

## **WINGS – Privacy Policy - Users**

This Privacy Policy is edited by WINGS, a legal entity having its registered office at Rua da Consolação, 368, 12º andar, conjunto 121, São Paulo/SP, CEP 01302-000, and registered with the National Register of Legal entity (CNPJ) under the number 15.530.055/0001-80 (hereafter, the “**Organisation**”).

The Organisation offers a platform for educated connections (hereafter, the “**Platform**”) to its users which have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address <https://wings.us.hivebrite.com/>

The Organisation uses a solution called “Hivebrite”, which enables the import and export of user campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, as data controller, the Organisation is particularly aware and sensitive with regard to the respect of its Users privacy and personal data protection. The Organisation commits to ensuring the compliance of the processing it carries out as a data controller in accordance with the applicable provisions of the EU Regulation EU 2016/679 regarding data protection dated April 27, 2016.

In order to do so, the Organisation has put in place an appropriate privacy policy which guarantees an optimal level of protection of its Users’ data.

This privacy policy is intended for the Users of the Platform of the Organisation.

### **ARTICLE 1. COLLECTED PERSONAL DATA**

#### **1.1 When subscribing on the Platform**

When subscribing on the Platform, the User is informed that its following personal data is collected:

- email;
- location;
- birthdate;
- information regarding current job position and affiliation.

The User commits to only provide accurate, exhaustive, and regularly updated data regarding its identity, its content and any information in general. Under no circumstances shall the Organisation be liable for any data that is illegal contrary to public order provisions.

In the event the User does not consent to the collection of the above-mentioned data, it shall be informed that it cannot have access to the Platform.

## **1.2 During the use of the Platform**

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Organisation:

- Information about the organization headquarters location;
- Organization type;
- Geographic scope of the organization;
- Main philanthropy focus of the organization;
- Other staff members' contact information to join the platform (First and last name, email, and area of work).

The User commits not to publish any content which contains, including but not limited to, any remarks/images/pictures, contrary to applicable legislation and regulations, to public order and good morals, or affecting the rights of third parties, including but not limited to:

- Identity fraud of a third person;
- Remarks/publish pictures or images that are violent, defamatory, offensive, malicious, obscene, inciting to discrimination or hatred, racist, xenophobic, anti-Semitic, condoning or approving war crimes, inciting to committing a crime, offence, act of terrorism, or contrary to the security of minors;
- Counterfeiting the intellectual property rights of a third person;
- Commercial canvassing or elements that could be qualified as unfair competition.

In any event, Hivebrite shall not be liable for the content, accuracy, or up-to-date state of the information freely published by the User.

The User consents that, following the publication of the content, its information will become public on the Platform and that as such, same information will be published, modified, translated, reproduced in any form and accessible, saved and reproduced by other Users and the Organisation.

In most cases, Users post contents without previous moderation from the Organisation. The Organisation does not alter the content or information of the User, except under exceptional circumstances. The Organisation reserves its right to freely delete or amend the content or information of the User, without prejudice to the Users.

In the case of delivery of content on the Platform which contravenes with the present privacy policy, applicable law or the rights of third parties, any person can inform the Organisation of the existence of such Content at the following address: [info@wingsweb.org](mailto:info@wingsweb.org).

The User is informed that the Organisation does not collect any particularly sensitive data within the meaning of applicable legislation and regulations.

## **1.3 Cookie data**

The Organisation informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform.

A cookie is a message that, subject to the User settings, is sent to its terminal when the User navigates on a website. The aim is to collect data regarding the internet navigation of the User to send tailor-made services to its terminal (computer, mobile phone or tablet).

The cookies that are sent to the User's terminal are detailed under Article 2 of the present privacy policy.

The purpose of the process of the data collected through the cookies and the settings of such processing is detailed under Article 9 of the present privacy policy.

## **ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING**

The Organisation and its subcontractors collect, process and host personal data that are freely transferred by the User when accessing the services proposed by the Platform.

<b>Collected Data</b>	<b>Purpose of the processing</b>
<p>When subscribing on the Platform:</p> <ul style="list-style-type: none"><li>- First and last name;</li><li>- email;</li><li>- location;</li><li>- Information about the organization headquarters location;</li><li>- Organization type;</li><li>- Geographic scope of the organization;</li><li>- Main philanthropy focus of the organization;</li><li>- Other staff members' contact information to join the platform (First and last name, email, and area of work).</li><li>- information regarding current job position and affiliation;</li></ul>	<ul style="list-style-type: none"><li>• Access to the Platform;</li><li>• Creation of a user account;</li><li>• Access for the User to all functionalities of the Platform, meaning: live feed, members profile, events, news, donations, groups, media centre, portfolios, spotlights, and job board;</li><li>• Management of requests to access, amend, delete, limit and oppose.</li></ul>

<p>When using the Platform:</p> <ul style="list-style-type: none"> <li>- Birthdate</li> <li>- Bio</li> <li>- Questions about the organisation's engagement with WINGS</li> </ul>	<ul style="list-style-type: none"> <li>• The use and feeding of the Platform;</li> <li>• Management of membership payments and donations through the Platform;</li> <li>• Sending invitations for events organized by the Organisation or other Users, if the User has accepted to receive such invitations;</li> <li>• Sending job offers Organisation or its partners if the User has accepted to receive such offers.</li> </ul>
<p>Cookies, trackers:</p> <ul style="list-style-type: none"> <li>• Add to calendar</li> <li>• Keep active session</li> <li>• The user/admin ID</li> <li>• User first connexion</li> <li>• Stripe #1, #2</li> <li>• Paypal, 13 cookies</li> <li>• Identify the user session</li> <li>• Admin ID</li> <li>• User search</li> <li>• Google analytics #1, #2, #3.</li> <li>• LinkedIn</li> </ul>	<ul style="list-style-type: none"> <li>• Improve the quality of the services proposed by the Platform;</li> <li>• Improve the usage functionalities of the Platform;</li> <li>• Create statistics regarding the effective use of the Platform;</li> <li>• Enable the User not to have to reconnect to the Platform for every new navigation on the Platform;</li> <li>• Invite the User to events organized by the Platform;</li> <li>• Create statistics regarding the different levels of activity on the Platform. The cookies cannot allow identifying the User;</li> <li>• Enable the synchronization of the User's LinkedIn profile;</li> <li>• Manage banking transactions.</li> </ul>

The Organisation only collects and processes the User's personal data for the purpose for the optimal implementation and use of the Platform that is put at its disposal.

### **ARTICLE 3. USER'S CONSENT TO THE COLLECTION OF DATA**

The Organisation informs the User that no personal data within the meaning of applicable legislation and regulations shall be collected without the prior explicit consent of the User.

The User expresses its consent upon its subscription on the Platform, and after having been able to consult the present privacy policy.

The Organisation and its subcontractors commit to a lawful and fair collection of the User's data, in full transparency and in compliance with the rights conferred to the User pursuant to applicable legislation and regulations.

#### **ARTICLE 4. LENGTH OF DATA RETENTION**

The Organisation informs the User that the data is retained only during the length of the User's subscription on the Platform.

Following the termination of the said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of one year.

The Organisation informs the User that it uses a payment service provider called Paypal which offers full guarantees of security.

You can consult Paypal's privacy policy by clicking on the following link:  
<https://www.paypal.com/va/webapps/mpp/ua/privacy-full>

In accordance with applicable legislation, cookie data will be automatically deleted thirteen (13) months following their placing on the User's terminal.

Finally, the data regarding the identification of the Users in case of exercise of their rights pursuant to Article 6 of the present privacy policy shall be retained for (i) one (1) year in case of exercise of their access or rectification rights and (ii) three (3) years in case of exercise of their opposition right.

#### **ARTICLE 5. OBLIGATIONS OF THE ORGANISATION**

As a data controller and in accordance with applicable legislation and regulations, the Organisation commits to:

- Only collect the Users' data for the strict purpose as described under article 2 of the present privacy policy;
- Keep a processing register;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Increase awareness and train staff members regarding the processing of personal data;
- Guarantee to the Users their rights regarding the access, portability, erasure, rectification and opposition in relation to the collection and processing of their data;
- Notify the competent supervisory authority of any security breach presenting a serious risk regarding the rights and liberties of the Users within 72 hours of the occurrence of such a breach;
- proceed with the deletion of the Users' data in the event of an absence of any contact with the Organisation for a period of three (3) years;

- Only subcontract the processing of the Users' data to Hivebrite which, as subcontractor, has put all necessary technical and organizational measures in order to guarantee the security, confidentiality, integrity, availability and resilience of the processing systems and services.

For any additional information on Hivebrite, you can consult the webpage available at the following address: [www.hivebrite.com](http://www.hivebrite.com).

#### **ARTICLE 6. EXERCISE OF THE USERS' RIGHTS**

The User is duly informed that it disposes at any time, meaning prior to, during or following the processing of data, to a right to access, copy, rectify, oppose, port, limit and delete its data.

The User can exercise its rights by sending an email to the following address [info@wingsweb.org](mailto:info@wingsweb.org) or by mail at the following address Rua da Consolação, 368, 12º andar, conjunto 121, São Paulo/SP, CEP 01302-000, provided that the User justifies its identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can file a reclamation before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

#### **ARTICLE 7. HOSTING OF THE USERS' PERSONAL DATA**

The personal data collected by the Organisation is hosted by the following service providers:

Host	Nature of the hosting
Microsoft Azure Cloud  Privacy policy: <a href="https://www.microsoft.com/en-us/TrustCenter/Privacy/gdpr/default.aspx">https://www.microsoft.com/en-us/TrustCenter/Privacy/gdpr/default.aspx</a>	Hosting of all data and content produced/provided by the User, as well as images, profile pictures and backups
AmazonAWS  Privacy policy:	

<a href="https://aws.amazon.com/compliance/gdpr-center/">https://aws.amazon.com/compliance/gdpr-center/</a>	
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## ARTICLE 8. DATA BREACH

In case of breach of its systems, or theft, deletion, loss, alteration, disclosure, unauthorized access, or any other malicious act, the Organisation commits, in the event the said breach presents a serious risk regarding the rights and freedoms of the Users, to notify the Users, within a period of seventy-two (72) hours as of the occurrence of the breach, of (i) the nature of the breach, (ii) the probable consequences of the malicious act, (iii) the appropriate measures proposed to remedy the malicious act.

The malicious act presenting a serious risk regarding the rights and freedoms of the Users shall be notified to the competent supervisory authority.

The User is duly informed that the Organisation shall not be liable in case of breach of IT security which can cause damages to computer equipment, as well as in case of breach or malicious act by a third party targeting the system or the Platform.

## ARTICLE 9. COOKIE MANAGEMENT CONFIGURATION AND OTHER DATA

The User's consent is requested through a banner at the bottom of the Platform homepage.

In case of consent, the User's internet navigator shall automatically transmit to the Organisation the data collected and detailed under Article 1.2.

The User is informed that the cookies and trackers will be automatically deleted following a period of thirteen (13) months.

The User may at all times configure its navigator in order to prevent the creation of cookie files.

However, certain functionalities of the services proposed by the Platform may not function properly without cookies. In addition, even if most navigators are configured by default and accept the creation of cookie files, the User has the possibility to choose to accept the creation of all cookies other than the functional cookies or to systematically decline them or to choose the cookies it accepts depending on the issuer by configuring the following settings:

- **Internet Explorer:**
  - Click on the settings menu, followed by "Internet Options";
  - Under the "General" tab on the upper-left-hand side, scroll down to "Browsing history";

- Check the "Temporary Internet files and website files," "Cookies and website data," "History," and "Download History" boxes;
- Click on "Delete";
- Closeout of Internet Explorer and reopen it for changes to take effect.
- **Firefox:**
  - Click on your Tools bar;
  - Click on "Preferences";
  - On the menu to the right, select "Privacy";
  - Under the "history option", there is a shortcut titled "clear your recent history", click on that;
  - Select only the top four options and hit clear now.
- **Safari:**
  - Click on "Safari" in the top left corner of the finer bar;
  - Click on "Preferences";
  - Click on the "Privacy" tab;
  - Click on "Manage Website Data";
  - Click on "Remove All";
  - Click "Remove Now".
- **Google Chrome:**
  - Click the Tools menu;
  - Click on "More tools";
  - Clear browsing data;
  - At the top, choose a time range.
  - To delete everything, select "All time";
  - Next to "Cookies and other site data" and "Cached images and files", check the boxes;
  - Click on "Clear data".

In order to configure the data settings, please find below the recommendations of the Organisation:



Data collected for the following purposes:	Settings
General data enabling the proper functioning of the Platform and the improvement of the services proposed by the Platform.	Data that is essential for the provision of services by the Organisation, non-configurable.
Data regarding the management of payment services proposed by the Platform, delinquencies and litigation.	Data that is essential for the provision of services by the Organisation, non-configurable.
Data enabling the creation of User files; Mailing of commercial offers, advertisements or newsletters of the Organisation and/or its commercial partners if this has been accepted by the User.	Management by the User in its login area; Unsubscribing to newsletters / commercial offers by clicking on the appropriate link; Request for deletion of the database of the Organisation by writing to the following address <a href="mailto:info@wingsweb.org">info@wingsweb.org</a> and subject to providing proof of identity.
Compilation of statistics with the purpose of improving the functioning of the Platform notably by analysing the traffic of the Platform (modules which are more or less consulted, preferred routes, level of activity depending on the day of the week et hour of the day, etc.) and by adapting the Platform according to the needs and tastes of the Users (recognition of the User when it accesses the Platform).	Clearance of cookie history in the navigator pursuant to the above instructions; Using the “incognito mode” whilst navigating; Request for deletion of the database of the Organisation by writing to the following address <a href="mailto:info@wingsweb.org">info@wingsweb.org</a> and subject to providing proof of identity.
Management of requests to access, rectify, delete, limit and oppose.	Request for deletion of the database of the Organisation by writing to the following address <a href="mailto:info@wingsweb.org">info@wingsweb.org</a> and subject to providing proof of identity.

## ARTICLE 10. PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

The data of the Users are accessible only to the persons duly authorized to do so by the Organisation for administrative or maintenance purposes of the Platform to the exclusion of any commercial use, and if applicable, in order to enforce the rights exercised by the Users regarding their data (in particular the right to access, rectify, oppose, port and to be forgotten).

The Organisation informs the User that, outside of hosting and payment services, it uses the following subcontractor:

- The Organisation WINGS for its HIVEBRITE solution, registered with the Paris Companies register under the number 75339171300017, having its registered office at 8, rue de la Grande Chaumière, 75006 – Paris.

Especially in light of any future developments of the applicable legislation and regulations, the Organisation reserves its right to proceed with any modification of its privacy policy and commits to duly inform you if any such modification occurs.

Date of privacy policy: November 20, 2020.