

HORACE SMITH FUND PRIVACY DISCLOSURE

At the Horace Smith Fund, protecting your confidence in every aspect of our relationship with students and their parents is very important to us. Protecting the privacy of those who apply for scholarships is one of the core tenets of the Horace Smith Fund and its trustees. You have chosen to apply with us for aid for yourself or your child, and we recognize our obligation to keep the information you provide to us secure and confidential. Please note that whenever we refer in this disclosure to the terms “we”, “us”, or “Fund”, it means the Horace Smith Fund. References to the terms “you” and “your” mean you, the person who is providing the information to us as an applicant, parent of an applicant or reference person.

You should know that we will respect your privacy. Safekeeping of your personal information is a priority with the Fund. We want you to understand our policies and practices about handling information. We also want you to know that we comply with the various laws and regulations designed to secure that privacy.

We will keep confidential any information about you, and will only use this information to review each applicant to determine their eligibility for scholarship awards granted by the Horace Smith Fund. "Information" means nonpublic, personal financial information that we may have on record about you as described below.

1. **What information do we normally collect about you?** Depending upon the type scholarship or fellowship you apply for with us we may routinely collect or retain information that includes your:
 - name, address, telephone number, social security number, annual income, current and past employers;
 - answers to questions on scholarship / fellowship applications; and
 - references from various educators and others that you have provided to us as part of the application process.
2. **How do we safeguard this information?** The Fund maintains appropriate security safeguards and procedures regarding customer information. This includes use of passwords and access codes to prevent revealing sensitive customer information to inappropriate or unauthorized sources. Information that we have about you is available to our employees, trustees, and agents on a "need to know" basis so they can do their jobs. We prohibit our employees and agents from giving information about you to anyone in a manner that would violate any applicable law or our privacy policy. We do not provide information about you to anyone without first verifying who the requester is and whether they may have legal access to the information. We train our employees to protect information we have about you. We also have our outside auditor review our security and confidentiality procedures to make sure they work.
3. **How do we restrict disclosure of account information?** We do not reveal specific information about applicants or their applications to unaffiliated third parties with the following exceptions:
 - a. If you request in writing that we provide it to another party, and your request is no more than 45 days old,
 - b. To validate educational records or references provided by you as part of your application (for example, to complete a scholarship application with your high school guidance counselor);
 - c. If the information is required for legitimate Fund use, in accordance with applicable law and our standard practices (for example, this includes information provided to attorneys, collection agencies, and credit reporting agencies for the purposes of collecting debts (applicable only to student loans previously taken with the Fund), or for verifying an applicant's existence.

- d. If the information is required by a bank auditor or examiner for the purpose of completing an official audit of the Fund (for example, during our audits by our accounting firm).
 - e. If the information is required by or allowed by law (for example, a court ordered subpoena or other court order to produce records regarding any application with the Fund.) In such instances, information provided is limited to that required by the specific law.
 - f. In the event we use any outside party to help us complete any application or any of our procedures, please be assured that as part of any contract we have any third party company or vendor, we require a provision on confidentiality with respect to any information that we may have provided, including any information about our applicants.
4. **Account Numbers and Codes:** We will not disclose your application number or any access code, or application number for a student loan to a nonaffiliated third party in order for them to sell you products or services. (Following applicable to Horace Smith Fund student loans only) We do report to consumer reporting agencies various information on your payment history on loans you may have with us, which may include your loan account number because we are allowed or are required to do so by law.
5. **Information Sharing-**
- **Agent Nonaffiliated Companies or Persons:** We may share information about you with our affiliated agents (Example of this type agent would be members of our various scholarship committees who review and help us award the various scholarships and fellowships). We may also share information with certain nonaffiliated companies that act as our agents that help us perform necessary business functions or services. (Example of this type agent would include a collection service or data processing service bureau for loans made by us). This sharing is permitted by law. Such agents are required by policies and our agreements with them to keep any information about you that we give them totally confidential.
 - **Non-agent, Nonaffiliated Companies or Persons:** We do NOT share information about you with any other outside parties. We NEVER sell or distribute mailing lists or information about applicants or their families.
6. **Information Related to using our Online applications at the Horace Smith Fund:**
- **Protecting Your Online Applications Or Enrollment Forms:** The online application forms on the Horace Smith Fund Web site use state-of-the-art security technology including the latest 128 bit Secure Socket Layer (SSL) to transfer your information across the Internet to us. This technology encrypts or scrambles the information you provide so it's virtually impossible for anyone other than the Fund to read it. We use this technology whenever confidential information, such as your social security number is requested. After you have submitted your application online, we recommend that you end your browser session before leaving your computer.
- A. **Remember,** if you are not comfortable with our online process, you can always print out a PDF version of the form and submit it to us by more traditional US Mail or in person.
 - B. **When you visit our website:** Some areas of our Web site require information, such as your e-mail address or phone number, to enable you to correspond with us. In these cases, we collect your information necessary to interact with you and any information that you knowingly and voluntarily provide to us, such as your name, address and any other information you fill in or complete when you e-mail us or on the contact form or other forms you may complete online. We use the information we collect to measure the number of visitors to different sections of

our web site, and to help us make our site more useful. If you do not interact with us, any personal information, such as your e-mail address, is not collected.

- C. **When you voluntarily choose to send us information** by accessing our web site, you consent to our use of the information as stated in this disclosure. We use the information you supply to us by us primarily to process your request, inquiry or application.
 - D. **Protecting Your Personal Identification Number (PIN) and Access Codes:** Our staff WILL NEVER ask you for your personal information via an e-mail or by phone. If you are asked for this information by anyone, please call 1-413-739-4222 immediately and report it to a staff member of the Horace Smith Fund.
 - E. **How We Handle E-Mail:** If you send us e-mail, we may retain the content of the e-mail and your e-mail address in order to respond to questions or concerns that you may have. Your e-mails to us should be sent using the www.HoraceSmithFund.org "Contact Us" page. Since an Internet e-mail response back to you would not be secure, we will not include confidential account information in an e-mail response. PLEASE NOTE that your own web browser e-mail is not necessarily secure against interception. If your communication is very sensitive, or includes personal information such as your account numbers, credit card number or social security number, you may want to call us or send it through the U.S. Post Office instead. You may also contact us by phone, U.S. mail or by stopping by our office.
 - F. **About "Cookies":** When you logon to www.HoraceSmithFund.org, we use a "cookie" as part of our interaction with your browser. A "cookie" is a small text file placed on your hard drive by our Web Page server. Cookies are commonly used on Web sites and do not harm your system. We use cookies to establish and maintain your online application session. These cookies do not collect personally identifiable or confidential information. These cookies will automatically be deleted once you exit your browser.
 - G. **Protecting our children:** Other than information asked of young adults and high school seniors to complete an online application for an educational scholarship, the Horace Smith Fund does not knowingly solicit other data from children, and we do not knowingly market to children. We recognize that protecting children's identities and privacy online is important and that the responsibility to do so rests with both the online industry and with parents.
 - H. **Taking steps yourself to protect your own online security:** The Horace Smith Fund is committed to making sure that your online application with us is safe and secure. With our own security infrastructure in place, we are confident that access to your applications is private and secure; we are unable to provide similar assurances for other websites. While the Horace Smith Fund works to protect your privacy, you also play a role in protecting your accounts. Only provide your access ID or Online ID when your browser shows a Secure Socket Layer (SSL) connection (such as the "locked padlock" icon) directly to the www.HoraceSmithFund.org website or another site you have investigated and fully trust. You should also have an up-to-date version of anti-virus software anti-spy-ware software and use it before opening e-mails attachments to protect yourself against potentially damaging computer viruses.
7. **Linked Sites:** Please note that since we cannot control information on other Internet sites, we are not responsible for the content of sites linked from our website, such as the college board or any other sites that we might provide a link for convenience from time to time.