# PRIVACY POLICY AGREEMENT

#### EFFECTIVE JANUARY 13, 2024

Synalima™ ("Synalima"), a non-profit educational organization, values its users' privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website or make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to assure those affiliated with Synalima of our commitment to not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If you are a registered user, we may notify you via email of changes or updates made to this Policy.

This Policy applies to Synalima, and it governs all data collection and usage by us. Using our website (synalima.org), you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by companies that Synalima does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information.

This Policy will inform you of the following:

- What Personally Identifiable Information (PII) is collected from you through our website.
- Why we collect personally identifiable information and the legal basis for such collection.
- How we use the collected information and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- What security procedures are in place to protect against the misuse of your information.

#### Information We Collect

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or

provide you with any products or services. This website collects various types of information, such as:

• Information automatically collected when visiting our website, which may include cookies, third party tracking technologies and server logs.

In addition, Synalima may have the occasion to collect non-personal anonymous demographic information, such as age, gender, household income and race, as well as the type of browser you are using, IP address, device or type of operating system, which will assist us in providing and maintaining superior quality service.

# Why We Collect Information and For How Long

We are collecting your data for several reasons:

- To better understand your needs and provide you with the services you have requested.
- To fulfill our legitimate interest in improving our services and products.
- To send you promotional emails containing information we think you may like when we have your consent to do so.
- To contact you to fill out surveys or participate in other types of market research, when we have your consent to do so.
- To customize our website according to your online behavior and personal preferences.

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria:

- The length of time your personal information remains relevant.
- The length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations.
- Any limitation periods within which claims might be made.
- Any retention periods prescribed by law or recommended by regulators, professional bodies or associations.
- The type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

#### Use of Information Collected

Synalima does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third parties.

Synalima may collect and may make use of personal information to assist in the operation of our website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information to keep you informed of other possible products and/or services that may be available to you Synalima.

Synalima may also be in contact with you with regards to completing surveys and/or research questionnaires related to your opinion of current, potential, or future services that may be offered.

Synalima uses various third-party social media features including but not limited to <u>LinkedIn</u> and other interactive programs. Synalima also uses <u>Zeffy</u>, a third-party donation and customer relationship management system, to facilitate donations and manage end-user relationships. <u>Zeffy</u> may collect contributor information on behalf of Synalima.

Synalima utilizes Office 365 products, applications, and related services internally to facilitate organizational operations and provide access to learners and instructors. This includes, but is not limited to, the use of email, cloud storage, collaborative tools, and other educational resources provided by Office 365. Synalima ensures that all personal information processed through Office 365 is handled in accordance with our privacy policy and relevant data protection laws. For further information on how Microsoft handles data within Office 365, please refer to the Microsoft Privacy Policy for Office 365 and related Educational products <a href="https://example.com/here/beta/figures-new/beta/

These services may collect your IP address and require cookies to work properly, are governed by the privacy policies of the providers and are not within Synalima's control.

#### Disclosure of Information

Synalima may not use or disclose the information provided by you except under the following circumstances:

- As necessary to provide services or products you have ordered.
- In other ways described in this Policy or to which you have otherwise consented.
- In the aggregate with other information in such a way so that your identity cannot reasonably be determined.
- As required by law, or in response to a subpoena or search warrant.
- To outside auditors who have agreed to keep the information confidential.
- As necessary to enforce the Terms of Service on our website.
- As necessary to maintain, safeguard and preserve all the rights and property of Synalima.

# Non-Marketing Purposes

Synalima greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in Synalima products and services, or material changes to this Policy). In certain circumstances, we may use our website, or other public means to post a notice.

# Children under the age of 13

Synalima's website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database, or in the alternative, that verifiable parental consent is obtained for the use and storage of such information. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use this website.

# Unsubscribe or Opt-Out

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email to <a href="mailto:unsubscribe@synalima.org">unsubscribe@synalima.org</a>. If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. Synalima will continue to adhere to this Policy with respect to any personal information previously collected.

#### Links to Other Websites

Synalima may contain links to other websites ("Linked Sites"). The Linked Sites are not under the control of Synalima and Synalima is not responsible for the contents of any Linked Site, including without limitation any link contained in a Linked Site, or any changes or updates to a Linked Site. Synalima is providing these links to you only as a convenience, and the inclusion of any link does not imply endorsement by Synalima of the site or any association with its operators.

Certain services made available via Synalima are delivered by third party sites and organizations. By using any product, service or functionality originating from the Synalima domain, you hereby acknowledge and consent that Synalima may share such information and data with any third party with whom Synalima has a contractual relationship to provide the requested product, service or functionality on behalf of Synalima users and customers.

#### Notice to European Union Users

Synalima's operations are located solely within the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States. By providing personal information to us, you are consenting to its storage and use as described in this Policy.

# Security

Synalima takes precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (e.g. personally identifiable information), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the webpage.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers and servers in which we securely store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

Synalima also uses Secure Socket Layer (SSL) for authentication and private communications to build users' trust and confidence in the internet and website use by providing simple and secure access and communication of personal information.

# **Acceptance of Terms**

By using this website, you are hereby accepting the terms and conditions stipulated within this Privacy Policy Agreement. If you are not in agreement with our <u>Terms and Conditions</u>, then you should refrain from further use of our sites. In addition, your continued use of our website following proper notification or the posting of any updates or changes to our terms and conditions shall mean that you agree and accept such changes.

#### How to Contact Us

If you have any questions or concerns regarding this Privacy Policy as it relates to our website, please feel free to contact us at <a href="mailto:privacy@synalima.org">privacy@synalima.org</a>.