

# WEConnect International Privacy Policy

Effective Date: May 25, 2018

This Privacy Policy applies to [www.weconnectinternational.org](http://www.weconnectinternational.org) (the "Site"), which is owned and operated by WEConnect International ("WEConnect International," "we" or "us"). We may change this Privacy Policy from time to time. You should check the Site periodically to review our current Privacy Policy, which is effective as of the effective date listed above. Your use of the Site and submission of Personal Information online constitutes acceptance and understanding of the Privacy Policy, as in effect at the time of your submission to or use of the Site.

At WEConnect International, we recognize and respect your privacy. We act in accordance with global privacy principles and frameworks, including the OECD Guidelines on the protection of Privacy and Transborder Flow, the EU Privacy Directive, and General Data Protection Regulation (GDPR). This Privacy Policy explains how we collect, use and disclose personally identifying information ("Personal Information") and Business Profile Information you voluntarily provide through our Site. We may combine the information you provide to us with information we collect from you offline.

## **Types of Personal Information We Collect Through the Site**

You may browse our Site without creating an online account. However, if you register for our Services, we will ask you to provide certain information.. In general, we ask you to provide the following types of Personal Information through our Site:

*Applicant Information.* When you register for our services online, by submitting an application for certification or self-registration, we ask you to provide information about you and your business, including (but not limited to) your name, gender, ethnicity, job title, contact information, and other relevant information; and your business name and contact information.

*Newsletters.* If you sign up to receive our newsletters, you will provide your name and email address.

*Event Registration.* If you register for an event, you will be asked to for your name, email address, business name and other information depending on the type of event you have registered for. We may combine it with any other Personal Information you have provided to us.

*Donations.* If you make a donation, we will ask you to provide information about your donation, such as your name and contact information and the amount of your donation.

*Information We Collect Automatically.* We may use cookies, web beacons, and other similar technologies to collect information about you when you visit our Site. Specifically, we may collect the following information about your use of our Site via these technologies: your

browser type and operating system; web pages you view; links you click; your IP address; your interaction with the Site; length of time you are logged in to our Site; and websites visited before our Site. Please see the section “Cookies and Analytics” below for more information about our use of cookies. We may use the information gathered through these methods in anonymous or aggregated form to analyze ways to improve our Site or services. We may associate this information with the other Personal Information that you have provided to us.

### **Collection of Business Profile Information**

During the application process, in addition to Personal Information, WEConnect International will also ask you to provide your Business Profile Information. This includes industry, products, the age of your business, business revenues, statistics about women’s roles, information about ownership and control, and other information about the history and status of your business that is relevant to the assessment of your business as a women-owned business. This information does not include any personally identifying datapoints, such as names, emails, phone numbers, and addresses. WEConnect International reserves the right to retain this data for research purposes.

### **How We Use Information**

We use the information you provide to us for the following types of purposes:

- to connect you with others within our network of women business owners, multinational corporations, and business support organizations;
- to respond to your requests or inquiries, to communicate with you about your application, event registration or donations, and for similar customer-service-related purposes;
- to assess your application;
- to invite you to and administer events and programs;
- to process your payments and donations;
- to adjust our offerings or services to you and to tailor the information we send or display to you;
- to send you information that we believe you may find of interest, including to send you our newsletter and to solicit donations; and
- to improve our Site, offerings or services and to better understand how users access and use our Site and offerings, on an aggregated and individualized basis.

Notwithstanding anything else in this Privacy Policy, we also may use or aggregate non-personally identifying information about users for market analysis, research, marketing or other purposes.

### **How We Disclose Information**

We may disclose information you provided to us online to third parties for the following types of purposes:

- to our contractors or service providers (such as service providers who help us to administer our Site or process credit card payments) who provide services or perform functions on our behalf;

- to our affiliates and consultants who are required to treat your Personal Information in accordance with the Privacy Policy and the confidentiality obligations we impose on them;
- if you make a donation, we may, with your consent, share your name and contact information with our partners, including other non-profit organizations;
- if you consent, we may also share your Personal Information with other women's business support organizations within our network;
- in response to a subpoena or other legal process by a governmental entity or third party, or if otherwise required by law;
- "in a limited number of circumstances, WEConnect International may need to disclose data without your prior consent, including as needed to satisfy legal requirements, or to protect the rights or property of WEConnect International or others (including the enforcement of agreements or policies governing the use of the service)."

Notwithstanding anything else in the Privacy Policy, we may share aggregate or non-personally identifying information about users with third parties for marketing, advertising, research or other purposes.

### **Subject Access Requests**

You have the right at any time to request information regarding the use and disclosure of any data provided to WEConnect International, whether personally identifying data or business profile data. To request this information, please reach our Data Protection Officer through the email [privacy@weconnectinternational.org](mailto:privacy@weconnectinternational.org).

### **Removal of Personally Identifiable Data**

You have the right to remove any personally identifiable data from WEConnect International's Database at any time. To do so, please notify our Data Protection Officer at [privacy@weconnectinternational.org](mailto:privacy@weconnectinternational.org).

### **Cookies and Analytics**

When you interact with our Site, we strive to make your experience easy and meaningful. We or our third-party service providers may use cookies, web beacons, clear GIFs, and similar technologies to track user activity and collect Site data. We may combine this data with the Personal Information we have collected from you.

*Cookies.* We (or our third-party service providers) use cookies to track visitor activity on the Site and to administer our Site. A cookie is a text file that a website transfers to your computer's hard drive for record-keeping purposes. Our cookies assign a random, unique number to each visitor's computer. They do not contain information that would personally identify the visitor, although we can associate a cookie with any identifying information that is or has been provided to us while visiting our Site. We or our third-party service providers use cookies that remain on your computer for a specified period of time or until they are deleted (persistent cookies). These cookies record clickstream information (data reporting the URLs, or names of the pages, on our Site that have been visited). We may also use cookies that exist only temporarily during an online session (session cookies) – these cookies allow us to identify you temporarily as you move through the Site. Most browsers allow users to refuse cookies, but doing so may impede

the functionality of some portions of our Site.

*Web Beacons.* Web beacons are tiny graphics with a unique identifier, similar in function to cookies, that are used to track the online movements of Web users, or emails. In contrast to cookies, which are stored on your computer's hard drive, Web beacons are embedded invisibly on webpages or within emails, and may not be disabled or controlled through your browser. We or our third-party service providers may use web beacons to track Site activity. We may also use them within our HTML-based emails, to let us know which emails have been opened by recipients, allowing us to gauge the effectiveness of certain communications. For information on how to opt-out of receiving marketing communication from WEConnect International, please see the section "Newsletters & Marketing Communications" below.

*Third Parties.* As noted, we may also engage third parties, such as Google Analytics, to track and analyze Site activity on our behalf. To do so, these third parties may place cookies or web beacons to track user activity on our Site. We use the data collected by such third parties to help us administer and improve the quality of the Site and to analyze usage of the Site. We do not provide these third parties with your Personal Information.

### **Third-Party Links**

At times, our Site may contain links to other, third-party websites. Any access to and use of such linked websites is not governed by this Privacy Policy, but, instead, is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

### **Newsletters & Marketing Communications**

If you consent to receive marketing communications from us, we may send you emails from time-to-time, about information that we believe may be of interest to you, including our newsletter. If, at any time, you would like to stop receiving these e-mails, you may follow the opt-out instructions contained in any such e-mail. Please note that it may take up to 10 business days to process opt-out requests.

You may also receive periodic mailings from us at your postal address, requesting donations or sending you information on upcoming events, programs or other information.

### **How To Access to Your Personal Information**

In most cases, you have the right to access, and to amend where incorrect, the information you have provided to us, including the permissions you have given us to display certain information about

your profile. To review and correct personal data you have provided through the online application process, use your login and password to enter the WEConnect eCommunity, select profile, and click on the edit settings.

### **International Transfers of Personal Data**

WEConnect International is headquartered in the United States and has affiliates worldwide.

Any Personal Information you submit to us online will be transferred to and stored in the United States, by WEConnect International. In addition, the Personal Information collected on our Sites

may be transferred to, stored and processed in the European Economic Area or any other country in which WEConnect International or its subsidiaries and affiliates reside. We may also require other information from you during the application process including at or following a certification site visit in order for your business to qualify with respect to the WEConnect International certification criteria. By choosing to use our Sites and to provide us this data, you consent to any such transfer, storage and processing of information outside the jurisdiction in which you reside.

### **Security**

We use commercially reasonable physical, technical and administrative measures to protect the security of the Personal Information that we collect through the Site. Despite our efforts, no data security measures can guarantee 100% security all of the time.

### **eNetwork Access Rights**

Any access granted hereunder to the eNetwork is solely to individual authorized users who have a legitimate need for such access and who have been informed of their rights and obligations under this Privacy Policy. All authorized users provided with such access shall follow the terms of this Privacy Policy and all applicable laws and government regulations. Unauthorized access and improper use is prohibited. The database made available inside the eNetwork cannot be given away or sold in part or in whole. All eNetwork user activity is subject to monitoring and may be recorded by WEConnect International in accordance with our policies.

### **eNetwork Guidelines and Misuse**

The login to the eNetwork is designed to connect women business owners who meet the WEConnect International criteria to corporate members, other women business owners and resources and support.

To help with eNetwork confidentiality, authorized users may not disclose or share their access information with any other person, including user names or passwords. Authorized users must make every reasonable effort to prevent any situation to occur that could allow any person to get access to their password and must report to WEConnect International any actual or suspected breach of password access or any other unauthorized access. If your employment or business ownership status changes in a way that impacts your authorized user status, you must notify WEConnect International within 15 business days.

Your participation in on-line communications is not edited, censored, or otherwise controlled by WEConnect International. WEConnect International reserves the right to monitor content on the Site and to remove content, which WEConnect International, in its sole discretion, determines to be harmful or offensive. In order to maintain an informative and valuable service that meets the needs of the users of the eNetwork, we ask the users of the eNetwork to follow these rules of the road.

Appropriate uses of the eNetwork include:

- Individual communication with other users of the eNetwork
- Editing your profile to accurately represent your company's products and services
- Sharing best practices and resources individually or on discussion boards
- Using the information provided by corporations or other women business owners for market research and planning.

Sending spam -mass emails or messages - to members of the eNetwork for the purposes of promoting or advertising your company, another company, or any event or charity is not allowed. Marketing your company is appropriate in a targeted and respectful manner and for more information about reaching out to corporate members, please see the guide Steps to Promote Your Products and Services to WEConnect Members. If you have information that you believe should go to the entire WEConnect International network, please contact [info@weconnectinternational.org](mailto:info@weconnectinternational.org). Your request will be evaluated and a team member will contact you.

As a user of the eNetwork, you agree that:

- You may not post or transmit any message which is libelous, defamatory or which discloses private or personal matters concerning any person.
- You may not post or transmit any message, data, image or program which is indecent, obscene or pornographic.
- You may not post or transmit any message, data, image or program that would violate the property rights of others, including unauthorized copyrighted text, images or programs, trade secrets or other confidential proprietary information, and trademarks or service marks used in an infringing fashion.
- You may not interfere with other users use of the Site.
- You may not post or transmit any file which contains viruses, worms, "Trojan horses" or any other contaminating or destructive features.
- You may not post or transmit any message which is harmful, threatening, abusive or hateful.
- You may not post or transmit charity requests, petitions for signatures, chain letters or letters relating to pyramid schemes.
- You may not post or transmit any advertising, promotional materials or any other solicitation of other users of the Site for goods or services except in those areas (e.g., a classified bulletin board) that are designated for such purpose.
- You may not use the facilities and capabilities of the Site to conduct any activity or solicit the performance of any illegal activity or other activity, which infringes the rights of others. We reserve the right to revoke access to anyone that does not comply with our policies.

## **WE HAVE THE RIGHT TO TERMINATE**

We have the right to discontinue, suspend or terminate on our Site and/or your use of our Site at any time, including any time we determine, in our sole judgment, you, your use of our Site, your Content and/or any Posting you make does or may violate our Terms of Use, Privacy Policy and, in addition to any other rights and remedies we may have under these Terms of Use, or at law or

in equity, we have the right to: (i) refuse to allow you further Posting; (ii) remove or delete Postings; (iii) revoke your right to use our Site; (iv) use any technological, legal, operational or other means available to enforce our Terms of Use, including blocking specific IP addresses or deactivating

### **Changes to this Privacy Policy**

We may change this Policy from time to time and encourage users to review it on a regular basis.. We will post any changes to our policy to our Sites [www.weconnectinternational.org](http://www.weconnectinternational.org). If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by whatever method we deem appropriate, such as by highlighting the change on the Site or sending an email to you at the email address that you have registered with us.

### **Contact Us**

If you have any questions, comments or concerns about this Privacy Policy, please contact us at [privacy@weconnectinternational.org](mailto:privacy@weconnectinternational.org).