

# KNOWLEDGEWORKS FOUNDATION'S GDPR PRIVACY NOTICE

*(Effective June 30, 2018)*

## ***Introduction***

This GDPR Privacy Notice is a supplement to our privacy policy and concerns certain personal data we have collected about residents of the countries in the European Union, consisting of the European Economic Area, Switzerland, and to the extent that the United Kingdom is no longer a member of the European Economic Area, the United Kingdom. It explains why we have that information, how we use and handle it, and your rights to that information, all as required by the European Union's General Data Protection Regulation ("GDPR").

### A. What personal data do we hold?

#### *1. You Provide to Us*

As a general policy, we do not automatically collect your personally identifiable information when you use our Services. In certain circumstances, we may request, allow or otherwise provide you an opportunity to submit your personally identifiable information in connection with a feature, program, promotion or some other aspect of our Services. For instance, you may: (a) provide your name, mail/shipping address, email address, credit card number and phone number when registering with our App or Website, or in connection with your participation in a promotion; (b) provide certain demographic information about you (e.g., age, gender, purchase preference, usage frequency, etc.) when using our App, or participating in a survey or poll; or (c) post a general comment and/or recommendation through our Services. Certain information may not be personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). Whether you provide this information is your choice; however, in many instances this type of information is required to participate in the particular activity, realize a benefit we may offer, or gain access to certain content or features available through our Services.

#### *2. From Others*

We may receive information about you from our vendors or affiliates, such as your personal contact information such as name, email address, phone number, and country of residence, or in the context of providing servicing and support to our customers.

### B. Where did we get your personal data?

We collect your personal data when you ask us to contact you, or when you place an order for our products and services. Your failure to provide this information means we cannot fulfill your request. We may also collect your contact information when you provide it by using our Website or one of our Apps, as well as your IP address and other information about your activity on our Website, such as what pages you visit. We may also receive personal data when we are working on the resolution to our customers' problems.

C. What is our purpose for holding your personal data?

Our lawful basis for holding your information depends on the circumstances under which we acquired it:

Type of Information	Lawful Basis for Processing
Customer and prospective customer contact information collected in connection with an order or an inquiry	For fulfillment of a contract
Customer and prospective customer contact information collected for use in marketing additional products and services	Consent or Legitimate Interest
Personal data of our customers' customers	For fulfillment of a contract

D. What we do with your personal data

We use your details so that we can communicate with you by email or phone and inform you of our services, the status of your order, or questions about payment of your invoice. We may also collect your IP address and details concerning your activity while on our Website in order to secure our systems and understand your interests and preferences.

We may conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with our Websites, and information obtained from third parties) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We will process your personal data for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications.

The personal data we hold is stored and processed securely in line with the information security measures and guidance standard in our industry. We have implemented appropriate technical and organizational measures designed to prevent the unauthorized disclosure of your personal data, taking into account the level of risk associated with the processing of your personal data.

If we receive your personal data in the context of providing problem-solving services to our customers, we will securely accept that data, segregate it from other customer data, and limit access to the data. We will delete the data once the issue is resolved.

E. Cross Border personal data transfers

Your personal data may be transferred to and stored at our servers located in the United States. The United States has personal data privacy laws that are different from your country.

F. What we don't do with your personal data

We do not pass your information to anyone else apart from our business services partners as necessary to provide you with the products and services you have requested or pursuant to our legitimate interest in undertaking marketing activities that offer you products or services that may be of interest to you.

G. How long do we keep your personal data?

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Notice, unless a longer retention period is required or permitted by law, or we have obtained your consent.

H. What are my personal data rights?

You have the following rights concerning your personal data that we hold and process that you can exercise at any time:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct personal data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the personal data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you can restrict the processing of the personal data we hold about you.
- Right of portability – you have the right to have the personal data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review: in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the process below.

All of the above requests will be forwarded on to other parties holding and processing your personal data where appropriate.

I. Who do I contact if I have an issue with my personal data that you hold?

Please contact our Privacy Officer at [dimaggiom@knowledgeworks.org](mailto:dimaggiom@knowledgeworks.org).

J. How do I make a complaint about how my personal data is being held or processed?

If you wish to raise a complaint on how we handle your personal data, you can contact our Privacy Officer as follows:

**By Email:** [dimaggiom@knowledgeworks.org](mailto:dimaggiom@knowledgeworks.org)

**By Mail:** KnowledgeWorks Foundation  
Attn: Michael DiMaggio  
1 West Fourth Street, Ste 200  
Cincinnati, Ohio 45202

If you are not satisfied with our response you can complain to the data protection authority in the country in which you reside.

This GDPR Privacy Notice was last updated on June 30, 2018.

**Related Information**

- [Terms of Use](#)