

## **PRIVACY POLICY**

#### LAST UPDATED ON: 9 FEBRUARY 2021

This is the The Class Foundation ("we," "us" or "our") Privacy Policy. On this page, we explains how we collect, use, share and protect information in relation to our website **www.theclassfoundation.com**, and your choices about the collection and use of your information.

By using our website you understand and agree that we are providing a platform for you to post content, including photos, comments and other materials ("**User Content**"), to the website and to share User Content publicly. This means that other Users (as defined below) may search for, see, use, or share any of your User Content that you make publicly available through the website, consistent with the terms and conditions of this Privacy Policy and our Terms of Use. Our Privacy Policy applies to all visitors, users, and others who access the website ("**Users**").

At The Class Foundation we take user rights and data privacy and protection very seriously. We recognise our obligations in updating and expanding this program to meet the demands of the GDPR and the Dutch Data Protection Act.

## What user data do we collect?

Depending on what you do on our website, we gather different information about our visitors.

### Information you provide

For our events and contact forms we may ask to receive the following information

- First name
- Last name
- Email
- Organisation
- Job title
- Location
- Phone
- User content (i.e. photos, bios)



## Log file information

We collect information that your browser sends whenever you visit our website. This log file information may include your computer's Internet Protocol (IP) address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

### Metadata

Metadata is usually technical data that is associated with User Content. For instance, metadata can describe how, when and by whom a piece of User Content was collected and how that content is formatted. Users can add or may have metadata added to their User Content including a hashtag (e.g. to mark keywords when you post a photo), geotag (e.g. to mark your location to a photo), comments or other data. This makes your User Content more searchable by others and more interactive.

### **Analytics services**

#### (non-personally identifiable information only)

We use third-party analytics tools to help us measure traffic and usage trends for the website. These tools collect information sent by your device or our website, including the web pages you visit, add-ons, and other information that assists us in improving the website. The tools use 'cookies', which are text files placed on your device, to collect your log information and behaviour information in an anonymous form. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. With respect to Google Analytics, Although Google Analytics plants a permanent cookie on your web browser to identify you, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognising you on return visits by disabling cookies.



# Why do we collect user data?

We use all of the information we have to help us provide and support our website by:

- Remembering information so you will not have to re-enter it during your visit or the next time you visit;
- Providing, improving, testing, and monitoring the effectiveness of our website;
- Monitoring metrics such as total number of visitors, traffic, and demographic patterns;
- Organising and keeping track of supplied data in a CRM tool provided by Salesforce;
- Diagnosing or fixing technology issues;
- Developing and testing new products and features.

## How is the user data shared?

We will not rent or sell your information to third parties outside The Class Foundation.

#### People you share and communicate with

Any information or content that you voluntarily disclose for posting to the website, such as User Content, becomes available to the public. Once you have shared User Content or made it public, that User Content may be re-shared by others. Subject to your profile, any User Content that you make public is searchable by other Users. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users or third parties have copied or saved that information.

### **Change of control**

If we sell or otherwise transfer part or the whole of The Class Foundation or our assets to another organisation (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address, User Content and any other information collected through the website may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honour the commitments we have made in this Privacy Policy.



### Legal requests and preventing harm

We may access, preserve, and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good-faith belief that the law requires us to do so. We may also access, preserve, and share information when we have a good faith belief it is necessary to: detect, prevent, and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

## Safety and security

The Class Foundation has taken appropriate technical and organisational measures by using the latest technologies to protect your information against loss or unlawful processing. We use safeguards to help keep the information collected through the website secure, thanks to Webflow and AWS technologies, including:

- SSL Certificate;
- Two-factor authentication;
- DDoS protection: AWS Shield;
- Filter malicious web traffic: AWS Web Application Firewall;
- Data protection: Amazon Macie;
- Investigate security issues: Amazon Detective;
- Secure access to services and resources: AWS Identity & Access Management (IAM);
- Cloud SSO service: AWS Single Sign-On;
- Threat detection service: Amazon GuardDuty.

However, The Class Foundation cannot ensure the security of any information you transmit to our foundation or guarantee that information on the website may not be accessed, disclosed, altered, or destroyed. We request you to do your part to help us. You are responsible for controlling access to emails between you and our foundation, at all times. We are not responsible for the functionality, privacy, or security measures of any other organisation.



## **International transfer**

Your information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside the Netherlands and choose to provide information to us, please note that we transfer the information to The Netherlands. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **Retention period**

In accordance with the law, The Class Foundation does not retain data any longer than is required for attaining the purposes for which they were collected.

## Inspection and correction

If you wish to know which personal user data The Class Foundation has recorded or if you wish to amend or remove data that you cannot amend yourself, please contact our team via info(@)theclassfoundation.com.

## Third-party applications, websites, and services

We are not responsible for the practices employed by any applications, websites, or services linked to or from our website, including the information or content contained within them. Please remember that when you use a link to go from our website to another application, website or service, our Privacy Policy does not apply to those third-party applications, websites or services. Your browsing and interaction on any third-party application, website or service, including those that have a link to our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorise to access your User Content. If you are using a third-party app, website or service and you allow them to access your User Content you do so at your own risk.

## **Children's privacy**

Our website does not address anyone under the age of 13 ("**Children**"). We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under age 13 without verification of parental consent, we take steps to remove that information from our servers.

# Changes to this privacy policy



We may modify or update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. Changes may include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing GDPR compliance.

# How to contact us

If you have any questions about this Privacy Policy, please send an email to our team via **info(@)theclassfoundation.com.** We may update this Privacy Policy at any time and we recommend you check this page regularly as your continued use of the site signifies your acceptance of any changes.