

# Ashoka's Privacy Policy

Effective: May 25, 2018

## INTRODUCTION

This privacy policy (this "Privacy Policy") is provided to explain the online information practices of Ashoka ("Ashoka," "us" or "we") and the choices you can make about the way that data which directly or indirectly identifies you ("Personal Data") is collected and used at Ashoka websites (collectively, the "Site"). We are a company established in the United States with principal place of business at 1700 North Moore Street

Suite 2000, Arlington, VA 22209 USA. For the purpose of the General Data Protection Regulation (the "GDPR"), we are the data controller and our representative in the EU is Ashoka Germany, a private limited company, established in the Germany with a registered office at Prinzregentenplatz 10, München, 81675 DE. We use your Personal Data only in accordance with the following principles and in compliance with applicable data protection laws including the GDPR.

The official language of this Privacy Policy shall be in the English language except as required by local law. Any translations of this Privacy Policy shall be for reference purposes only. The terms of this Privacy Policy in the English language shall prevail over any terms of any translations hereof in the event any dispute arises regarding any conflicting terms.

Please read this policy carefully so that you understand your rights in relation to your Personal Data, and how we will collect, use and process your Personal Data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Site. This Privacy Policy is effective as of the effective date listed above and is subject to change as set forth below in "Changes to the Ashoka Privacy Policy."

## INFORMATION WE COLLECT

The Site's web servers collect standard internet log information during user visits to the Site. This information is used to assist with troubleshooting issues with the Site including performance and security related functions. In addition to server logs, the Site also uses the Google Analytics service to help us assess how users access and utilize the Site by collecting bits of information such as statistical usage and telemetry information including an anonymized version of your IP address. This information is used to create aggregate statistics about the operation and use of the Site such as when the Site is accessed, the pages which refer visitors to the Site, and other information that helps us understand how the Site is used and how it might be improved in the future.

Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our Site. This information is used to compile reports and to help us improve our Site. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our Site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

### *Personal Data*

In general, when you visit the Site we only incidentally collection such information as your IP address and/or information about your browser or computing device that enables us to provide you with access to the Site and appropriate content. There are pages, however, on which you need to provide additional Personal Data to register, make a donation, contact us, or conduct other transactions via the Site.

Such Personal Data will include:

- name, address, website address, social media handle, and contact information;

- organization (including the organization’s name, website, phone number, and address), fields of work, languages and location;
- the results of any questionnaires that you agree to respond to.

The Site also enables you to submit Personal Data related to other people, for example to nominate a Fellow. To utilize this functionality, you will need to provide Personal Data, such as name, contact information, location, organization, fields of work, and other related information, to us about persons other than yourself. You will be asked to confirm that you have sought and received consent to share such person’s Personal Data with us prior to submission. Ashoka will confirm this consent within one (1) month of receipt using the provided contact information. In the absence of consent confirmation, Ashoka will delete such Personal Data.

## HOW WE USE THE PERSONAL DATA WE COLLECT

As it is in our legitimate interests to be responsive to you and to ensure the proper functioning of our products and organization, we will use your information to: process donations, provide requested information about our organization, evaluate employment candidates, evaluate Fellow candidates, respond to requests for information or connections with Ashoka staff, and process questionnaire responses submitted by you. We will also use the Personal Data we collect to improve the Site and to ensure the Site’s content is presented in the most effective manner for you and your device; administer the Site, and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes, or to keep the Site safe and secure.

With your consent, we will use your Personal Data to send you information that we think will be relevant to you, including newsletters and marketing information. You may revoke this consent at any time by using any such provided “unsubscribe” link or by contacting us at [privacy@ashoka.org](mailto:privacy@ashoka.org).

We will share Personal Data with our partners, affiliates, consultants, and providers. Our agreements with these entities require that they keep your Personal Data confidential and only use your Personal Data to the extent necessary to perform their functions and not for any other purpose. We also contract other companies and individuals (collectively “Service Providers”) to perform functions on our behalf:

- We use third-party service providers, Click and Pledge and Stipe, to securely process credit card transactions. For more information about Click and Pledge and Stripe’s privacy practices, please see Click and Pledge’s [Privacy Policy](#) and Stripe’s [Privacy Policy](#);
- We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. For more information about Google Analytics privacy practices, see their [Privacy Policy](#);
- We use a third-party provider, Form Assembly, to process form data submitted securely through the site. For more information about Form Assembly’s privacy practices, see their [Privacy Policy](#);
- We use a third-party provider, Salesforce, to manage constituent data that we use to facilitate our communications, record donations, and process nominations. For more information about Salesforce’s privacy practices, see their [Privacy Policy](#);
- We use a third-party provider, DotMailer, to deliver our email communications. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our communications. For more information about DotMailer’s privacy practices, see their [Privacy Policy](#);
- We use a third-party service, Amazon Web Services, to host our website. We incidentally gather standard internet log information to enable us to troubleshoot issues with the site infrastructure. For more on Amazon Web Services’ privacy practices, see their [Privacy Policy](#);
- We use a third-party service, Cloudflare, to secure the Site and speed up performance. For more information about Cloudflare’s privacy practices, see their [Privacy Policy](#);
- We use a third-party service, Jobvite, to provide employment applicant tracking functionality. We gather personal data about applicants applying for employment with Ashoka and ancillary

information such as references that support that process. For more on Jobvite's privacy practices, see their [Privacy Policy](#).

We will take reasonable steps to ensure that these Service Providers keep your Personal Data confidential and only use your Personal Data to the extent necessary to perform their functions and not for any other purpose.

Donations that are made to Ashoka on the Site are processed using a third-party payment system. Credit/Debit card details will be retained by the party providing the payment services and its affiliated bank as deemed necessary by them to process the payment for your donation. Your Credit/Debit card details will be retained by the processor for future transactions only upon your authorization. If you later decide that you do not want such information stored, you may contact us at [privacy@ashoka.org](mailto:privacy@ashoka.org) and we will coordinate with the processor to remove such information.

## **HOW LONG DO WE STORE YOUR PERSONAL DATA?**

We will retain your information as follows:

- technical data (e.g., IP address, device information) incidentally collected when you visit the Site will be retained for 90 days;
- if you sign up for communications from us, we will keep your information until you unsubscribe after which we will retain only that information that will enable us to respect your unsubscribe preference;
- if you donate to us through the Site, we will keep your information to process your payment and to enable us to ensure that transactions can be appropriately processed, settled, refunded or charged-back, to help identify fraud and to comply with anti-money laundering and other laws and rules that apply to us and to our financial service providers.
- if you apply for a position with Ashoka, we will keep your information for a period of time necessary to facilitate the hiring process, and not for greater than two (2) years without reconfirming your consent or as required to comply with a legal action.

At the end of the retention period we may store your information in an aggregated and anonymized format to help us understand historical behaviors and to enhance the Site.

## **HOW WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES**

Ashoka operates globally, and your Personal Data will be transferred to Service Providers located in jurisdictions other than your residence jurisdiction, in particular the United States, for the purpose of providing the services you request. We share your Personal Data with our Service Providers so that they can perform services on our behalf. We require our Service Providers to take appropriate technical and organizational measures to safeguard your Personal Data against loss, theft and unauthorized use, access, or modification.

For users in the EU, we ensure that adequate safeguards are in place when we export your Personal Data out of the EEA, including:

- Model Clauses: The Personal Data that we collect from you will be transferred to, and stored at/processed in the United States by Click and Pledge for the purposes of processing credit card transactions and Form Assembly for the purposes of processing form data under the Commission's model contracts for the transfer of personal data to third countries.
- Privacy Shield: The Personal Data that we collect from you will be transferred to, and stored at/processed by Amazon Web Services, Salesforce, Google Analytics, Jobvite (when applying for employment), Stripe (when making a donation) which comply with the US Department of Commerce's EU-US Privacy Shield and have certified that they adhere to the EU-US Privacy

Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. For more information about the EU-US Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield website.

Except as provided herein, we will not sell any Personal Data that you provide through the Site without your prior written consent.

We will share your information with law enforcement agencies, public authorities, or other organizations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request;
- enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect our rights, property or safety, or those of our users, a third party, or the public as required or permitted by law (including exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your data to the prospective seller or buyer of such business or assets; or
- if we or substantially all of our assets are acquired by a third party, in which case transferred assets will include information held by us about you.

Ashoka will comply with applicable local laws related to your Personal Data and otherwise use reasonable efforts to keep your Personal Data subject to the same protection as it was prior to the transfer. If your Personal Data becomes subject to a different privacy policy, Ashoka will comply with applicable local laws and otherwise use reasonable efforts to notify you of such change.

Residents of California, USA are entitled by law to request an Information Sharing Disclosure. Ashoka will provide you with a notice of your right to prevent sharing of your Personal Data as well as a cost-free means of doing so. To receive such a notice, submit a written request to the address below, specifying that you are requesting your "California Customer Choice Notice".

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

Tracking technologies, for simplicity referred to here as cookies, are designed to collect and store small pieces of information about your browsing activity and are generally used to enable a range of functionalities including session management, multimedia playback, and performance monitoring. When you visit the Site, cookies are set, by us or Service Providers, on your browser to log information about your preferences and Site viewing patterns. You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>. We use cookies for such purposes as:

- Providing you with relevant content;
- Enabling multimedia playback and social media integration;
- Providing session management and security features;
- Improving Site performance and content relevance

For more information about the types of cookies that we use on the Site and how to control them, please consult our Cookie Policy, which can be found at the following link, <https://www.ashoka.org/en/cookie-policy>, and is part of this Privacy Policy.

## **LINKED SITES**

For your convenience, hyperlinks may be posted on the Site that link to other websites (“Linked Sites”). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on the Site. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of any Linked Site that you visit to understand how the information that is collected about you is used and protected.

## **CHILDREN**

The Service is not intended for use by children under the age of 18, and we do not knowingly collect Personal Data from such children. If we become aware that we have unknowingly collected Personal Data from a child under the age of 18, we will make all reasonable efforts to delete such information from our database. If you become aware that we have unknowingly collected Personal Data from a child under the age of 18, please contact us immediately at [privacy@ashoka.org](mailto:privacy@ashoka.org).

## **SECURITY**

The security of your Personal Data is important to us. We use appropriate technical and organizational measures to safeguard your Personal Data against loss, theft, and unauthorized use, access or modification. We encrypt information submitted to and presented by the Site using Transport Layer Security (TLS) technology. By encrypting this data, TLS attempt to prevent anyone from reading it as it travels across the Internet. Unfortunately, the transmission of information via the internet or email is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your information transmitted through the Site or over email; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your Personal Data against loss, theft and unauthorized use, access or modification.

## **YOUR RIGHTS**

You have the right to access the Personal Data that we hold about you. To the extent permitted by applicable law, you also have the right to request the correction or deletion of your Personal Data, to require us to stop processing the Personal Data except for storage purposes in certain circumstances and to obtain a copy of your Personal Data in a commonly used, machine-readable format. You can exercise these rights by contacting us at [privacy@ashoka.org](mailto:privacy@ashoka.org). We may refuse your request for correction or deletion of your Personal Data where its retention is necessary, for example in the context of a legal dispute or as required by law.

Where you have provided your consent for us to process your personal data, you can withdraw your consent at any time by contacting us at [privacy@ashoka.org](mailto:privacy@ashoka.org).

At any time you have the right to object to our processing of Personal Data about you in order to send you marketing, including where we build profiles for such purposes, and we will stop processing the Personal Data for that purpose.

## **COMPLAINTS**

In the event that you wish to make a complaint about how we process your Personal Data, please contact us in the first instance at [privacy@ashoka.org](mailto:privacy@ashoka.org) and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection supervisory authority in the EU country in which you live or work where you think we have infringed data protection laws.

## **CHANGES TO THIS ASHOKA PRIVACY POLICY**

We will revise this Privacy Policy from time to time. If we do so, we will post the new policy on our website and change the effective date, so we encourage you to review it frequently. Your continued use of the Site after changes in this Privacy Policy will mean that you accept such changes except as otherwise required by local law.

## **CONTACT US**

If you have any questions, concerns, or complaints about our use of your Personal Data, or would like to request access to, correction, or deletion of, your Personal Data, please address them to:

Ashoka Innovators for the Public  
c/o Personal Data Privacy Team  
1700 North Moore Street  
Suite 2000  
Arlington, VA 22209  
USA

You may also reach our data privacy team via email at [privacy@ashoka.org](mailto:privacy@ashoka.org).

For visitors in the EU, you can also contact our EU representative at: [rholl@ashoka.org](mailto:rholl@ashoka.org).