



EXCELERATE PRIVACY NOTICE

Last Updated on 2-OCT-2023

These Privacy Policy constitute a legally binding agreement made between you, whether personally or on behalf of an entity (“you”) and Excelerate (“Company“, “we“, “us“, or “our“), concerning your access to and use of the <https://4excelerate.org> website as well as any other media form, media channel, mobile website or mobile application related, linked, or otherwise connected thereto (collectively, the “Site”). You agree that by accessing the Site, you have read, understood, and agreed to be bound by all of these Privacy Policy.

A. General Provisions

1. Global applicability and region-specific disclosures.

This privacy notice is designed to apply to our website visitors, users of our Services and other companies and users on a global basis. Therefore, section A applies to any processing of personal information worldwide.

We may choose or be required by law to provide additional disclosures relating to the processing of personal information in certain countries, regions or states. Please refer below for disclosures that may be applicable to you:

- **Europe**

The processing covered by the Europe-specific privacy disclosures contained in section B include our processing of personal information relating to individuals in the European Union, the UK, Switzerland, Liechtenstein, Norway and Iceland - all of which will, for the purpose of this privacy notice, be defined as “**Europe**” - if we offer goods or services to such individuals or monitor their activities in Europe. Please see Section B in this Privacy Notice titled “Additional Europe-Specific Privacy Disclosures” for additional Europe-specific privacy disclosures.

- **California**

If you are a resident of the State of California in the United States, please see Section C in this Privacy Notice titled “Additional California-Specific Privacy Disclosures” for additional privacy disclosures specific to California containing information about the processing of your personal information and the rights granted to you by California law.

2. **What is personal information?**

When we use the term “**personal information**” in this privacy notice, we mean information that identifies, relates to, describes, is capable of being associated with or could reasonably be linked, directly or indirectly, to you. It does not include aggregated information that is maintained in a form that is not capable of being associated with or reasonably linked to you.

3. **What personal information do we collect?**

In the context of rendering our Services, we may collect personal information about you. This personal information regularly includes the following:

- **If you register for our Services:**We may in particular collect and process: Your name, email address, university, degree, year in which you started going to university, your level of study (e.g., undergraduate, postgraduate, diploma, certificate), information on your major(s), working rights, working preferences (e.g. the city/ies you wish to work in) the year you (expect to) graduate, gender, photograph, password, how you heard about us.
- **If you submit work in one of our learning programs:**We may store the work product you have submitted, any feedback you provide on the program, information on whether or not you are happy for us to share the data you have provided to us with the organization that hosts the learning program you have participated in, and information on when you accepted our terms of use and – to the extent necessary – whether your parent/legal guardian has consented to your participation in a program.
- **If you use your account:**We may collect the data as set out under “If you register for our Services”. You may decide to amend or delete this data in your account at any time. We may also collect information on the Service you use.
- **If you contact us (via our website, social media channel, email or letter), e.g., for a support request:**We may collect your name, email address and information on our communication with you, and any additional information you provide us with.
- **If you only use our Websites:**your device ID, device type, model and manufacturer, operating system brand and model, approximate geo-location information based on your IP address, computer and connection information such as the device type, browser data including browser type and language, operating system, site preferences and information on your usage of our website including pages you view, the links you click and other actions you take on the Services and referring/exit pages and URLs, IP address and standard web log information.
- **If you are included in our marketing campaigns:**We may send you marketing communication via email, mail and social media channels. In this context, we may in particular collect and process your name, email

address, address, marketing campaign information such as the newsletter option you have selected and your reaction to our marketing and your interest in our Services.

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4. **How do we collect your personal information?**

The personal information is collected in many ways and may include:

- **Personal information you provide to us.**

Most of the personal information we receive comes to us voluntarily from our users in the course of registering for or using our Services, and communicating with us, or signing up for email or other communication lists.

You are free to choose which personal information you want to provide to us or whether you want to provide us with any personal information at all. However, some personal information, such as your name, address, and information on your requested Services may be necessary for the performance of our contractual obligations. Without providing this personal information, you will not be able to use certain Services or enter into a contract with us.

- **Personal information collected via technology.** As you use our Services, we may collect information automatically, such as log information and through the use of cookies or other tracking technologies.

- **Personal information we receive from others.** We may receive personal information about you from third parties such as social media sites (in particular if you use the single Sign-On mechanisms to sign-in), or partner institutions.

5. **Why do we collect and use your personal information?**

The reasons for using your personal information may differ depending on the purpose of the collection. Regularly, we use your personal information for the following purposes:

- **Providing our Services.** If you use our Services or if you contact us to request our Services, we use your personal information to provide you with these Services and information. This includes, in particular, to facilitate your enrolment and participation in our learning programs.

- **Pursue our business interests.** The usage of your personal information may also be necessary for our own business interests. For example, we may use some of your personal information to evaluate and review our business performance, improve and optimize our Services, conduct research, provide advertising and send technical notices, updates and security alerts, or to identify potential cyber security threats. We may use your personal information for marketing purposes, for example, to send you relevant product updates and to

qualify and manage the customer relationship. If necessary, we may also use your personal information to pursue or defend ourselves against legal claims.

- **Purpose for which consent has been provided.**In some cases, we may ask you to grant us separate consent to use your personal information, such as where we would like to share your personal information with our partner organizations who host our learning programs. If you have granted us consent to use your personal information, we will use it only for the purposes for which you have granted your consent.
- **Comply with legal obligations.**We are obligated to retain certain information because of legal requirements, for example, tax or commercial laws, or we may be required by law enforcement to provide personal information on request.

6. **With whom do we share your personal information?**

As required in accordance with how we use it, we will share your personal information with the following third parties:

- **Our partner organizations hosting learning programs.**We may share the work product that you submit in relation to a specific program with the partner organization that hosts this learning program, along with the data that we collect as set out under section 4 above titled “If you register for our Services” except for the password and only to the extent you have provided this data to us. Where we rely on consent in this respect, you will be specifically asked to provide consent prior to any sharing of your personal information.
- **Service providers and advisors.**We may use third party vendors and other service providers. Such services may include marketing campaign services, providing mailing or email services, tax and accounting services, conducting rewards, surveys or contests, performing customer service, performing data enhancement services, performing fraud prevention services, bug fixing support, performing web hosting services or providing analytic services, including analysis so that we can better understand your preferences and interests, personalize your experience and enhance the products and services. Any such service providers will by appropriate data processing agreements be bound to only process the data on Excelerate’s behalf and under its instructions, unless such service providers and advisors act as their own controllers (e.g., in the case we seek advice from lawyers and tax consultants).
- **Law enforcement, regulators and other parties for legal reasons.**Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or

(c) to exercise or protect the rights, property or personal safety of Excelerate's employees, our visitors or others.

- **Otherwise with consent.** We may disclose an individual's personal information to certain other third parties with that individual's consent.

7. **How do we protect your personal information?**

We implement a variety of security measures designed to maintain the safety of your personal information when you use our Services.

However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any personal information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose personal information may have been compromised, such notification will be made having regard to the nature of the personal information involved and may include email communications, written correspondence, or public statements and take other steps in accordance with any applicable laws and regulations, such as notify competent data protection authorities.

8. **Links to other websites and services.**

Our Services may contain features of our business partners, advertisers and social media sites and links to and from their third-party websites and our users may post links to third-party websites, such as Facebook, LinkedIn, Twitter, Tik Tok, Instagram and YouTube. If you follow a link to any of these websites or use these features, please note that these websites and features are governed by the privacy notices of these third parties and that we do not accept any responsibility or liability for their notices. We strongly recommend that you read their privacy notices and terms of use to understand how they collect, use, share and otherwise process personal information. We are not responsible for the privacy practices or the content on the websites of third-party sites.

9. **Children's privacy.**

Some of our Services may be open to individuals between the ages of 13-16 years old. If you are currently between the ages of 13 and 16, we will obtain consent from your parent/legal guardian during the registration process to the extent necessary. If we rely on consent for the processing of personal information, you may withdraw your consent at any time. Please see the

section below titled “Deny or withdraw of consent” for further information. If a user merely uses our website, we may process personal information relating to that person as described above. Thus, we automatically collect personal information of users between the ages of 13 and 16 if they browse on our website. However, we cannot link this data to a specific person but only to an identifier (cookie) that does not allow us to identify the age of the individual.

Note that we do not knowingly collect or solicit any personal information from anyone under the age of 13 on or through our Services. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us by using the contact details set out in the “How to contact us” section below.

For California-specific information on children’s privacy, please see our section “Additional California-specific information on children’s privacy” below.

10. **What rights and choices do you have?**

We want you to understand your rights and choices regarding how we may use your personal information. Depending on how we use your personal information, these rights and choices may include the following:

- **Access, correction and deletion.** Upon request, Excelerate will provide you with information about whether we hold any of your personal information. You may access, correct, and delete the personal information stored on your account using the account settings in your user profile. However, you may also contact us for any access, correction and deletion request, using the contact details set out in the section below titled “How to contact us”. We will respond to your request within a reasonable timeframe.
- **Cookies settings and preferences.** You may disable cookies and other tracking technologies through the settings in your browser. If you have provided consent to use marketing cookies and similar Tracking Technology or would like to learn more about how to avoid Tracking Technology, please see the section below titled “How do we use cookies and other Tracking Technology?”.
- **Marketing preferences.** If you have consented to receiving marketing communication (e.g., by signing up for our newsletters), you may easily withdraw your consent at any time with effect for the future. You can also opt out from receiving marketing communication if we do not rely on consent. You can withdraw your consent or opt out from receiving marketing communication via or by using the link provided to you at the end of each promotional communication. You may also contact us using the contact details set out in our section above titled “How to

contact us” to request that we remove you from the relevant marketing list.

- **Deny or withdraw your consent.** We may work on the basis of consent, in particular in relation to sales and marketing campaigns. For example, if you sign up to our marketing communication via email, you allow us to send marketing communication to you, or when our marketing partners provide us with your email address, we will process your data to the extent covered by your consent. We will also ask for your consent before we disclose the personal information you provided to us to our partner organizations offering the relevant learning program. If you have granted us consent to use your personal information, we will use it only for the purposes for which you have granted your consent. You are free to deny your consent and the denial will have no negative consequences for you. You are also free to withdraw your consent at any time with effect for the future without negative consequences for you. However, we will not / no longer be able to provide you with the Services to which this consent relates. If you want to learn about your options regarding withdrawing your consent to receive marketing communication specifically, please see our section “Marketing Preferences” above. If you want to learn more about your options to avoid Tracking Technology, please see our section above titled “How do we use cookies and other Tracking Technology?”. To withdraw your consent in other cases, please contact us using the contact details set out in our section below titled “How to contact us”.
- **Europe-specific rights.** For further Europe-specific rights, please see our section below titled “Additional Europe-specific disclosures”.
- **California-specific rights.** For further California-specific rights, please see our section below titled “Additional California-specific disclosures”.

11. **Online privacy notice updates.**

We may make changes to our privacy notice from time to time and will indicate these by changing the “Last Updated” date at the beginning of this privacy notice. Please review our policies regularly, as updated policies will apply to your future use of our Services.

B. Additional Europe-specific disclosures

1. **Scope of the disclosure.**

These Additional Europe-specific disclosures supplement the information contained in our privacy notice above to comply with the requirements under applicable data protection law in Europe, in particular the General Data Protection Regulation (“**GDPR**”). Unlike the generally applicable section A. of this privacy notice, these Additional Europe-specific disclosures apply only to our processing of personal information of individuals in Europe.

2. **Legal bases based on which we collect and use your personal information.**

Regularly, we use your personal information based on the following legal grounds according to the GDPR and the Data Protection Act 2018:

- **Performance of our contractual services or prior to entering into a contract with you.** If you use Services from Excelerate or if you contact us to request our Services, we use your personal information to provide you with these Services.
 - **Justified by our legitimate interests.** The usage of your personal information may also be necessary for our own business interests. For example, we may use some of your personal information to evaluate and review our business performance, improve and optimize our Services, conduct research, provide advertising and send technical notices, updates and security alerts, or to identify potential cyber security threats. We may use your personal information for marketing purposes, for example, to send you relevant product updates and to qualify and manage the customer relationship. If necessary, we may also use your personal information to pursue or defend ourselves against legal claims. Please also see our section above titled “What are Cookies and other Tracking Technologies used for?” for further regarding the purposes of use in relation to cookies and other tracking technology.
 - **Consent.** In some cases, we may ask you to grant us separate consent to use your personal information. Please see our section above titled “What rights and choices do you have?” regarding the choices and rights you have in this respect.
 - **Compliance with legal obligations.** We are obligated to retain certain personal information because of legal requirements, for example, tax or commercial laws, or we may be required by law enforcement to provide personal information on request.
3. We do not use your personal information for automated individual decision-making.

4. **How long do we keep your personal information?**

We will store personal information until your account is active. You can delete your personal information at any time in the user control panel. In case you choose to delete your personal information, that will be replaced by dummy data in case required for analytics in the future. We store your personal information for this length of time to fulfil the purposes for which we collect the

personal information, and in accordance with our legal obligations and legitimate business interests.

If you signed up for our promotional emails, we will delete the respective personal information if you unsubscribe from receiving our promotional emails. However, we will store your email address in a blacklist to ensure that you will not receive any further communication.

5. **Europe-specific rights**

Subject to the applicable law in your jurisdiction, you have the following rights in respect to your personal information that we hold:

- **Right of access.** The right to obtain access to your personal information.
 - **Right to rectification.** The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.
 - **Right to erasure.** The right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
 - **Right to restriction.** The right to obtain restriction of the processing undertaken by us on your personal information in certain circumstances, such as, where the accuracy of the personal information is contested by you, for a period of time enabling us to verify the accuracy of that personal information.
 - **Right to portability.** The right to portability allows you to move, copy or transfer personal information easily from one organization to another.
 - **Right to object.** You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. You can object to marketing activities for any reason whatsoever.
6. If you wish to exercise one of these rights, please contact us by using the contact details set out in the section above titled “How to contact us”. In addition to the foregoing listed rights, you also have the right to **lodge a complaint** with your local data protection authority. However, we encourage you to first reach out to us by using the contact set in the section above titled “How to contact us” so that you have an opportunity to address your concerns directly and find a solution together before you do lodge a complaint.

C. Additional California-specific disclosures

1. **Scope of notice.**

These Additional California-specific disclosures (the “**CA Notice**”) supplements the information contained in the privacy notice above and

applies solely to individual residents of the State of California (“**consumers**” or “**you**”).

This CA Notice provides additional information about how we collect, use, disclose and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”).

Unless otherwise expressly stated, all terms in this CA Notice have the same meaning as defined in our privacy notice above or as otherwise defined in the CCPA.

2. **General remarks on personal information disclosures.**

When we use the term “**personal information**” in this CA Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer or household.

For the purposes of this CA Notice, the term personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated information that is maintained in a form that is not capable of being associated with or linked to you.
- Information excluded from the CCPA's scope, such as:
 - Information reflecting a communication or a transaction between us and a representative of another legal entity in the context of conducting due diligence regarding, or providing or receiving, a product or service to or from that legal entity.
 - Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.
- Information relating to our job applicants, employees, contractors and other personnel.

3. **California-specific rights.**

As a California resident, you may be able to exercise the following rights in relation to the personal information about you that we have collected (subject to certain limitations at law):

- **Right to know:** The right to request any or all of the following information we have collected and disclosed about you in the last 12 months:
 - The categories and specific pieces of personal information we have collected about you;
 - The categories of sources of the personal information;
 - The purposes for collecting or, if applicable, selling the personal information;

- The categories of personal information we have sold about you (if any), and the categories of third parties to whom this information was sold; and
 - The categories of personal information we have disclosed for a business purpose and the categories of recipients.
 - **Right to deletion.** The right to request the deletion or erasure of personal information we have collected about you, subject to certain exceptions.
 - **Right to opt out.** The right to direct us not to sell personal information we have collected about you to third parties now or in the future.
 - **Right to opt in.** If you are under the age of 16: The right to authorize us, or have your parent or guardian authorize us, to sell personal information about you.
 - **Non-discrimination.** The right to be free from discrimination for exercising any of the rights described above. Please note, however, that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may not be able to provide our services and offerings to individuals who exercise these rights, or to otherwise engage with such individuals going forward.
4. **How to exercise your California-specific rights.**
- To exercise your right to know or right to deletion. To exercise your right to know and/or right to deletion, please submit a request by:
- Emailing the email address provided in the “How to contact us” section in this privacy notice with the subject line “California Rights Request,”;
5. Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally require you to (1) log into your account if you have one, or (2) the matching of sufficient information you provide us to the information we maintain about you in our systems. This process may require us to request additional personal information from you, including, but not limited to your email, address, and/or date of last interaction with customer service. We will only use personal information provided in connection with a Consumer Rights Request to review and comply with the request.
- In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your personal information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

Virtual Meeting Safeguarding Policy

We want all of our online sessions or team meetings to be effective and productive. To better protect your confidential meetings, the following are the rules which must be adhered to.

1. Purpose

The purpose of this Safeguarding Measures Policy is to establish guidelines and procedures to ensure the safety, security, and integrity of virtual meetings conducted by Excelerate (hereafter referred to as "the organization"). This policy outlines measures to protect the privacy of participants, the confidentiality of discussions, and compliance with applicable laws.

2. Virtual Meeting Platforms

Excelerate will use secure and reputable virtual meeting platforms for all its virtual meetings such as Zoom, Google Meets or Microsoft Teams. These platforms comply with industry-standard security protocols and offer the necessary safeguards for the protection of meeting data.

3. Meeting Access

A. Authentication:

- To ensure that only authorized individuals participate in virtual meetings, Excelerate will implement authentication measures such as password protection, unique meeting IDs, or user authentication.

B. Access Control:

- Meeting hosts will have the responsibility to manage participant access, including admitting participants from waiting rooms and removing unauthorized attendees.

C. Recording and Transcription

- Recording: Excelerate may, from time to time, record virtual meetings for various purposes, including but not limited to, training, documentation, and compliance. Prior notice will be given to all participants before recording starts. Recordings will only be enabled by the meeting host.
- Transcription:

- The organization may also transcribe recorded meetings for documentation and reference purposes. Any transcriptions will be stored securely and only accessible to authorized personnel.

Participant Conduct

A. Code of Conduct:

- Participants in virtual meetings are expected to adhere to a code of conduct that promotes respectful and professional behavior. Any disruptive or inappropriate behavior may result in removal from the meeting.

B. Privacy:

- Participants are expected to respect the privacy of others and refrain from sharing sensitive or confidential information without proper authorization.

Data Security and Privacy

A. Data Encryption:

- a. Excelerate will ensure that all data transmitted during virtual meetings is encrypted to protect it from unauthorized access or interception.

B. Data Retention:

- a. Recorded meetings and related data will be retained according to the organization's data retention policy and in compliance with relevant data protection regulations.

Meeting Setup

Excelerate will implement the following measures when setting up virtual meetings:

- **Waiting Room:** The Waiting Room feature will be enabled by default to allow the host to admit participants individually, reducing the chance of "meeting crashers."
- **Meeting Passcode:** A random numeric passcode will be generated for each meeting, which participants must enter to join. The passcode will be distributed only to the intended audience.
- **Screen Sharing:** Screen sharing will be set to "Host Only" by default to prevent unauthorized sharing but can be adjusted during the meeting.
- **Authenticated Users Only:** The option to allow only authenticated users with registered Zoom accounts to join meetings will be considered, with due consideration for potential accessibility issues.
- **Mute Participants on Entry:** Participants' microphones will be muted upon entry to reduce audio issues.
- **File Transfer:** File transfer functionality may be disabled to prevent the sending of unwanted files during meetings.

- **Personal Meeting ID:** Personal Meeting IDs will be kept private, and unique meetings or recurring meetings will be created for added security.

In-Meeting Security

- **Security Features:** Hosts will utilize the Security button in the toolbar to quickly enable/disable common security features, including Lock Meeting, Waiting Room, and participant options like Share Screen, Chat, and Rename Themselves.
- **Co-Hosts:** Co-hosts may be assigned to help manage live meetings, with specific roles and responsibilities defined.
- **Screen Sharing:** Screen sharing options will be managed by the host, allowing participants to share screens when appropriate during the session.
- **Mute All Participants:** The "Mute All" feature will be used as needed to address audio issues during the meeting.
- **Unmute Participants:** The option to allow participants to unmute themselves will be carefully managed based on the meeting's purpose and audience.
- **Remove Unwanted Participants:** Unwanted participants will be promptly removed from the meeting using Zoom's participant management tools.
- **Chat Control:** Chat functionality will be managed to prevent unwanted messages or distractions while allowing for necessary communication.
- **Video Control:** Hosts may use the "Stop Video" feature to disable a participant's webcam if necessary.
- **Lock Meeting:** The meeting may be locked once it has started to prevent new participants from joining.

Recording Access

For Zoom recording access, the following measures will be implemented:

- **Disable Sharing:** Only the recording owner will have access to the cloud recording.
- **Authenticated Users Only:** Access to shared cloud recordings may be limited to registered users
- **Viewers Can Download:** Access to download shared cloud recordings may be restricted.
- **Password Protect:** Shared cloud recordings may be password-protected for additional security.

How to Contact Us?

In order to resolve a complaint regarding the Site or to receive further information regarding the use of the Site, please contact us at:

Excelerate

support@4excelerate.org