

## HEC Grow – Data collection & treatment

### 1. THE INFORMATION WE COLLECT

I understand that by joining this site, I am opting-in to share certain personal profile data to other community members which may be considered to be part of my educational record under the Family Educational Rights and Privacy Act (FERPA) and with the HEC Alumni association's appointed data processor. I have reviewed my profile and associated data and agree that this data will be shared.

Some or all program administrators will be able to view all information that I add to my profile and all communications that I send through the platform.

User-provided Information. When you use the Service, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number. Personal Data also includes other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual. You may provide us with Personal Data in various ways on the Service. For example, when you register for an Account, use the Service, post Client Data, interact with other users of the Service through communication or messaging capabilities, or send us customer service -related requests. Integrated Services. You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

### 2. HOW WE USE THE INFORMATION WE COLLECT

We use the information that we collect in a variety of ways in providing the Service and operating our business, including the following:

#### 2.1 Operations

We use the information – other than Client Data - to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. We process Client Data solely in accordance with the directions provided by the applicable Client or User.

#### 2.2 Improvements

We use the information to understand and analyze the usage trends and preferences of our Visitors and Users, to improve the Service, and to develop new products, services, feature, and functionality. Should this purpose require HEC Alumni to process Client Data, then the data will only be used in anonymized or aggregated form.

## 2.3 Communications

We may use a Visitor's or User's email address or other information – other than Client Data – to contact that Visitor or User (i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or defamation issues related to the Client Data or Personal Data posted on the Service or (ii) with updates on promotions and events, relating to products and services offered by us and by third parties we work with. You have the ability to opt-out of receiving any promotional communications as described below under "Your Choices."

## 2.4 Cookies and Tracking Technologies

We use automatically collected information and other information collected on the Service through cookies and similar technologies to: (i) personalize our Service, such as remembering a User's or Visitor's information so that the User or Visitor will not have to re-enter it during a visit or on subsequent visits; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of Service and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service. You can obtain more information about cookies by visiting <http://www.allaboutcookies.org>.

### 2.5 Analytics

We use People Grove processors to measure and evaluate access to and traffic on the Public Area of the Site, and create user navigation reports for our Site administrators. The processors operates independently from us and has its own privacy policy, which we strongly suggest you review. People grove may use the information collected through People Grove evaluate Users' and Visitors' activity on our Site. For more information, see People Grove Privacy and Data Sharing : <https://support.peoplegrove.com/hc/en-us/articles/360000314912-Privacy-Policy-and-GDPR-Compliance>

We take measures to protect the technical information collected by our use of Google Analytics. The data collected will only be used on a need to know basis to resolve technical issues, administer the Site and identify visitor preferences; but in this case, the data will be in non-identifiable form. We do not use any of this information to identify Visitors or Users.

## 3. TO WHOM WE DISCLOSE INFORMATION

Except as described in this Policy, we will not intentionally disclose the Personal Data or that we collect or store on the Service to third parties without the consent of the applicable Visitor, User or Client. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

### 3.1 Unrestricted Information

Any information that you voluntarily choose to include in a Public Area of the Service, such as a public profile page, will be available to any Visitor or User who has access to that content.

### 3.2 Service Providers

We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

### 3.3 Non Personally Identifiable Information

We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our Clients', Users' and Visitors' interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Service.

### 3.4 Law Enforcement, Legal Process and Compliance

We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

### 3.5 Change of Ownership

Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Client Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the Service, and only if the recipient of the Client Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

## 4. YOUR CHOICES

### 4.1 Access, Correction, Deletion

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. If you wish to access or amend any other Personal Data we hold about you, or to request that we delete or transfer any information about you that we have obtained from an Integrated Service, you may contact us as set forth in the "How to Contact Us" section. At your request, we will have any reference to you deleted or blocked in our database.

You may update, correct, or delete your Account information and preferences at any time by accessing your Account settings page on the Service. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

- At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact HEC Alumni's career service. You also have a right to lodge a complaint with data protection authorities.

### 4.3 Opting out from Communications

- If you receive emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the "How to Contact Us" section.
- Users are able to view and modify settings relating to the nature and frequency of promotional communications that they receive from us by accessing the dedicated section on the platform.
- An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to HEC Alumni's career department. If the Client requests HEC Alumni to remove the data, we will respond to its request within thirty (30) days. We will delete, amend or block access to any Personal Data that we are storing only if we receive a written request to do so from the Client who is responsible for such Personal Data, unless we have a legal right to retain such Personal Data. We reserve the right to retain a copy of such data for archiving purposes, or to defend our rights in litigation. Any such request regarding Client Data should be addressed as indicated by e-mail, and include sufficient information for HEC Alumni to identify the Client or its customer or third party and the information to delete or amend.