



# PRIVACY POLICY 2025 Veteran and Vetrepreneur of the Year® Program

This Privacy Policy ("Policy") describes how Military Friendly®, Vigtory®, and its subsidiaries ("Program Organizers") collect, use, and protect personal information in connection with the Veteran and Vetrepreneur of the Year® Program ("VOY Program").

## 1. SCOPE AND JURISDICTION

# 1.1. Governing Law

This Policy is governed by the laws of the Commonwealth of Pennsylvania. Any disputes regarding privacy matters shall be resolved in Pennsylvania courts.

# 1.2. Application

This Policy applies to all nominees and participants, awardees, website users and voters, program volunteers and staff.

#### 1.3. Public Information Exclusion

Publicly available information, including but not limited to public records, news media, social media posts, published materials, and government and non government databases, are not protected by this privacy policy.

#### 2. INFORMATION COLLECTION AND USE

# 2.1. Personal Identifiable Information (PII)

We collect and maintain the following categories of PII:

### **Required Information:**

- Full legal name
- Military service records
- Date of birth
- Contact information
- Government-issued identification

# - Background check information

# **Optional Information:**

- Professional history
- Educational background
- Awards and recognition
- Social media handles
- Photos and videos

#### 2.2. Information Collection Methods

Information is systematically gathered through various channels, including online nomination forms, website registration, direct submissions, third-party verification services, program participation, and event registration.

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## 2.3. Use of Information

Collected information is used for program administration, participant verification, communication, marketing and promotion, statistical analysis, and legal compliance.

## 2.4. Special Categories of Information

Military service-related information includes: DD-214 or equivalent, service records, military awards, unit affiliations, and deployment history.

# 3. INFORMATION PROTECTION AND SECURITY

## 3.1. Security Measures

We implement appropriate technical and organizational measures to ensure the highest standards of security are practiced. Encryption of sensitive data for long term storage and archiving, secure data storage systems via cloud, access control protocols when necessary, regular security audits are conducted. We provide employee training an best practices. We also have standard procedures for incident response.

#### 3.2. Data Access Controls

Private and secure data can be accessed by roll based access restrictions. We use multi-factor authentication, activity logging and monitoring, regular access reviews, and provide contractor oversight.

## 3.3. Data Retention

Data and information is stored for active program duration and historical information is archived for the duration that the VOY program is active regardless of naming year. Full access is provided during the participants' naming year. Post-program participant data has limited data retention. At request or disgualification, permanent deletion protocols are practiced. Exception handling procedures

### 3.4. Security Clearance Considerations

For participants with security clearances:

Modified data collection, restricted access protocols with sensitive data as requested by the governing agency. We use secure communication channels if communication and coordination with security offices is requested. If in the event a request of verification and background will be at risk we will accept alternative verification methods on a case by case basis. Participant is liable for communication and notification to any and all government or private entities notice of background check. Organizer is not responsible for contacting or initiating andy conversation or communication with security offices or private employers with interest to security clearances, participants will be responsible for coordination and communication to the offices.

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#### 4. INFORMATION SHARING AND DISCLOSURE

## 4.1. Authorized Sharing

Information may be shared with program administrators and staff, review board members, verification services, marketing partners, legal authorities when required, program sponsors, and the general pubic,

### 4.2. Public Information

The following may be made public: Name and military branch, Impact category participation, award recognition, program photographs, public statements and interviews, information already in public domain and nominee or awardees profile information.

## 4.3. Third-Party Service Providers

We reserve the right to engage third parties for the following procedure but not limited to background checks, verification services, website hosting, data analysis and collection, data storage, marketing services, voting and nomination procedures and collection.

## 4.4. Marketing and Promotion

Program Organizers may use any available data or biographical information on the participant via public domain in addition to provided information during the nomination and awards selection process. Such as but not limited to success stories, testimonials, program photographs, photos provided through the nomination process, public appearances, media interviews, supplied photos or information from nominees nominator, employer, educational institution, community partner, or nominator.

#### 5. PARTICIPANT RIGHTS AND CHOICES

#### 5.1. Access Rights

Participants have the right to and review personal information, request corrections, access submission history and nominations, request to obtain data copies, and request for a review usage records

#### 5.2. Opt-Out Options

Awardee are asked to stay in communication in order to continue to fulfill any program obligations or requests. Participants who are not national or state level awardees may opt-out of any of the following at anytime: marketing communications, public recognition, photo/video usage, non-essential communications, data sharing

#### 5.3. Data Correction

Procedures for Information updates, record corrections, documentation changes, profile updates, or historical revisions can be made within the users nomination profile or by request at VOY@Militaryfriendly.com.

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#### 5.4. Account Closure

Program withdrawal is an option. Data deletion requests can be made. Requests to archive data are possible. Data retention is limited. Verification of deletion is available.

#### 6. LEGAL PROVISIONS AND CONTACT INFORMATION

# 6.1. Governing Law

Pennsylvania state law governs the provisions. The program has exclusive jurisdiction in Pennsylvania courts. It includes binding arbitration. A class action waiver applies. Compliance with local laws is ensured.

# 6.2. Policy Updates

Program Organizers may modify policy terms. They can update security measures. Procedures may be revised. Enhancements to protections are possible. Notifications will be provided for changes.

## 6.3. Liability Limitations

The program is not liable for public information usage. Third-party actions are excluded from liability. Liability does not extend to participant disclosures. The program is not responsible for required legal reporting. Security incidents are an exception to liability.

# 6.4. Contact Information

For privacy matters: Military Friendly® 333 Rouser Road Pittsburgh, PA voy@militaryfriendly.com

#### 6.5. Effective Date

This Privacy Policy is effective as of 1/1/2025 and supersedes all previous versions.

By participating in the VOY Program, you acknowledge and accept this Privacy Policy in its entirety.