use, disclosure, alteration, and destruction. These include encryption in transit and at rest, access controls, secure development practices, and vendor due-diligence. No system is perfectly secure, and we cannot guarantee the security of information transmitted to or from our Sites.

9. Where We Process Your Information

Goodfinity is headquartered in British Columbia, Canada. Personal information may be processed in Canada and the United States, and by our service providers in other jurisdictions where they operate. Information processed outside your home jurisdiction is subject to the laws of the jurisdictions where it is processed, which may include lawful-access requests from government authorities. If you are a resident of Quebec, and you have questions about cross-border transfers of your personal information, you can contact our Privacy Officer at the address in Section 14.

10. Your Rights — United States

If you are a resident of California, Virginia, Colorado, Connecticut, Utah, Texas, or another U.S. state with a consumer privacy law, you have the following rights, subject to limits in the applicable law:

- **Right to know** what personal information we have about you and how we use it;
- **Right to access** a copy of your personal information;
- **Right to correct** inaccurate personal information;
- **Right to delete** your personal information;



- **Right to opt out of sale or sharing** of personal information (as noted, we do not sell or share);
- **Right to limit use of sensitive personal information** (as noted, we do not use sensitive personal information for purposes that would trigger this right);
- **Right to data portability** in certain circumstances;
- **Right to non-discrimination** for exercising your rights.

To exercise these rights, email us at privacy@goodfinity.ca or use the contact form at www.goodfinity.ca. We will verify your identity before responding, and we will respond within the timeframes required by applicable law (generally 45 days for California, with a possible 45-day extension).

You may designate an authorized agent to make a request on your behalf. We will require proof of the agent's authorization and may verify your identity directly.

If we deny a request, you can appeal by replying to our response with the word "Appeal" and your reasoning. We will respond to appeals within the timeframes required by applicable law.

California residents can also contact the California Attorney General's office to file a complaint.

11. Your Rights — Canada

If you are in Canada, you have the right, under PIPEDA and applicable provincial privacy legislation (including the Quebec Privacy Act as amended by Law 25, BC PIPA, and Alberta PIPA), to:

- access the personal information we hold about you;
- request that we correct inaccurate personal information;
- withdraw your consent to our use of your personal information, subject to contractual and legal limitations;
- file a complaint with the Office of the Privacy Commissioner of Canada or your provincial privacy commissioner (in Quebec, the Commission d'Accès à l'Information).

Québec residents also have the rights to portability and to object to automated decision-making, to the extent those rights apply to our processing of your information.

To exercise any of these rights, email our Privacy Officer at privacy@goodfinity.ca.

12. Marketing Communications

You can unsubscribe from marketing emails at any time using the unsubscribe link in any email, or by emailing privacy@goodfinity.ca. We will continue to send you service-related communications necessary to administer your account.



Our marketing emails comply with Canada's Anti-Spam Legislation (CASL) and the U.S. CAN-SPAM Act. If you believe we have sent you a commercial email in violation of these laws, please contact us

13. Children's Privacy

Our Sites and services are directed at organizations and their authorized representatives, not at children. We do not knowingly collect personal information from children under 13 (in the United States) or under the applicable age of majority in Canadian provinces. If you believe we have inadvertently collected information from a child, contact us and we will delete it.

14. Contact Us

Goodfinity's Privacy Officer is the person in charge of the protection of personal information for purposes of PIPEDA and the Quebec Privacy Act. You can contact the Privacy Officer at:

- Email: circle@goodfinity.ca
- Mail: Goodfinity Privacy Officer, 101-1865 Dilworth Drive, Kelowna, British Columbia, Canada V1Y 9T1

For general inquiries, email circle@goodfinity.ca.

15. Changes to This Policy

We may update this Policy from time to time. When we do, we will change the "Last modified" date at the top of this Policy and, where required by law, provide additional notice (for example, an email or a prominent notice on our Sites). We review this Policy at least annually.