

## Privacy Statement

This Privacy Statement discloses the privacy practices for [www.startfeelingfree.com](http://www.startfeelingfree.com). By using this website, you are consenting to our collection and use of information in accordance with this Privacy Statement.

### **What information do we gather about you?**

We and our third-party vendors collect certain information regarding your use of [www.startfeelingfree.com](http://www.startfeelingfree.com), such as your IP address and browser type. Your session and the pages you visit on our website may be tracked, but you will remain anonymous. We may use your IP address to identify the general geographic area from which you are accessing our website. We connect data from different systems but do not link IP addresses to any personal information. We may also collect other information as described in this policy.

When you access our website, we may collect and process the following types of information from you: **“Personal Information”** is any information that we can reasonably use to identify you. If you are located in the European Economic Area (EEA), Personal Information includes all Personal Data as defined under EEA laws.

**“Sensitive Personal Information”** includes special categories of Personal Information (e.g., racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health, and data concerning a natural person’s sex life or sexual orientation) for which applicable law provides enhanced protections.

**The table below describes the Personal Information and Sensitive Personal Information that we collect, why we collect it, and our legal basis for processing it.**

Purpose of Processing	Categories of Personal Information	Legal Basis
As part of online admissions process, we collect applicant Personal Information to evaluate applications. We also may obtain Personal Information from third parties, such as other schools, references, family members, and education partners as part of an application package.	Name, address, contact details, race/ethnicity, demographic information, educational history, reference letters, and other relevant information as part of the application package.	<i>Legitimate Interest:</i> Personal Information collected through the application is necessary to evaluate candidates and for our internal statistical and analytics purposes. <i>Consent:</i> Processing of Sensitive Personal Information for purposes stated above
To support course registration	Name, Startfeelingfree Unique ID, contact information	<i>Legitimate Interest:</i> Personal Information collected for matriculated students, staff, faculty and members of the public, as appropriate for the course, to register in courses or classes
To provide online training and educational programs	Name, Startfeelingfree Unique ID, contact information, demographic information	<i>Legitimate Interest:</i> To facilitate provision of on-line education courses to public, as appropriate for the course
To enroll interested individuals in research opportunities	Name, contact information	<i>Legitimate Interest:</i> Upon request from the individual, inform registrants about research opportunities
To process employment applications	Name, Startfeelingfree Unique ID (if available), demographic information, resumes	<i>Legitimate Interest:</i> For individuals interested in employment opportunities, processing applications
To process visa applications	Name, demographic information, financial information, passport number	<i>Legal Requirements</i>
To receive donations	Name, contact information, payment information	<i>Legitimate Interest:</i> To collect and process donations/gifts and donor information
To receive brochures or other information	Name, contact information	<i>Legitimate Interest:</i> To send brochures or other requested information
To purchase tickets to events	Name, Startfeelingfree Unique ID (if available), contact information	<i>Contract:</i> To process ticket payment for a variety of events
For event registration	Name, Startfeelingfree Unique ID (if available), contact information	<i>Legitimate Interest:</i> To process registration for sports, cultural, educational and other events
To purchase parking passes and permits	Name, Startfeelingfree Unique ID, contact information	<i>Contract:</i> To facilitate payments for parking passes and permits

To submit requests for services (e.g., IT, help desk, help line, etc.)	Name, Startfeelingfree Unique ID, contact information	<i>Legitimate Interest:</i> To process service requests from students, staff and faculty <i>Contract:</i> If there is a contract that governs your use of such services, Personal Information is processed pursuant to that contract
Website account registration	Name, contact information, alumni status	<i>Legitimate Interest:</i> For websites that require registration for access, to facilitate the registration
Travel sites	Name, Startfeelingfree Unique ID, contact information, passport number, loyalty membership information, emergency contacts	<i>Legitimate Interest:</i> To facilitate travel arrangements and coordination for students and affiliated travellers through Startfeelingfree programs <i>Contract:</i> If there is a contract that governs your use of travel sites, Personal Information is processed pursuant to that contract

### Interest Based Advertisements

Sometimes, our website engages in online interest-based advertising to enhance your experience and show you advertisements that might interest you. Like many organizations, we and our advertising partners display tailored interest-based advertising using information you make available to us when you interact with our site. Interest-based ads, also sometimes referred to as personalized or targeted ads, are displayed to you based on information from activities such as searching on our sites or visiting websites that contain our content or ads. We do this using a variety of digital marketing networks and ad exchanges, and we use a range of advertising technologies like web beacons, pixels, ad tags, cookies, and mobile identifiers.

### Sharing your personal information

We share your information internally to facilitate and manage the purposes listed above. This includes third parties whom we engage to process your Personal Information on our behalf for the purposes stated above, such as vendors who help us with our marketing, application processing, and web hosting. Startfeelingfree may also share your personal data with government and law enforcement agencies or regulators to 1) comply with a legal process, subpoena, order or other legal or regulatory requirement applicable to us; 2) enforce our terms of use or other policies; or 3) pursue available legal remedies or defend against legal claims. Other third parties as you may so request as permitted by this and other policies and applicable laws and regulations. Startfeelingfree will not sell any personal information to third parties for their use in direct marketing, advertising, or promotion of their products or services.

### Non-personal information that we may collect

Standard, non-personally identifiable internet log information such as browser type and navigation to various parts of the Sites, in an aggregated form, is collected for analytical purposes to improve the browsing experience of our Sites, update relevant content and improve the overall design.

### European Economic Area (EEA) Data Subject Rights

If you are an individual located in the EEA only, you will have the following rights with regard to your Personal Data:

1. Right of access: You may request details of your Personal Information that we hold. We will confirm whether we are processing your Personal Information and we will disclose

supplementary information including the categories of Personal Information, the sources from which it originated, the purpose and legal basis for the processing, the expected retention period, and the safeguards regarding Personal Information transfers to non-EEA countries, subject to the limitations set out in applicable statutes, regulations and other laws.

2. Right of correction: We will comply with your request to edit and update incorrect Personal Information promptly.
3. Right to be forgotten: At your request, we will delete your Personal Information promptly if:
  - it is no longer necessary to retain your Personal Information;
  - you withdraw the consent which formed the basis of your Personal Information processing;
  - you object to the processing of your Personal Information and there are no overriding legitimate grounds for such processing;
  - the Personal Information was processed illegally; or
  - the Personal Information must be deleted for us to comply with our legal obligations.

We will inform any third parties we might have shared your Personal Information with of your deletion request.

We will decline your request for deletion if processing of your Personal Information is necessary:

- to comply with our legal obligations;
  - in pursuit of a legal action;
  - to detect and monitor fraud; or
  - for the performance of a task in the public interest.
4. Right to restrict processing of your Personal Information: At your request, we will limit the processing of your Personal Information if:
    - you dispute the accuracy of your Personal Information;
    - your Personal Information was processed unlawfully and you request a limitation on processing, rather than the deletion of your Personal Information;
    - we no longer need to process your Personal Information, but you require your Personal Information in connection with a legal claim; or
    - you object to the processing pending verification as to whether an overriding legitimate ground for such processing exists.
  5. Right to notice related to correction, deletion, and limitation on processing In so far as it is practicable, we will notify you of any correction, deletion, and/or limitation on processing of your Personal Information.
  6. Right to data portability: At your request, we will provide you free of charge with your Personal Information in a structured, commonly used and machine readable format, if: (i) you provided us with Personal Information; (ii) the processing of your Personal Information is based on your consent or required for the performance of a contract; or (iii) the processing is carried out by automated means.
  7. Right to object: Where we process your Personal Information based upon our legitimate interest then you have the right to object to this processing.
  8. Right not to be subject to decisions based solely on automated processing: You will not be subject to decisions with a legal or similarly significant effect (including profiling) that are based solely on the automated processing of your Personal Information, unless you have given us your explicit consent or where they are necessary for a contract with us.
  9. Right to withdraw consent: You have the right to withdraw any consent you may have previously given us at any time. If you withdraw your consent, this will not affect the lawfulness of our collecting, using and sharing of your Personal Information up to the point in time that you withdraw your consent. Even if you withdraw your consent, we may still use your information that has been fully anonymized and does not personally identify you.
  10. Right to complain to a supervisory authority: If you are not satisfied with our response, you have the right to complain to or seek advice from a supervisory authority and/or bring a claim against us in any court of competent jurisdiction.

If you wish to contact us in connection with the exercise of your rights listed above, please email us at [info@startfeelingfree.com](mailto:info@startfeelingfree.com). We will respond to your written request without unreasonable delay and in

accordance with any deadlines imposed by law. Unless we notify you at the time of your request, we will not charge you any fee in connection with the exercise of your rights.

**Storage of Personal Information**

We keep your Personal Information for as long as needed to fulfill the particular purpose for which it was collected. We may also retain your records if legally required or to fulfill a legitimate interest.

**Updates to this Statement**

Startfeelingfree reserves the right to modify this Privacy Statement at any time. Prior to changes to the Privacy Statement, we will provide you notice, which shall be available at [www.startfeelingfree.com](http://www.startfeelingfree.com), prior to the effective date of any notice. Your continued use of the site after any change in this Privacy Statement will constitute your acceptance of such change.

**Contact Us**

For more information on how we collect and process your Personal Information, or if you have any complaints please contact [info@startfeelingfree.com](mailto:info@startfeelingfree.com).

**Effective Date**

The effective date of this policy is           .