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JA Alumni Network Privacy Statement

Effective Date: February 15, 2022

The JA Alumni Network ("**Network**" or "**Site**") refers to our platform called 'Gather' (www.gather.jaworldwide.org) which is administered by JA Worldwide, Inc. (or "**JA**") and JA Regional Operating Centers or **JA ROC's** (which are the regional hubs through which the JA National Organizations – as defined below - operate) (hereinafter JA and JA ROC's are referred to as "**JA Organization**" or "**We**"). Through our Network, We want to build a global community for new participants or alumni who participate or participated to our events and registered to our Network ("**Alumni**"). The JA Organization believes that you should always know what "**personal data**" (i.e. any information relating to an identified or identifiable natural person) we collect from you and why and how we use it, and that you should have meaningful control over both.

We want you to make the best decisions about the personal data that you share with us and the other Alumni within the Network. This Privacy Statement describes how we collect and use personal data, and the rights and choices available to you regarding such data.

The JA Alumni Network Privacy Statement: Overview

This Privacy Statement applies to the Network, communications, surveys, events and other Alumni services ("**Services**") We provide through the Network.

We take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with this Privacy Policy and the statutory data protection regulations including the Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereafter referred to as the "**GDPR**").

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 into 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 dedicated to Alumni.

Do not give out your username or password to anyone. Additionally, please respect the privacy of other Alumni by refraining from giving out personal data 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..

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

Who is the responsible party for the processing of personal data on this website (i.e. the "controller")?

The controller is the entity that single-handedly or jointly with others makes decisions as to the purposes of and means for the processing of personal data.

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The personal data on the Network is processed by the operator of the website, namely JA Worldwide, whose contact information is provided below:

JA Worldwide, Inc |

131 Dartmouth Street, 3rd Floor, Boston, MA, USA, 02116

For the provision on the Services through the Network, we process your personal data jointly with other controllers, namely other JA ROCs which are part of the JA Organization:

JA Europe asbl

Rue Montoyer 46, 1000 Brussels

How do we collect your personal data?

We collect your personal data directly from you, as a result of your sharing of your personal data with us and/or of you visiting our Network and in particular :

- When you fill our form to create your profile on Gather or on other related platforms operated by the JA Organization and through which we provide our Services, including our events);;
- Through your use of our Services through the Network, including when you participate to our live or virtual events;
- Through information you provide on your profile in the Network (including links you provide to your social media profiles such as LinkedIn, Facebook and Instagram) or when you communicate with others on the Network;
- When you send us a request by e-mail, telephone, or fax;
- When you ask to receive our newsletter.

We and Google also use various technologies including cookies and similar tracking technologies, such as pixels and web beacons, to collect and store information when you use the Site.

What personal data do we collect when you register and use the JA Alumni Network?

To be able to build your Network profile and provide you with the Services, we may collect and process the following personal data about you

- Identification and Contact information : name*, email address*,country and region*, postal address, phone number, birthdate;
- Pictures;
- Professional information: such as previous and current occupations*, job titles, employers, industry*, sector;
- Education (such as your degrees/certifications and schools/universities you attend or have attended, including the JA programs you have followed);
- Skills;
- Personal and business interests;
- Social Media profiles such as LinkedIn, Facebook and Instagram;
- Network and connections: people, alumni groups* and pages you are connected to and how you interact with them across our Network, such as people you communicate with the most or groups you are part of. More generally, all information you post on the Network, such as resumes, job applications, event RSVPs, and comments on news articles;

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- Responses to online surveys or forms used for feedback, research, and product improvement.
- Electronic data: operating system, IP address, URL, referrer URL, IP address, device and browser characteristics.
- Connection and tracking data: cookies, the time at which the site was accessed, the pages accessed, time spent on each page, information about your visit and usage of the Site, the types of content you view or engage with, etc; and
- Transaction data: the date and amount that Alumni paid on the Network for the Services.

* The above personal data marked with an asterisk must mandatorily be provided to create an account on the Network.

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 on your profile and on the Network that is relevant to the stated purpose of the Network

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

As mentioned above, 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.

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 and in any case after obtaining your explicit consent for such processing.

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.

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Why do We use your personal data for the JA Alumni Network and other Services?

We will use your personal data only where required for the specific purposes described here below::

- To provide you with access to our Services through our Network, including (i) to create a global community so that you can stay connected to JA, JA National Organizations, JA ROCs, JA Alumni Groups, and other Alumni around the world, (ii) to enable other Alumni of the Network to search for and locate you via the Site's Directory search function, as well as to see your profile, (iii) to provide you with information regarding our Services, (iv) to assist you and answer your requests in relation to our Services.
- To improve our Services (including our Network) and the Alumni's experience.
- For IT management, including infrastructure management, business continuity and IT security.
- To personalize our Services and our Network and therefore provide you with a customized experience on the Site, including personalized Services, such as, suggested contacts, news, virtual or live events (including registration thereof), volunteer opportunities, employment opportunities, and interactive communications.
- To research and analyze the Site's users' demographics, interests, and behavior in an aggregated form, including to improve our Services and the experience for all Alumni, to measure the impact of participation in our events and communicate such impact measurements to donors and other stakeholders, to better understand and serve you and other Alumni.
- To contact you periodically with our newsletter, marketing communications (including, subject to your prior consent, from our business partners/sponsors), communications about events, publications, or employment opportunities with JA, JA National Organizations, JA ROCs 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 personaldata ?

We will process your personal data for the purposes set forth in this Privacy Statement based on:

- The necessity to fulfill our Terms of Use and provide the Services;
- The necessity to comply with our legal obligations;
- The necessity to fulfill our legitimate interests, including our interests in providing an innovative, personalized, safe, and profitable Service to our Alumni and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;
- Your consent, which you may revoke at any time through the settings. In particular, we use your consent to process your personal data for the purpose of taking your picture (that we may take during our events) and further using it on our social network pages and in the Network, for collecting information you allow us to receive through the cookies and other similar tools and to send you marketing communications.

With who do we share or might share your personal data ?

In the framework of the Network and for the purpose of providing you with our Services, we share or might share your personal data with the following categories of recipients :

- Alumni: given the specificities of the Network, your personal data/profile will be made ~~available to other~~ Alumni within the Network, through the Directory search function of the Network. 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 users by default, meaning all users (Alumni) of the Site can see this information. You can select to make information in your profile visible to only you, just your contacts, all users of the Site.
- JA Organization: Regardless of your privacy settings, JA and JA ROCs, will have access to your profile information.
- Our JA National Organizations: which are the country-based local organizations who deliver the programs (i.e. curriculum) and events to the students. These entities will receive your personal data when you register on the groups they administer on the Network.
- Administrators of Alumni groups: entities (which are not part of the JA Organization) that administer Alumni groups that you join on the Network.
- Our personnel: Access to the data is limited to those staff administrators who need to have access to the data in the context of their mission. The staff administrators concerned are contractually required to keep your data confidential and must comply with the technical instructions imposed by us in this respect. It may happen that administrators of groups on the Network will be external to our personnel. In such case, satisfying confidentiality agreements will be concluded.
- Service Providers: We will share your personal data with our service providers and in particular with our IT service providers such as:
 - Stripe Payments Europe, Ltd: our payment service provider.
 - KIT UNITED SAS ("Hivebrite") who is administering our Network.
 - 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: In specific and limited cases, we might share your personal data with business partners or sponsors for purposes related to the Services and the Network, such as organizing contests or providing you with advertising that may interest you. Any business partnerships that would require personal data will be set up for each individual to provide explicit consent and opt-in.
- Legal: We will share your personal data 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 data to a third-party acquirer if JA 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 data.

In which cases are we transferring your personal data outside the EEA?

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 Alumni that resides outside the EEA uses the Directory search function to find you and views the personal data in your profile, your personal data will, in effect, be transferred outside of the EEA. We have no control over other Alumni's access to your personal data.

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In particular, We may transfer your personal data out of the EEA for the purposes described in this Privacy Statement to our Service Providers, business partners/sponsors, as well as to our JA National Organizations and JA ROCs, located outside of the EEA.

We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed.

For transfers to non-EEA countries whose level of protection has not been recognized by the European Commission, we will sign the standard contractual clauses adopted by the EU Commission.

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](#).

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.

KIT UNITED SAS administers the Network. KIT UNITED SAS implements security safeguards designed to protect your data. KIT UNITED SAS regularly monitors its systems for possible vulnerabilities and attacks.

Your 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 cafe.

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 data?

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

What are your rights?

- **Right of access**

You can obtain information relating to the processing of your personal data and a copy of such personal data.

- **Revocation of your consent to the processing of data**

Some data processing operations are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

- **Right to object to the collection of data in special cases; right to object to direct advertising**

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In the event that data are processed on the basis of article 6(1) (F) GDPR (i.e. based on our legitimate interest), you have the right at any time to object to the processing of your personal data based on grounds arising from your unique situation. If you log an objection, we will no longer process your affected personal data, unless we are in a position to present compelling protection worthy grounds for the processing of your data, that outweigh your interests, rights and freedoms or if the purpose of the processing is the claiming, exercising or defense of legal entitlements (objection pursuant to article 21(1) GDPR). If your personal data is being processed in order to engage in direct advertising, you have the right to object to the processing of your affected personal data for the purposes of such advertising at any time. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will subsequently no longer be used for direct advertising purposes (objection pursuant to article 21(2) GDPR).

- **Right to log a complaint with the competent supervisory authority**

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory authority, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

- **Right to data portability**

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

- **Rectification and eradication of data**

You may also have a right to have your data rectified if it is inaccurate or eradicated (if one of the grounds of article 17 of the GDPR applies).

- **Right to demand processing restrictions**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data instead of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21(1) GDPR, your rights and our rights will have to be
- weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data based on article 18 of the GDPR, these data – with the exception of their storage – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons of the European Union or a member state.

In any case, please do not hesitate to contact us at any time by email at privacy@jeworldwide.org if you have questions about this or any other data protection related issues.

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