# Your privacy

Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will collect, use and store your personal data. We may update this policy from time to time so please check it regularly. If there are significant updates, we will inform those people with whom we are in regular contact, such as members and email subscribers.

# 1. Who we are

Global Ayurveda Conferences, LLC (GAC) is a registered Limited Liability Company in Pennsylvania, USA and includes Global Ayurveda Academy (GAA), which is a registered entity of Global Ayurveda Conferences, LLC (GAC).

Both GAC and GAA are registered at: 567 Thomas Street, Suite 200, Coopersburg, PA 18036, USA.

# 2. What personal data we collect and the purposes for which we use it

2.1 What personal data do we hold?

Some examples of the type of information we may collect and hold about you are as follows:

- your full name and your title or an indication of the gender that you most closely associate with;
- birth date or alternatively a relevant age range;
- postal address;
- telephone number(s);
- email address;
- records of your correspondence with us;
- information you enter into our websites and digital products and details of how you use those
- websites and digital products;
- dietary, accessibility, and mobility information;
- Photographs and digital images of individuals
- We may also collect, hold and process other personal data where it is appropriate and relevant, for example:
- details of why you have decided to contact us and how you may have heard about us and the work we do;
- details of how you would like to be involved and what you intend to do with the information we provide;

- personal data about you that will enable us to be more precise in what we send you or how we approach you
- We will only process sensitive personal data also known as special categories of data (eg. in relation to your health), with your explicit consent, for reasons of substantial public interests or where necessary for the establishment, exercise or defence of legal claims.

# 2.2. How and why will we use this personal data?

2.2.1 We will use your personal data to:

- provide you with the information, product or service you have requested from us, including such things as: specific events that we run, merchandise from our online shop, responding to your inquiries and requests, attending educational activities and events, and to tell you about our work;
- provide you with other information which we feel may interest you. This may include newsletters, tips, updates, information in relation to fundraising campaigns, voluntary surveys or questionnaires for you to complete, details of any promotions and competitions we are running. We may also send you details of events we think you may be interested in attending;
- analyse and understand how people use our websites and digital products so we can improve and personalise the experience for users and reflect your preferences and previous interactions;
- keep a record of our relationship with you;
- improve how we communicate with you, how we fundraise, and how we operate more generally;
- keep in contact with you in the ways that you have requested or agreed to;
- personalise our services and communications to you (for example, to ensure that they consider your age, location and previous involvement with GAC and/or GAA);
- provide you with information about carefully selected third party events, products, campaigns and competitions, where we are permitted to do so;
- notify you about changes to our services;
- administer and process payments to GAC and/or GAA you make for products and services;
- verify your identity where required to use some of our services and benefits;
- comply with applicable laws and regulations and requests from statutory agencies including for such purposes as health and safety; the detection and prevention of crime and safeguarding;

• and carry out any obligations or provide you with any other services, functionality or content which you specifically request or agree to.

2.2.2 For the avoidance of doubt, GAC and GAA do not use personal data for automated decision-making, which produces legal effects or similarly significantly affects individuals. However, we may use profiling techniques in certain circumstances for the purpose of evaluating personal data to provide you with more targeted marketing and for the purpose of segmenting our database of clients and visitors so that we can communicate with you in the most relevant way possible.

#### 3. What lawful bases do we rely on to use your personal data?

The legal bases that we rely on for processing your personal data are:

3.1. You have provided us with your consent to use your personal data for a specific purpose. We will ask for your consent to use your personal data to send you marketing emails and SMS. You always have the right to withdraw your consent at any time.

3.2. Sometimes it is necessary to process your personal data so that we can enter contractual relationships with you. For example, if you purchase something from our online shop, attend one of our conferences, or become a student of ours, we will require your personal data to enable us to perform our agreement.

3.3. It is necessary for compliance with a legal obligation to which we are subject. This would include where we must retain certain records, for example, to manage safety, for the detection and prevention of crime, safeguarding obligations, for maintaining suppression lists

to ensure we comply with marketing laws.

3.4. It is within our legitimate interests:

Applicable law allows personal data to be collected and used if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (if the processing is fair, balanced and does

not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights. This may include where we undertake research on individuals including before we proactively contact them, as set out in Sections 4.2 and 4.3.

Where you have provided your details to us, we may contact you by post, email and phone for certain marketing activities as set out in section 5 below (but we will explain this to you at the point that we collect your details). You can opt out of this activity at any time by emailing us at gacllc2014@gmail.com.

We will also rely on our legitimate interests for the proper administration of GAC and GAA, and to manage our operations (for example, maintaining appropriate records and databases, for the detection and prevention of crime and safeguarding all those who access our premises and facilities).

When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws.

We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Please see section above for the limited legal basis for when we process sensitive personal data.

#### 4. How we collect personal data

We collect information about you:

4.1. When you give it to us directly

You may give us your personal data to receive information from us; visit our facilities; buy products or services from us including such things as taking part in any of our conferences or educational classes, workshops or seminars (or request information about these); when you respond to a survey or when you otherwise engage with us on our websites and digital products.

4.2. When a third party provides us with your personal data

Your personal data may be shared with us by third parties in certain circumstances. This may include (but is not limited to) individuals who may purchase products or services on your behalf, schools or other institutions who work with us or receive our services, by mutual contacts who recommend you to us or buy goods and services on your behalf or as a gift, and by our partners who may host and run events (or help to run and host events). Where appropriate, you should check any Privacy Policy of any third party when you provide your personal data to them to understand fully how they will process your personal data.

## 4.3. When it is available publicly

We may combine personal data you provide to us with personal data available from external publicly available sources such as published articles and newspapers. Depending on your privacy settings for social media services, we may also access personal data from those accounts or services. We use this personal data to gain a better understanding of you, and to improve our communications (see section 3 above).

#### 4.4. When you use our websites and digital products

We may collect personal data about you when you use our websites and digital products. Whenever you input personal data into our website (for example, if you register for a conference or class, workshop or seminar, purchase a product, or request information, support us through our website, or download any of our resources), we will collect the personal data that you give to us.

We use "cookies" to identify you when you visit our websites and digital products. Amongst other things this helps us to understand our website users and may enable us to improve the website experience for you and/or other users. Please refer to our Cookies Policy for details on how and why we use this data. We may collect other personal data from your use of the websites, such as your IP address and access times.

We may link our websites directly to other sites. This privacy policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit.

#### 5. Communications and marketing

5.1 We may contact you by email, post and telephone, where you have provided consent, to let you know about our events and activities (and we may also mention those of third parties, particularly

where they are collaborating with us or sponsoring our events) that might be of particular interest to you; retail offers and promotions, or about the conferences and educational offerings of GAC and GAA more generally. We provide the opportunity for you to opt-out from receiving our marketing communications every time we contact you.

You can opt-out from receiving our marketing communications, or update your contact preferences at any time by emailing: gacllc2014@gmail.com.

5.2 Social media targeting

If you are a social media user, we will use certain social media tools as part of our relationship with you. These tools include such things as Facebook and Instagram Custom/Lookalike Audiences, Google

Customer Match/Similar Audiences, Twitter Tailored/Lookalike Audiences and LinkedIn Matched Audiences. Through using these tools, we will provide some of your data to the social media platform / organization to allow them to identify your social media profile with them. The social media platform / organization will then show you relevant advertisements relating to GAC and GAA, which we think you will be interested in seeing on your newsfeed.

The social media platform / organization will also use your profile to identify those with similar characteristics to you who we think may also be interested in finding out more about GAC and GAA and the work we do. These identified individuals will then be shown advertisements about Ayuwave on their newsfeed. This activity is

governed by the social media platform's own privacy policy and terms and conditions, so please refer to these documents if you require any further information about this activity.

# 6. Data sharing

We do not sell your information under any circumstances. We may from time to time share your personal data with third parties for them to use for marketing purposes or for us to use jointly with a third party

where we are embarking upon a joint fundraising project. However, we will only ever do this where you have given us permission to do so.

We work with service providers and other third parties who help us to operate and to provide and improve our information, products and services, and we may share information with them for this purpose.

Whilst we may allow our staff, consultants and/or external service providers acting on our behalf to access and use your personal data for the activities we have described in this policy (e.g. to provide services or products to you, deliver mailings, to analyze data and to process payments), we only permit them to use it to deliver the relevant information, goods or services, and only if they apply an appropriate level of security protection.

We may need to disclose your personal data upon request to regulatory and government bodies as well as law enforcement agencies. We may also partner

with other organizations and in so doing, acquire or transfer personal data, but your personal data would continue to be used for the purposes set out above.

The personal data we collect from you may be transferred to, shared and/or otherwise processed by organizations or companies outside the European Economic Area ("EEA"). Where your personal data is transferred outside the EEA, we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your personal data (for example, by including EU Commission approved standard contractual clauses).

Unfortunately, the transmission of personal data via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to or via our websites and digital products; any transmission is at your own risk. If you have any questions about the international data transfer of your personal data, please contact us using the details below in section 10.

## 7. Your rights

Please note that you may only use/ benefit from some of the following rights in limited circumstances. For more information, please contact us using the details in section 10 below.

#### 7.1 Right to restrict processing

In certain circumstances, in accordance with GDPR laws and regulations, you have a right to require us to stop processing your personal data in a particular way.

#### 7.2 Right to erasure

You have the right to request that your personal data is erased from our records in certain circumstances.

#### 7.3 Right of access

You have a right to ask for a copy of the personal data we hold about you. If you want to access your personal data, please send a description of the personal data you want to see and proof of your identity by postal mail to Global Ayurveda Conferences, LLC, 567 Thomas Street, Suite 200, Coopersburg, PA 18036, USA.

#### 7.4 Right to rectification

We also want to make sure that your personal data is accurate and up to date. Please let us know if your details change. You may also ask us to correct or remove personal data which is inaccurate.

## 7.5 Right to object

You may also opt-out of receiving all or some of our marketing/ fundraising communications or request that we stop processing personal data about you for certain purposes at any time by contacting us using the details below.

## 7.6 Right to data portability

In certain circumstances you have a right to data portability which means we will provide you (or a third party you nominate) with your personal data in a structured, commonly used and machine-readable format.

## 8. Complaints

If you are unhappy with the way in which we have handled your personal data, please contact us using the details below in section 10.

Please let us know if you have any queries or concerns about the way that your personal data is being processed by us by contacting us at the address below.

# **11. Data retention**

We keep personal data for as long as there is a need to keep it in connection with the purposes for which it was collected. We may keep your personal data after a particular matter or exchange has concluded, but purely for record keeping purposes and to be able to respond to queries. In some cases, we are also obliged to retain your personal data to comply with legal or statutory obligations (for example, to keep records of contractual or financial matters).

While the specific time periods vary depending on the circumstances, in general we will not keep records that include personal data for more than 10 years after a particular matter or exchange has concluded. If you ask us to stop sending you marketing communications, we will retain certain details, such as your name and email address, but only to ensure that you are not contacted again.

# 9. Contact

For all enquiries with respect to this privacy policy, please contact us at Global Ayurveda Conferences, LLC, 567 Thomas Street, Suite 200, Coopersburg, PA 18036, USA.

## 10. Websites and digital products

In this policy "websites and digital products" refers to all GAC and GAA websites, including the primary GAC and GAA websites found at <u>www.globalayurvedaconferences.com</u> and all our digital products, such as email, applications and digital channels, including social media.

#### 11. Changes to this privacy policy

We keep our privacy policy under regular review. This privacy policy was last updated in May 2018.