

PRIVACY POLICY

INTRODUCTION

Skoll Foundation (“Skoll”, “us”, “we” or “our”) created this privacy policy (“Privacy Policy”) to advise you about our information practices, such as the types of information we collect and how we may use that information, and to inform you about your privacy rights and how the law protects you. We urge you to read this Privacy Policy carefully. Please also review our [Terms of Use](#) which govern your use of the Website (as defined below).

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

Individuals in the European Union (“EU”) should be sure to read the important information provided in Section XIII below, in addition to the other provisions in this Privacy Policy.

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I. IMPORTANT INFORMATION AND WHO WE ARE

A. APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to www.skoll.org and all other websites, features, or online services that are owned or controlled by Skoll and that post a link to this Privacy Policy (collectively, the “Website”), whether accessed via computer, mobile device, or otherwise. Note, however, this Privacy Policy does not apply to your use of unaffiliated websites that link to our Website. Once you enter another website (whether through an advertisement, service, or content link), be aware that we are not responsible for the privacy practices of such other websites. Furthermore, this Privacy Policy only covers information collected on the Website or via e-mail and does not cover any information collected by us through other means, such as direct mail, paper applications, in person communications, or other offline methods (unless specifically stated).

B. PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Skoll collects and uses your personal information through your use of the Website, including any information you may provide through the Website when you sign up to receive our newsletter(s), apply to attend one of our events, or request further services or information from us.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or using personal information about you so that you are fully aware of how and why we are using your information. This Privacy Policy supplements the other notices and is not intended to override them.

C. CHILDREN

Our Website is not intended for children and we do not knowingly collect information relating to children. If Skoll discovers that it has inadvertently collected personal information from anyone younger than the age of 13, it will delete that information. If you are under 13, please do not register on the Website, make any purchases through the Website or send any information about yourself to us, including your name, address, telephone number or e-mail address. If you believe that we might have any information from or about a child under 13, please contact us at privacy@skoll.org.

D. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated effective as of May 25, 2018, and historic versions can be obtained by contacting us.

We reserve the right, at any time and without notice, to add to, change, update or modify this Privacy Policy, simply by posting such change, update or modification on the Website. Any such change, update or modification will be effective immediately upon posting on the Website. If we make material changes to this privacy policy, we will notify you through a notice on our home page. However, unless you consent, Skoll will not use your personal information in a manner materially different than what was stated in our posted Privacy Policy at the time your personal information was collected.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. If you

contact us with changes, we will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable. Note, however, that information may persist internally for our administrative purposes and that residual data may remain on backup media or for other reasons.

E. THIRD PARTY CONTENT, LINKS TO OTHER WEBSITES, AND SKOLL CONTENT FOUND OUTSIDE THE WEBSITE

The Website may include links to third-party websites, plug-ins and applications and certain content on the Website may be hosted and served by third parties that Skoll does not control. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy of every website you visit.

In addition, Skoll content may be included on web pages and websites that are not associated with Skoll and over which we have no control. These third parties may collect data through the use of their own cookies, web beacons or other technology, independently collect information or solicit personal information, and may have the ability to track your use of their websites and services. Skoll is not responsible for the privacy practices or the content of any third party.

II. THE INFORMATION WE MAY COLLECT ABOUT YOU

Personal information or personal data means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data).

We and our third-party service providers may collect, use, store and transfer different kinds of personal information about you that we have grouped together as follows:

- **Identity Information** includes name, username or similar identifier, title, date of birth, tax reporting or similar number or code, photograph, gender and nationality.
- **Demographic Information** includes zip or postal code, age and/or income.
- **Contact Information** includes billing address, delivery address, email address and telephone number(s).
- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments to and from you.
- **Technical Information** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and geographical location, browser plug-in types and versions, operating system and platform and other technology or other unique identifier (a set of numbers or characters that is assigned to your computer, mobile phone, or other device when you are on the Internet) (“Device Identifier”) for any computer, mobile phone, tablet or other device (any of which are referred to herein as a “Device”) used to access the Website.
- **Profile Information** includes your username and password, applications, purchases or orders submitted by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products and services, including all the areas within our Website that you visit or use, and the time of day, you visited the Website, among other information.
- **Marketing and Communications Information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Location Information** includes information about your location using a variety of technologies, such as GPS, IP address, and connected or nearby Wi-Fi networks.
- **User Content Information** includes text (including questions, comments, and suggestions), pictures, audio, videos, or other content (collectively, "User Content") you share by participating and posting content publicly in chat rooms, forums, interactive features, or other communication functionality ("Community Features").

We also collect, use and share **Aggregated Information** such as statistical or demographic information for any purpose. Aggregated Information may be derived from your personal information but is not considered personal information in law as this information does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information that will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories** of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

III. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect information from and about you including through:

- **Direct interactions.** You may give us your Identity, Demographic, Contact, Financial, Profile, or Marketing and Communications Information by filling in forms or by corresponding with us by mail, phone, email, or otherwise. This includes personal information you provide when you:
 - register for an account on the Website;
 - sign up to receive e-mail newsletters, services or publications from us;
 - participate in surveys, panels, or research;
 - purchase, register for or participate in our programs, activities, initiatives, events, social media accounts, communities, chat rooms and/or other interactive services;
 - request services, information or assistance;
 - submit an application for funding or other support from us;
 - inquire about or apply for employment; or
 - give us feedback.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical, Usage, and Location Information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, web beacons, embedded scripts and other similar technologies. We may also receive Technical Information about you if you visit other websites employing our cookies. Note that our mobile applications may use similar technologies.
 - **Cookies** - Cookies are small data files that a website sends to your Device while you are viewing the website that are stored on the Device. Cookies can be used for many purposes, including to monitor use of websites, to customize content specific to your interests, to

ensure that you do not see the same advertisement repeatedly, to speed up your searches and purchases and to recognize you when you return to our Website and/or store your user name and password so you do not have to re-enter it each time you visit the Website. You may refuse to accept cookies by activating the appropriate setting on your browser. However, if you choose to disable cookies on your Device, some features of the Website or our content may not function properly.

- **Web Beacons** - Web Beacons are small graphic images or other web programming code (also known as “pixel tags,” "1x1 GIFs" or "clear GIFs") that may be included on the Website and in our e-mail messages. In contrast to Cookies, which are stored on a user’s Device, Web Beacons are embedded invisibly in web pages. Web Beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or e-mail can act as a Web Beacon. Web Beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Website, to monitor how users navigate the Website, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.
- **Embedded Scripts** - Embedded scripts are programming code designed to collect information about your interactions with the Website, such as the links you click. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Website.
- **Flash LSOs** - We may use Flash Local Shared Objects (“Flash LSOs” or “flash cookies”) and other technologies to, among other things, collect and store information about your use of the Website. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also control Flash LSOs by going to the [Global Storage Settings Panel](#) and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to "information" on the Macromedia Website), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with the Website or our online content.
- **Community forums.** The Website may provide you the opportunity to participate and post User Content publicly through chat rooms, forums, interactive features, or other communication functionality (“Community Features”). We may provide functionality for you to submit or post User Content through Community Features, by linking the Website to a third party service, or otherwise. Please note that certain information, such as your username and profile picture, may be publicly displayed on the Website along with your User Content. User Content consisting of uploaded files may contain metadata, which may contain personal information or other information about or relating to you. You may wish to remove metadata from your files before transmitting such files to Skoll. **Note that anything you post through Community Features is public -- others will have access to your User Content and may use it or share it with third parties. If you choose to voluntarily disclose personal information, that information will be considered public information and the protections of this Privacy Policy will not apply. If you submit User Content, it may be published online or offline at any time. In addition, we may use your User Content and any excerpt from your User Content in connection with our advertising, marketing, publicity and promotional activities.**

- **Third parties or publicly available sources.** We may receive personal information about you from various third parties. For example, if you are on another website and you opt-in to receive information from us, the other website will forward your contact and other information to us so that we may contact you as requested. If your company has provided you with access to the Website, we may receive information about you from your company. We also may supplement the information we collect with outside records from third parties in order to provide you with information, services or goods you have requested, to enhance our ability to serve you, to verify, edit or enhance your customer record, and to tailor our content to you. We may combine the information we receive from those other sources with information we collect through the Website. In those cases, we will apply this Privacy Policy to the combined information. Examples of third party sources include:
 - Technical Information from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information.
 - Contact, Financial and Transaction Information from providers of technical, payment and delivery services.
 - Identity and Contact Information from publicly available sources.
 - Identity, Contact and Financial Information from companies that facilitate verification of your account information.
 - Identity and Contact Information from government funders or grantors.

IV. THIRD PARTY INTERACTIONS

Certain functionality on the Website may permit interactions that you initiate between the Website and a third party website or service (“**Third Party Interactions**”). Examples of Third Party Interactions may include technology that enables you to “like” or “share” content from the Website on or to other websites or services; to transmit content to the Website from your account on a third party website or service; to otherwise connect the Website to a third party website or service, such as through an application programming interface (API) made available by Skoll or a third party; or for users to register for an account and login through social networking sites such as Facebook and Google (each an “**SNS**”). By registering or logging in through a SNS, you are allowing the Website to access your information and you are agreeing to the SNS’s Terms of Use and Privacy Policy in your use of such services. We may receive information from the SNS to make it easier for you to create an account with us. Any information that we collect from your SNS account may depend on the privacy settings you have with that SNS, so please consult the SNS’s privacy and data practices.

If you choose to use Third Party Interactions, information you post or provide access to may be publicly displayed on the Website or by the provider of the Social Feature that you use. Similarly, if you post information on a third party platform that references the Website (e.g., by mentioning the Website or using a hashtag associated with the Website in a tweet or status update), your post may be published on our Website in accordance with the terms of the third party website or service. Also, both Skoll and the third party may have access to certain information about you and your use of the Website and the third party website or service. In addition, we may receive information about you in connection with other users’ use of Third Party Interactions (e.g., we may learn that you are a “friend” or “connection” of the third party or receive other information about you that the other user enables us to receive).

The information we collect in connection with Third Party Interactions is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party website or service.

V. THIRD PARTY ANALYTICS PROVIDERS & AD SERVERS; ONLINE TRACKING

Skoll works with certain third parties (including network advertisers, ad agencies, and analytics companies) to provide us with information regarding traffic on the Website, to serve advertisements, including our advertisements elsewhere online, and to provide us with information regarding the use of the Website and the effectiveness of our advertisements. These third parties may use Device Identifier and Usage Data to compile reports on user activity. For example, if you clicked on one of our advertisements that led you to one of the Website, our service provider(s) may be able to tell us which advertisement you clicked on and where you were viewing the advertisement. These third parties may set and access their own tracking technologies (including cookies, embedded scripts, and pixel tags) and may otherwise collect or have access to your Device Identifier, Usage Data and related information about you. Cookies and pixel tags, including those set by third party network advertisers, may be used to, among other things, target advertisements, prevent you from seeing the same advertisements too many times, conduct research regarding the usefulness of certain advertisements to you, and assist in providing analytics.

These third parties may also transfer Device Identifier and Usage Data to other third parties where required to do so by law, or where such third parties process analytics information on their behalf. Each of these third party's ability to use and share Device Identifier and Usage Data is restricted by their respective Terms of Use and Privacy Policy. By using our Website, you consent to the processing of data about you by these third parties in the manner and for the purposes set out above. For a full list of third party analytics services, please contact us at privacy@skoll.org.

We may share Device Identifier and Usage Data about visitors with third party advertising companies, analytics providers and other vendors for similar purposes. While we may use a variety of service providers to perform advertising and analytics services, some of these companies may be members of the Network Advertising Initiative ("NAI") or the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising.

For additional information regarding targeted advertising and the "opt-out" procedures of NAI members and DAA Self-Regulatory Program participating companies, you may visit:

- NAI Opt-Out Tool (for website users): http://www.networkadvertising.org/managing/opt_out.asp
- DAA Consumer Choice (for website users): <http://www.aboutads.info/choices/>
- DAA AppChoices (for mobile app users): <http://youradchoices.com/appchoices>

Please note that opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while visiting the Website and elsewhere online. Some third parties may collect personal information about your online activities over time and across different websites.

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. However, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, the Website currently does not respond to or alter practices upon receipt of a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit <http://www.allaboutdnt.com>.

VI. HOW WE USE YOUR PERSONAL INFORMATION

We may use the information we collect about you, including personal information, in the following ways:

- To provide you with information or services that you have requested or agreed to receive;
- To identify you as a user in our system;
- For editorial purposes;
- To process a transaction you initiate;
- To respond to your inquiries regarding employment opportunities or other requests;
- To communicate with you about your transactions with us, use of the Website and, in our discretion, changes to our Website policies or functionality;
- To bill you for Skoll event registration fees and related charges;
- To send you newsletters, mailings, and information about Skoll programs, initiatives, activities, and events by e-mail or another medium;
- To process your grant application or employment application;
- To process your event or program registration;
- To optimize or improve our Website, programs, services, and operations;
- To process your registration and account creation with the Website, including verifying that your contact information and account activities are active and valid;
- For compliance, fraud prevention, and safety, including enforcing our terms of service and this Privacy Policy, protecting our rights privacy, safety, or property and/or that of you or others, and protecting against, investigating or deterring fraudulent, harmful, unauthorized, unethical or illegal activity; and
- To perform other functions as described at the time of collection, with your consent, or as further described in this Privacy Policy.

In addition to the above, we may use anonymous data to analyze request and usage patterns so that we may enhance the content of our services and improve navigation on the Website. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

A. PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

B. COOKIES

Cookies are small text files that are placed on your computer by websites that you visit. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do

not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We may use cookies to display information more effectively and to personalize your experience while using the Website. We may also gather statistical information about the usage of the Website in order to improve the design and functionality, understand how the Website is used and to assist us with resolving questions regarding the Website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Examples of how to disable cookies on various browsers can be found below. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=en>;
- **Edge:** <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>;
- **Firefox:** <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>;
- **Internet Explorer:** <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;
- **Opera:** <http://www.opera.com/help/tutorials/security/cookies/>; and
- **Safari:** <https://support.apple.com/kb/PH21411>.

Again, please note that blocking all cookies will have a negative impact upon the usability of many websites and you may experience some inconvenience in your use of the Website. For example, we may not be able to recognize your computer and you may need to log in every time you visit the Website.

VII. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may share non-personally identifiable information, such as aggregated user statistics, in our discretion and without restriction.

We may disclose the information we have collected about you, including personal information, as disclosed at the time you provide your information, with your consent, as described in this Privacy Policy, or in the following circumstances:

A. INTERNAL THIRD PARTIES

Skoll may disclose information including personal information to the Skoll Fund and the Silicon Valley Community Foundation for a variety of purposes, including for business and operational purposes.

B. EXTERNAL THIRD PARTIES

Third Party Service Providers

Skoll may disclose personal information with third party service providers in connection with the performance of services to, or on behalf of, Skoll and the Website, including Website hosting, data analysis, information technology and related infrastructure provision, auditing and other similar services. For example, online registration for some of our events is hosted by Cvent. You acknowledge and agree that your use of the Website may include having your personal information transferred to and stored by Cvent

pursuant to their privacy policy, which is available at <https://www.cvent.com/en/privacy-policy>. These service providers may store or use your information outside of the EU or the United States.

Third Party Payment Processing

Online payments made through our Website are handled by one or more payment services providers,. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

Administrative & Legal Reasons

We may transfer and disclose information, including personal information, to third parties:

- to comply with a valid legal inquiry or process such as a search warrant, subpoena, statute or court order, or if in our opinion such disclosure is required by law;
- to obtain or maintain insurance coverage, manage risks, obtain professional advice, or establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure;
- to protect the safety, interests, rights, property or security of Skoll, you, or any third party; this may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- to respond to a breach or attempted breach of the security of our Website;
- to defend or assert our legal rights pursuant to any of the Website's Terms of Use, any policies applicable to the Website, or any other agreement you may have with Skoll; or
- at the request of governmental authorities conducting an investigation.

We may also use Technical Information to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers, or law enforcement agencies in our discretion.

Community Features

As set forth in Section III, our Website and services may enable you to post or submit User Content through Community Features. If you choose to use these features, any information you post or disclose through these services may be available to any or all other users of the Website. Please note that any personal information you include on a public area of the Website will be publicly viewable. Once displayed publicly, that information can be collected and used by others. We cannot control who reads your postings or what other users may do with the information that you voluntarily post, so it is very important that you do not put data such as private contact information that you do not want to make available to the public in your posts. Once you have posted information publicly, while you will still be able to edit and delete it on the Website, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines). We urge you to be thoughtful when deciding to disclose your personal information on the Website.

VIII. YOUR CHOICES

A. ACCESSING, UPDATING, CORRECTING OR DELETING INFORMATION

You may review, update, correct or delete your personal information by logging into the Website and visiting your account profile page and making changes. You may also send us an e-mail at privacy@skoll.org to request access to, correct or delete any personal information that you have provided to us.

You may request deletion of your personal information by contacting us and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain information for fraud prevention or similar purposes. Also, note that we may need to delete your user account in order to delete your personal information.

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. If you contact us with changes, we will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable. Note, however, that information may persist internally for our administrative purposes and that residual data may remain on backup media or for other reasons.

B. OPTING OUT

We will only send you direct emails or other contacts if you opt-in to receive such emails. In the future, if you do not wish to have your e-mail address or other contact information used for this purpose, you may indicate a preference to stop receiving further communications from us and can “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly at privacy@skoll.org. Where you opt out of receiving these communications, this will not apply to personal information provided to us as a result of the purchase of any service (such as event registration) or other transaction and we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

C. CHOOSING NOT TO SHARE PERSONAL INFORMATION

You may choose not to provide us with any personal information. In such an event, you may still be able to access and use some of the Website; however you may not be able to access and use those portions of the Website that require your personal information. You may opt out of receiving e-mails by following the opt-out instructions above or provided to you in those e-mails. Please note that we reserve the right to send you certain communications relating to your account or use of any of the Website (for example, administrative and service announcements) and these transactional account messages may be unaffected if you opt-out from email communications.

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service (such as event registration) you have with us but we will notify you if this is the case at the time.

D. DE-LINKING THIRD PARTY INTERACTIONS AND SNS

As set forth in Section IV, our Website may enable you to interact with or post content to certain third parties and SNSs. If you would like to discontinue these interactions and connections, please refer to the privacy settings of the third party or SNS to determine how you may adjust our permissions and manage the interactivity between the Website and your social media account.

IX. DATA SECURITY

Skoll uses commercially reasonable security measures to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. However, no data transmission or storage system can be guaranteed to be 100 percent secure. Therefore we cannot ensure, warrant, or guarantee the security of any information we collect. You use our Website and provide us with your information at your own risk.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

X. USERS OUTSIDE OF THE UNITED STATES AND INTERNATIONAL TRANSFERS

The Website is hosted and operated in the United States and Skoll and its third party service providers and partners operate in the United States and other jurisdictions. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to and processed in the United States and other countries. By using the Website, or providing us with any information, you consent to this transfer, processing and storage of your information in countries where the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen.

XI. CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

Pursuant to California Civil Code Section 1798.83, residents of the State of California have the right to request from certain businesses conducting business in California certain information regarding disclosures within the immediately preceding calendar year of that California resident's personal information to third parties (and in some cases, affiliates) for direct marketing purposes.

If you are a California resident and you have questions about our practices with respect to sharing information with third parties and affiliates for their direct marketing purposes, please send your request to the following email address: privacy@skoll.org or write to us at the mailing address contained elsewhere on the Website.

XII. QUESTIONS

If you have any questions or concerns about this Privacy Policy or our practices, please contact us by sending us an email at privacy@skoll.org, via the Feedback link at <http://skoll.org/about/contact-us/>, or by writing to us at the mailing address posted elsewhere on the Website.

XIII. ADDITIONAL INFORMATION FOR RESIDENTS OF THE EUROPEAN UNION

A. PERSONAL INFORMATION

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

B. LEGAL BASES FOR PROCESSING PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform obligations relating to a contract to which you are a party or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Our legitimate interests include those related to conducting and managing our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending communications to you via email. You have the right to withdraw consent at any time by contacting us using the contact information provided above.

We have set out above, and again in the table below, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been stated above or in the table below..

Purpose/Activity	Type of Information	Lawful basis for processing including basis of legitimate interest
To register you as a new member or user	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
To process and deliver products and services including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(d) Transaction (e) Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to participate in sweepstakes, contests and promotional activities or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and the Sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Location	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Communications (f) Technical (g) Location	Necessary for our legitimate interests
To use data analytics to improve our website services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users for our services, to keep our website updated and relevant)
To make suggestions and recommendations to you about information that may be of interest to you	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to develop our content)

	(d) Usage (e) Profile	
To allow participation in Community Features	(a) Identity (b) Profile (b) User Content	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how users use our services)

C. CONTROLLER

Skoll Foundation is the controller and responsible for your personal information (collectively referred to as “Skoll”, “we”, “us” or “our” in this Privacy Policy).

Contact Details

Our full details are:

Skoll Foundation

Email Address: privacy@skoll.org

Postal Address: 250 University Avenue Suite 200, Palo Alto CA 94301 USA

D. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data, as described elsewhere in this policy.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

E. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

F. EU RESIDENT PERSONAL DATA RIGHTS

Under certain circumstances, EU Residents may have rights under data protection laws in relation to your personal data as outlined below:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it affects your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain information or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact privacy@skoll.org.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may refuse to comply with your request if it is clearly unfounded, repetitive or excessive.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made multiple requests. In this case, we will notify you and keep you updated.

Complaints to Supervisory Authority

EU Residents may have the right to make a complaint at any time to the supervisory authority for data protection issues. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority so please first contact us directly to allow us to do so.