

JA Alumni Network Privacy Statement

Effective Date: November 1, 2019

JA Worldwide, Inc. (“Company” or “JA”) believes you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. JA wants you to make the best decisions about the information that you share with us. This Privacy Statement describes the privacy practices of JA.

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The JA Alumni Network Privacy Statement: Overview

Welcome to the JA Alumni Network Privacy Statement. The JA Alumni Network (“Network” or “Site”) is administered by KIT UNITED SAS (“Hivebrite”) on behalf of JA. Hivebrite and JA are at times collectively referred to as “We.”

The Network is a global community for alumni of JA programs. Its purpose is to help foster a long-term relationship between you, JA, JA Members, Regional Operating Centers (ROCs), JA Alumni Groups, and other JA-program alumni. This Privacy Statement applies to the Network, communications, surveys, and other Alumni Program Services (“Services”).

We care deeply about your privacy, and We are fully committed to protect your personal information and use it properly in compliance with data privacy laws. This Privacy Statement describes how We collect and use personal information, and the rights and choices available to you regarding such information.

We strongly urge you to read this Privacy Statement and make sure you fully understand it, before you decide to participate in the Network. If you read and fully understand this Privacy Statement, and remain opposed to our practices, do not register for the Network. If you have any questions or concerns regarding this Privacy Statement, please contact us at privacy@jaworldwide.org.

The Network is a private site for alumni and employees of JA, its JA Members, its ROCs and JA Alumni groups. Do not give out your username or password to anyone. Please refer any alumni seeking to gain access to the Network to www.gather.jaworldwide.org so they can register. Additionally, please respect the privacy of other alumni by refraining from giving out personal information obtained from the Network to anyone.

Please note that this Privacy Statement could be updated to reflect any changes in the way We handle your personal data or any changes in applicable laws. If We make material changes to the Privacy Statement, We will provide you notice so you have an opportunity to review the changes and, if you object to those changes, delete your account before they become effective. By continuing to access or use the Network and Services, after those changes become effective, you agree to be bound by the revised Privacy Statement.

All pages in the Network, including the pages where you will provide personal information, include a link to this Privacy Statement.

What personal information We collect when you register and use the JA Alumni Network?

We collect personal information when you directly provide it to us when you register for the Network. Your decision to provide any personal information is voluntary. To register and to set up your profile, you will need to provide us with your name and email address. You will also be able to build your Network profile by providing additional information, including:

- photo;
- postal address;
- phone number(s)
- additional email address(es)
- current occupation;
- industry;
- education;
- skills;
- personal and business interests; and
- Social Media Handles.

Some of this information may be imported via LinkedIn. Keep in mind that by providing complete and accurate information in your profile, We are able to customize your experience and help you get the most from JA's Services. However, please only provide information that is relevant to the stated purpose of the Network.

Additionally, We collect personal data you may provide while using the Network, including in the following situations:

- correspondence between you and the Network;
- information you post on the Network, such as resumes, job applications, event RSVPs, and comments on news articles;
- responses to online surveys or forms used for feedback, research, and product improvement.

While We ask members of the Network to respect the privacy of other alumni by refraining from giving out personal information obtained from the Network to anyone, you should keep in mind that whenever you voluntarily disclose personal information in the Network—whether in the option fields for your profile, through email, or in other areas of the Network—that information can be accessible to all members of the Network and, therefore, could be made public. **Do not post or add personal information to your profile or elsewhere in the Network that you would not want to have publicly available.**

What personal information We automatically collect when you use the JA Alumni Network?

When you use the Network, We collect information about your visit and usage of the Site. Some of the information is collected using Google Analytics, a third-party tool. The information may include your IP address, your operating system, your browser ID, and other information about how you interact with the Site. We use this information to improve our services and the user experience as well as network management and security.

We and Google also use various technologies to collect and store information when you use the Site, including cookies and similar tracking technologies, such as pixels and web beacons, to analyze trends, administer the Website, track users' movement around the Site, and identify ways to improve the Network and determine how We can make the Network a more positive and relevant user experience.

For additional information on how We use cookies and other tracking technologies, as well as how to opt out of the use of cookies, please see our [Cookies Statement](#). You can reject some or all cookies We use by changing your browser settings. However, doing so can impair the use of the Network or some of its features. For further information about cookies, please visit www.allaboutcookies.org.

What about sensitive data?

We do not generally collect sensitive data (also known as special categories) through the Site or otherwise. Sensitive data is not required to register with the Network. The term "sensitive data" refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

In the limited circumstances where We may collect such data, We will do so in accordance with all applicable data privacy law requirements, which may include obtaining consent. If you choose to provide us or members of the Network with unsolicited sensitive data, you are consenting to us using the sensitive data, subject to applicable laws as described in this Privacy Statement.

Is there a minimum age requirement to register for the JA Alumni Network?

The Network is not directed to children, and you may not use our services if you are under the age of 16. You must also be old enough to consent to the processing of your personal data in your country.

How do We use your personal information for the JA Alumni Network and other Services?

We will use your personal information only where required for specific purposes. The following are specific purposes for which We use your personal information:

- To create a global community of JA-program alumni so that you can stay connected to JA, JA Members, ROCs, JA Alumni Groups, and other JA-program alumni around the world.
- To provide you with a customized experience on the Site, including personalized services, such as, suggested contacts, news, events, volunteer opportunities, employment opportunities, and interactive communications.
- To enable other users of the Network to search for and locate you via the Site's Directory search function.
- To research and analyze the Site's users' demographics, interests, and behavior in an aggregated form, including to improve our Services and the JA-program experience for all participants, to measure the impact of participation in JA programs and events and communicate such impact measurements to donors and other stakeholders, to better understand and serve you and other users, and to improve our Site and its offerings.
- To contact you periodically with communications about events, publications, or employment opportunities with JA, JA Members, ROCs, JA Alumni Groups or partners, which We believe might interest you, unless you ask not to be contacted. You will have the opportunity to opt out of receiving further messages.
- To get your feedback and viewpoints through polls and surveys conducted by us and others. You are not obligated to respond to polls and surveys and can choose only the information you wish to provide.

We do not rent or sell your personal data to others.

What is our legal basis for collecting and using your personal information?

We will process your personal data for the purposes set forth in this Privacy Statement based on your consent, and otherwise in accordance with applicable laws. We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorized by law.

How is your personal information shared?

Alumni use the Network and our Services to connect with JA, JA Members, ROCs, JA Alumni Organizations, and other JA-program alumni around the world. We make this possible by sharing your information in the following ways:

- Users of the Network: We will share your personal information with other users of the Network through the Directory search function of the Site and your profile. You have control over this access through the privacy settings in your profile. Click on the edit icon or button in any section of the profile to find the privacy settings. These have been set to Members by default, meaning all members of the Site can see this information. You can select to make information in your profile visible to only you, just your contacts, all members of the Site, or all parties including third party posters. Regardless of your privacy settings, JA, JA Members, ROCs, JA Alumni Groups and Conenza will have access to your profile information.
- Service Providers: We will share your personal information with our service providers, including Conenza for corporate alumni software and services, and its contractors:
 - Amazon Web Services (AWS) for its data center facilities.
 - Rocket Science Group LLC (d/b/a MailChimp) for its marketing automation platform.
 - Palo Alto Software for its Email Center Pro product, which provides email management.
- Business Partners: We will share your personal information with business partners or sponsors where this is necessary for the purposes related to the Alumni Program. JA Worldwide does not share personal information outside of the organization. Any business partnerships that would require personal information will be set up for each individual to provide explicit consent and opt-in.
- Legal: We will share your personal information when required to comply with a court order, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- Merger or acquisition: We will share your personal information to a third-party acquirer if JA or Conenza sells or liquidates all or any part of its business or assets. In that event, any acquirer will be subject to our obligations under this Privacy Statement and you will have the same rights with respect to your personal information.

How do We share your personal information globally?

Personal information collected within the European Economic Area (“EEA”) may be transferred to countries outside of the EEA for the purposes described in this Privacy Statement. For example, if an alum that resides outside the EEA uses the Directory search function to find you and views the personal information in your profile, your personal information will, in effect, be transferred outside of the EEA. We have no control over other alumni’s use of your personal information.

Additionally, We may transfer your personal data out of the EEA for the purposes described in this Privacy Statement to Service Providers, JA, JA Members, ROCs, and JA Alumni Groups located outside of the EEA.

By voluntarily providing your personal information when you register for the Network and Services and by completing your profile, you are consenting to the transfer, storing, and processing of your personal information outside of the EEA.

If you are a citizen of the EEA, and you have an unresolved privacy or data concern that We have not addressed satisfactorily, please contact the appropriate EU Data Protection Authority (DPA) free of charge. A list of DPAs can be found [here](#). For purposes of EU Data privacy laws, JA is the Controller and Conenza is the Processor.

How do We safeguard your personal data?

We understand that the security of your personal information is important. We maintain organizational, physical, and technical security arrangements for the personal data We collect.

Conenza administers the Network. Conenza implements security safeguards designed to protect your data, such as HTTPS. Conenza regularly monitors its systems for possible vulnerabilities and attacks. However, despite our efforts, no security controls are 100% effective, and We cannot ensure or warrant the security of the personal information you provide to us. There is no guarantee that the data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

Your user account information is password-protected. Do not divulge your password to anyone. Also remember to sign out of your account and close your browser window when you have finished using the Site, particularly if you share a computer with someone else or are using a computer in a public place like a library or internet café.

The Site may, from time to time, contain links to other Websites. If you follow a link to any of these Websites, please note that they may have their own privacy statements and that We do not accept any responsibility or liability for these statements or Websites. Please check these privacy statements before you submit any personal data.

How long do We retain your personal information?

When you register for the Network, We process and keep your personal information for as long as you are a member of the Network. If you decide to delete your account, We will retain your personal information for 60 days before permanently deleting it, unless legally required to retain the information for a longer period.

What are your rights?

You are entitled to know what personal information We process and store about you and to have access to that information. You can access, edit, or correct the information in your profile at any time. You can request access to your information by emailing privacy@jeworldwide.org.

You can choose not to receive any communications from JA about events or publications We feel might be of interest to you.

You can request to have your personal information and account deleted. You may delete your account by emailing privacy@jeworldwide.org "Please delete my account."

Who can I contact at JA with questions or concerns?

If you have a privacy question, concern, or request, please contact us at: privacy@jeworldwide.org