



## PRIVACY POLICY

Thanks for visiting Connecticut Institute for Social Entrepreneurship (referred herein as “CISE”). Please take a moment to read our privacy policy before using this website.

This Privacy Policy describes our policies and procedures on the collection, use, disclosure, and sharing of your personal information when you use this website.

UNDER NO CIRCUMSTANCE WE SHALL HAVE ANY ACCOUNTABILITY TO YOU FOR ANY LOSS OR DAMAGE AS A RESULT OF THE USE OF ANY INFORMATION PROVIDED ON THE WEBSITE. YOUR USE OF THE WEBSITE AND YOUR RELIANCE ON ANY INFORMATION ON THE WEBSITE IS COMPLETELY AT YOUR OWN RISK.

Our collection, use, disclosure, and processing of personal information about individuals will vary depending upon the circumstances. This privacy notice is intended to describe our overall privacy and data protection practices. In some cases, different or additional notices about our data collection and processing practices may be provided and apply to our processing of certain personal information.

### SECTION 1 - WHY WE COLLECT YOUR INFORMATION

We use the information, we collect in various ways, including:

- To provide, operate, and maintain our website.
- To improve, personalize, and expand our website.
- To understand and analyze how you use our website.
- To develop new courses, services, features, and functionality.
- To communicate with you, either directly or through one of our partners, including for user service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes.
- To send you emails.
- Find and prevent fraud.

### SECTION 2 - OUR COLLECTION OF PERSONAL INFORMATION

Personal information that we collect and the process will vary depending upon the circumstances. We collect personal information directly from individuals, automatically related to the use of the Services, for example, some of the ways we collect information are as follows:

- when you provide your contact information and send other personal information to us;
- when you complete or submit a form through CISE, for example, "Contact Us" or "More Information" forms;
- When you sign up for a user account;

We collect the following information that you provide to us, such as:

1. Name
2. Email Address
3. Physical Address
4. Phone Number
5. Date of Birth
6. Gender
7. Passport
8. Social Security Number
9. Photograph

### **Your Data Controller**

We are the data controller with respect to processing your data. This means that we decide how your personal data is processed and for what purposes. We know that you care how data about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly.

This Privacy Policy applies to activities by CISE and its affiliates and subsidiaries (collectively "Company" "we" or "us").

Please contact us at:

1000 Lafayette Blvd, Suite 1140, Bridgeport, CT 06604

Telephone : +1 (203) 727-6199

E-mail : [cise@connecticut.institute](mailto:cise@connecticut.institute)

### **Your Consent**

If you revoke your consent for the processing of Personal Information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity.

### **Your Choices**

You may, of course, decline to submit information through our website, in which case we may not be able to provide related services to you.

## SECTION 3 - HOW WE USE YOUR PERSONAL INFORMATION

While the purposes for which we may process personal information will vary depending upon the circumstances, in general, we use personal information for the purposes set forth below. Where General Data Protection Regulation (GDPR) or other relevant laws apply, we have set forth the legal bases for such processing in parenthesis.

- 1. Providing support and services:** including, for example, to provide services you request (and send related information), operate CISE to communicate with you about your access to and use of our services; to respond to your inquiries; to provide troubleshooting, fulfil your requests and provide technical support; and for other user service and support purposes.
- 2. Analyzing and improving our business:** including better understand how users' access and use CISE to evaluate and improve our services and business operations, and to develop new features, offerings, and services; to conduct surveys, and other evaluations, such as user satisfaction surveys; and for other research and analytical purposes.
- 3. Personalizing content and experiences:** including to provide or recommend features, content, social connections, and referrals; tailor content we send or display on CISE to offer customization and personalized help and instructions, and otherwise personalize your experiences.
- 4. Advertising, marketing, and promotional purposes:** including to reach you with more relevant ads and to evaluate, measure, and improve the effectiveness of our ad campaigns; to send you newsletters, offers, or other information we think may interest you; to contact you about CISE or information we think may interest you;
- 5. Defending our legal rights:** including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.
- 6. Complying with legal obligations:** including to comply with the law, our legal obligations and legal process, such warrants, subpoenas, court orders, and regulatory or law enforcement requests.

## SECTION 4 - DISCLOSURE OF PERSONAL INFORMATION

We may disclose the personal information that we collect about you as set forth below or as otherwise described at the time of collection or sharing.

1. **Service providers:** We may disclose personal information with third-party service providers who use this information to perform services for us, such as hosting providers, instructors, advisors, consultants, and user service and support providers.
2. **Third Parties:** We may employ other companies and individuals to perform functions on our behalf. Examples include sending postal mail and e-mail, removing repetitive information from user lists, analyzing data, providing marketing assistance, processing payments, transmitting content, and providing user service. These third-party service providers have access to personal information needed to perform their functions but may not use it for other purposes.
3. **Business transfers:** We may disclose or transfer personal information as part of any actual or contemplated merger, sale, and transfer of our assets, acquisition, financing, or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted before such event where permitted by law.
4. **Legally required:** We may disclose personal information if we are required to do so by law (e.g., to law enforcement, courts, or others, e.g., in response to a subpoena or court order).
5. **Protect our rights:** We may disclose personal information where we believe it necessary to respond to claims asserted against us or, comply with legal process (e.g., warrants), enforce or administer our agreements and terms, for fraud prevention, risk assessment, investigation, and to protect the rights, property, or safety of us, our clients and users or others.

## SECTION 5- COOKIES

Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usages of websites, such as time spent on the websites, pages visited, language preferences, and other anonymous traffic data. You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, this may affect the functioning of CISE unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Service.

## SECTION 6- LOG FILES

Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version, and internet browser type and version. This information is gathered automatically and stored in log files.

## **SECTION 7- THIRD-PARTY ANALYTICS TOOLS**

Our website may use automated devices and applications operated by third parties, such as Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of the website and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources.

## **SECTION 8- DO-NOT-TRACK SIGNALS**

Please note that our website does not recognize or respond to any signal which your browser might transmit through the so-called 'Do Not Track' feature your browser might have. If you wish to disable cookies on our website, you should not rely on any 'Do Not Track' feature your browser might have.

## **SECTION 9- SECURITY**

We use technical, administrative, and physical controls in place to help protect Personal Information from unauthorized access, use, and disclosure. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

## **SECTION 10- DO NOT SELL MY DATA**

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent, or otherwise share for marketing purposes your Personal Information with third parties without your consent. We will retain your personal information for the period necessary to fulfil the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law. We may retain personal information for longer where required by our legal and regulatory obligations, professional indemnity obligations, or where we believe it is necessary to establish, defend or protect our legal rights and interests or those of others. With respect to the data and files we handle as a processor, we retain this personal information in accordance with our clients' instructions.

## **SECTION 11- CCPA PRIVACY RIGHTS**

Under the CCPA, among other rights, California consumers have the right to:

- Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.
- Request that a business deletes any personal data about the consumer that a business has collected.

- Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

## SECTION 12- CALIFORNIA ONLINE PRIVACY PROTECTION ACT (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy.

According to CalOPPA we agree to the following:

- Users can visit our Platform anonymously
- Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our Platform.
- Our Privacy Policy link includes the word 'Privacy', and can be easily be found on the page specified above.

## SECTION 13- GDPR DATA PROTECTION RIGHTS

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

1. **Right to access:** If you can prove your identity, you have the right to obtain information about the processing of your data. Thus, you have the right to know the purposes of the processing, the categories of data concerned, the categories of recipients to whom the data are transmitted, the criteria used to determine the data retention period, and the rights that you can exercise on your data.
2. **Right to rectification of your personal data:** Inaccurate or incomplete personal data may be corrected.
3. **Right to erasure (or "right to be forgotten"):** You also have the right to obtain the erasure of your personal data under the following assumptions:
  - Your personal data are no longer necessary for the intended purposes;
  - You withdraw your consent to the processing and there is no other legal ground for processing;
  - You have validly exercised your right of opposition;
  - Your data has been illegally processed;
  - Your data must be deleted to comply with a legal obligation. The deletion of data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.
4. **Right to limitation of processing:** In certain cases, you have the right to request the limitation of the processing of your personal data, especially in case of dispute as to the accuracy of the data, if the data are necessary for the context of legal proceedings or the time required to verify that you can validly exercise your right to erasure.

5. **Right to object:** You have the right to object at any time to the processing of your personal data for direct marketing purposes. We will stop processing your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over your right to object.
6. **Right to data portability:** You have the right to obtain any personal data which you have provided us in a structured, commonly used, and machine-readable format. You are then free to transfer this data to a similar service provider.
7. **Right to withdraw your consent:** You may withdraw your consent to the processing of your personal data at any time, for example for personalized marketing communication purposes.

## SECTION 14- THIRD-PARTY WEBSITES

The Services may contain links to third-party services. We do not own, operate, or control the websites of third parties, including those of independently owned and operated franchisees. Accordingly, this Policy does not apply to any services maintained or operated by third-parties. When you click on those links, you will go to a third-party website where you will be subject to that service's privacy policy or similar statement and terms of use, and we encourage you to read that policy statement. We are not responsible for the privacy practices of other services, and we expressly disclaim any liability for their actions, including actions related to the use and disclosure of personal information by those third parties.

## SECTION 15- CHANGES TO THIS POLICY

We may amend this Policy at any time. If we make any material change in how we collect, use, disclose or otherwise process personal information, we will prominently post a notice regarding such change on the Services. Where required to do so by law, we may seek your prior consent to any material changes we make to this Policy.