

Section 1 Introduction

1.1 This privacy policy (“Privacy Policy”) provides you with information regarding the processing of your personal data carried out by Collective Mind, LLC (“We” or “Us”) via the subscription services (“Services”) provided by Us. We refer to the customer of the Services as “Customer” or “You”.

1.2 Please be aware that no data protection officer is operating in relation to Data Processing carried out by Us.

1.3 When We process your Personal Data on the basis of our legitimate interest, You have the **right to object** to that processing. If You wish to exercise this right, please contact Us at the email contact details specified herein

Section 2 Definitions used in this Privacy Policy

2.1 In this section You can find the definitions for the purpose of this Privacy Policy.

2.1.1 “Personal Data” means any information relating to You through which We can identify You directly or indirectly; this means in particular your name and email address.

2.1.2 “Data Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Section 3 Data Processing Principles

3.1 We process your Personal Data in compliance with all the relevant laws, fairly and in a transparent manner.

3.2 We process your Personal Data only for specified and legitimate purposes as described in this Privacy Policy.

3.3 We do not process your Personal Data, which is not adequate, relevant or necessary for the purposes set out in this Privacy Policy.

3.4 We do our best to keep your Personal Data accurate and up to date. We take every reasonable step to ensure that inaccurate Personal Data is erased or rectified without delay.

3.5 We keep your Personal Data in a form which enables Us to identify You for no longer than needed, for the purposes for which your Personal Data is processed.

3.6 We process your Personal Data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Section 4 Why and how are We processing your Personal Data?

4.1 General

4.1.1 In most cases, We are processing your Personal Data in order to provide You with our Services. However, other purposes may apply (e.g., to fulfil our statutory obligations). Please find detailed information on the purpose and other relevant circumstances of processing categorized by the purposes below.

4.1.2 We will always process your Personal Data in compliance with legal standards on data protection. We provide an adequate level of protection to your Personal Data, even in cases when We transfer your Personal Data outside the European Economic Area.

4.1.3 Please note that in the event of any inquiries coming from state, administrative or investigative authorities, We may be obligated to provide these authorities with your Personal Data.

4.2 Registration

4.2.1 The purpose of processing your Personal Data: offering the Services and carrying out our obligations regarding the Services.

4.2.2 The legal basis for the processing: Our legitimate interest in creating, managing, and being able to provide Services as requested by You.

4.2.3 The categories of Personal Data concerned: Personal Data provided by You, in the course of the registration and consumption of the Services by You.

4.2.4 The period for which the Personal Data will be stored: This data will be deleted in 30 days following the termination of the Services.

4.3 Using the Services

4.3.1 The purpose of processing your Personal Data: We process your Personal Data while You are using our Services. This data is necessary for providing our Services to You, enhancing our Services, payment purposes, as well as for information security purposes.

4.3.2 The legal basis for the processing: Our legitimate interest in creating and managing your accounts and being able to provide Services as requested by You, in improving existing features and developing new functions to remain competitive, being able to collect fees for our Services, providing secure Services and avoiding fraudulent use.

4.3.3 The categories of Personal Data concerned: Personal Data provided by You in the course of the registration, or while You are using Our Services, logged event data, data necessary for invoicing Our Services, and payment.

4.3.4 The period for which the Personal Data will be stored: This data will be deleted in 5 years following the termination of your Services.

Section 5 Business Partners We Use

5.1 To be able to provide our Services to You and to run our business, We share Personal Data with recipients from the following categories: video conferencing tool providers, billing and subscription management providers, payment processors, accounting service providers, security management providers, sales and customer relationship management (CRM) providers, newsletter tool providers, providers of survey tools and online forms, webinar platform providers.

Section 6 Transferring your Personal Data

6.1 Please note that We are using our business partners for business and related support services, and these business partners receive your Personal Data for the purpose of providing Us with such services. Section 5 above describes the categories of business partners We use.

6.2 We ensure that appropriate and suitable safeguards are in place when We transfer Personal Data outside the EEA. Some of these recipients may be located in countries outside the EEA and/or the UK for which the European Commission or UK Government (as and where applicable) has not issued adequacy decisions in respect of the level of data protection in such countries ("Restricted Countries"). For example, the United States is a Restricted Country. Where we transfer your personal data to a recipient in a

Restricted Country, we will enter into appropriate data transfer agreements based on so-called Standard Contractual Clauses approved from time-to-time under GDPR Art. 46 by the European Commission, the UK Information Commissioner's Office, or UK Government (as and where applicable).

Section 7 Your rights regarding the Data Processing carried out by Us

7.1 You have the following rights regarding Data Processing carried out by Us in relation to your Personal Data:

7.2 Right to access

7.2.1 You have the right to request access from Us to your Personal Data processed by Us and obtain information regarding: the purpose of processing; what categories of Personal Data are processed; to whom We transfer or disclose your Personal Data; for what period We process your Personal Data; your rights in connection with Data Processing carried out by Us regarding your Personal Data; your right to lodge a complaint with a supervisory authority regarding the processing; in case We collect your Personal Data from other sources than from You, any available information as to the source; the existence of automated decision-making and related information, including the logic involved, as well as the significance and the envisaged consequences of such processing for You; whether your Personal Data is transferred outside the EEA and regarding the conditions of these transfers.

7.2.2 We will provide You with a copy of your Personal Data processed by Us in case You require Us to do so.

7.3 Right to rectification

7.3.1 You have the right to request Us to rectify your inaccurate Personal Data and to request Us to complete your incomplete Personal Data by means of providing Us with a supplementary statement.

7.4 Right to erasure

7.4.1 We erase any of your Personal Data if You request Us to do so in the event of the following:

- i. your Personal Data is no longer necessary for the purpose concerned;
- ii. You withdraw your consent and there is no other legal basis for the processing;
- iii. You object to the processing and there are no overriding legitimate grounds for the processing;
- iv. your Personal Data has been processed unlawfully;
- v. your Personal Data has to be erased according to relevant laws.

7.4.2 Please note that We are entitled to not erase your Personal Data if it is necessary - *inter alia* - for exercising the right of freedom of expression and information, for compliance with legal obligations, and for establishment, exercise or defence of legal claims.

7.5 Right to restriction of processing

7.5.1 You have the right to obtain a restriction of processing from Us where one of the following applies:

- i. You have contested the accuracy of your Personal Data (You will obtain restriction for a period enabling Us to verify the accuracy of your Personal Data);
- ii. the processing is unlawful and You oppose the erasure of your Personal Data and request the restriction of their use instead;
- iii. We no longer need your Personal Data for the purposes of the processing, but they are required by You for the establishment, exercise or defence of legal claims.

7.5.2 Where processing has been restricted, Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims, or for the

protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

7.6 Right to object to processing

7.6.1 You generally have the right to object to the processing of Personal Data on grounds relating to your particular situation, where the legal basis of the processing activity is our legitimate interest (or the legitimate interest of a third party). We shall no longer process the Personal Data unless We demonstrate compelling legitimate grounds, which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

7.7 Right to data portability

7.7.1 If certain conditions apply, You have the right to receive your Personal Data, which You have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from Us. You also have the right to have your Personal Data transmitted directly from Us to another controller, where technically feasible.

7.8 Right to withdraw your consent

7.8.1 You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on your consent before its withdrawal.

7.9 Our actions

7.9.1 We take actions requested in relation to exercising your above rights without undue delay and in any event within one month of receipt of your request. This period may be extended by two months where necessary, with a reasoned notification to You, taking into account the complexity and number of requests.

7.9.2 In the event when You make such a request by electronic means, We provide You with information by electronic means where possible, unless You request otherwise.

7.9.3 In case We do not take any action regarding your request, We will inform You as to the reasons within one month of the receipt of your request. We will take the necessary actions regarding exercising your rights in relation to the processing free of charge except when your request is manifestly unfounded or excessive.

7.9.4 In case We have reasonable doubts as to the identity of the natural person making the request, We may request additional information necessary to confirm the identity of such person.

Section 8 Remedies

8.1 In case You do not agree with our response or action, or if You consider that your rights have been infringed, You may lodge a complaint with the data protection supervisory authority in the jurisdiction of your habitual residence, place of work or place of the alleged infringement.

Section 9 Miscellaneous

9.1 Please note that We review this Privacy Policy on occasions and amend it as necessary at our sole discretion.

California Consumer Privacy Act (“CCPA”) Disclosure

If you are a California resident, you may have certain rights under the CCPA regarding your personal information, including:

- The right to request:
 - whether we collect and use your personal information;
 - the categories of personal information we collect;
 - the purposes for which the collected personal information is used;
 - whether we sell your personal information to third parties;
 - the categories of personal information that we sold or disclosed for a business purpose;
 - the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
 - the business or commercial purpose for collecting or selling personal information.
- The right to request deletion of your personal information, subject to certain exceptions provided by law
- The right to request that we opt you out of the sale of personal information
- The right to non-discrimination for the exercise of a consumer's privacy rights

To exercise one or more of your rights, you may call us at +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org.

The following information shows the types of personal information we may collect about California residents who are subject to the CCPA, the sources from which we collect it, and the ways in which we use it and disclose it (if any).

1. Categories of Personal Information

- *Anonymous Electronic Information*—such as the IP address of your computer or mobile device and information regarding your interaction with our webServices
- *Personal Identifiers*—such as first and last name, telephone number, and email address

2. Sources of Personal Information

- We obtain your personal information when you provide it to us (e.g., when you contact us, subscribe to a newsletter, or some other form of periodic communication)
- We collect personal information via standard Internet technology (e.g., tags, web beacons, “cookies,” and other similar technologies)

3. Business and Commercial Purpose for Use of Personal Information

- *IT operations*—such as helping with diagnosing problems with the Services, administering and improving the Services, measuring and evaluating the Services
- *Improving services*—such as enabling us to customize the services we offer our visitors to the Services; deliver targeted content and advertisements; and measure the overall effectiveness of our online advertising, content, programming, and other activities.
- *Operation of our Services*—such as responding to your inquires; customer service; processing your subscription notices; marketing; research; developing and displaying content tailored to your interest; providing product, promotional, and other information to contact you, and contacting you regarding administrative notices.
- *Research*—such as evaluating existing products, services, and systems; assisting in the development of new products or services; advertising; and identifying trends and changes

4. Categories of Third Parties to Whom Personal Information is Disclosed

- Business partners
- Affiliates and relates entities
- Vendors

- Marketing Partners
- Advertisers
- Service Providers
- Governmental, legal, regulatory, or other similar authorities, in response to a subpoena, search warrant, court order, or other legal process, upon request or where required
- Any relevant third party, in the event that we are reorganized, become part of another organization, or we sell or transfer all or any relevant portion of our business or assets.
- Other third parties, if there is a perceived threat to personal safety, property, or rights of any person or organization or to protect and defend our rights or property or those of an affiliate(s), business partners, or others

5. Sale of Personal Information

We do not engage in the sale of personal information as contemplated by the CCPA. As noted elsewhere in this disclosure, we disclose personal information to other businesses for a variety of reasons. While we may benefit from such disclosure, we do not disclose personal information for the sole purpose of receiving compensation for that information.

6. Retention of Personal Information

We will keep your personal information for as long as it is necessary for the purposes set out in this disclosure unless a longer retention period is required by law. When we no longer have a legitimate business need to process your personal information, we will either delete or anonymize such information, or if not possible (e.g., your personal information has been stored in backup archives), then we will securely store your personal information until deletion is possible.

7. Changes to Disclosure

We may update this disclosure from time to time at our sole discretion.

Nevada Privacy Disclosure

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about Nevada residents' privacy rights, please visit <https://www.leg.state.nv.us/nrs/nrs-603a.html>. Nevada's privacy law (N.R.S. § 603A.300 to 603A.360) provides its residents with a limited right to opt out of certain personal information sales. Residents who wish to exercise this sale opt-out right may submit a request to +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org. However, please know we do not currently sell any data which would trigger the statute's opt-out requirements.

Virginia Consumer Data Protection Act ("VCDPA") Disclosure

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about Virginia residents' privacy rights, please visit <https://law.lis.virginia.gov/vacode/title59.1/chapter53/>. Virginia's privacy law (VA Code Ann. § 59.1-577) provides its residents with the following rights:

- The right to confirm whether or not a controller is processing the consumer's personal data and to access such personal data;
- The right to correct inaccuracies in consumer's personal data;
- The right to delete personal data provided or obtained about the consumer;
- The right to obtain a copy of the consumer's personal data that the consumer previously provided to the controller; and

- The right to opt-out of the processing of personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

Residents who wish to exercise any of the foregoing rights may submit a request to +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org. To appeal a decision regarding a consumer rights request, please contact us with the subject line shown as “Consumer Rights Appeal” and provide us with your name, contact information, and a detailed description of the basis for your appeal.

Colorado Privacy Act (“CPA”) Disclosure

State consumer privacy laws may provide their resident with additional rights regarding our use of their personal information. To learn more about Colorado residents’ privacy rights, please visit Colorado’s privacy law (C.R.S.A. § 6-1-1306) provides its residents with the following rights:

- The right to opt out of the processing of personal data concerning the consumer for purposes of (i) targeted advertising, (ii) the sale of personal data, and (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer;
- The right to access and confirm whether a controller is processing personal data concerning the consumer;
- The right to delete personal data concerning the consumer; and
- The right to obtain the personal data in a portable and readily usable format that allows the consumer to transmit the data to another entity without hindrance;

Residents who wish to exercise any of the foregoing rights may submit a request to +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org. To appeal a decision regarding a consumer rights request, please contact us with the subject line shown as “Consumer Rights Appeal” and provide us with your name, contact information, and a detailed description of the basis for your appeal.

Utah Consumer Privacy Act (“UCPA”) Disclosures

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about Utah residents’ privacy rights, please visit <https://le.utah.gov/~2021/bills/sbillint/SB0200.pdf>. Utah’s privacy law (U.C.A. 1953 § 13-58-202) provides its residents with the following rights:

- The right to confirm whether a controller is processing personal data concerning the consumer and obtain information regarding the categories of personal data concerning the consumer collected;
- The right to correct inaccurate personal data concerning the consumer;
- The right to delete the consumer’s personal data that the consumer provided to the controller;
- The right to obtain a copy of the consumer’s personal data that the consumer previously provided to the controller in a format that is (i) portable, (ii) to the extent practicable, is readily-usable, and (iii) allows the consumer to transmit the data to another controller without impediment where the processing is carried out by automated means;
- The right to opt out of the processing of the consumer’s personal data for purposes of: (a) targeted advertising, (b) the sale of personal data, (c) profiling in furtherance of decisions regarding: (i) enrollment in an educational institution; (ii) criminal justice, (iii) employment opportunities, (iv) health care services, or (v) access to basic necessities.

Residents who wish to exercise any of the foregoing rights may submit a request to +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org.

Connecticut Data Privacy Act (“CDPA”) Disclosures

State consumer privacy laws may provide their resident with additional rights regarding our use of their personal information. To learn more about Connecticut residents' privacy right, please visit <https://portal.ct.gov/AG/Sections/Privacy/The-Connecticut-Data-Privacy-Act>. Connecticut's privacy law (P.A. No.22-15, S.B. No.6) provides its residents with the following rights:

- The right to confirm whether or not a controller is processing the consumer's personal data and accessing such personal data;
- The right to correct inaccuracies in the consumer's personal data;
- The right to delete personal data provided by or obtained about the consumer;
- The right to obtain a copy of the consumer's personal data processed by the controller in a portable and, to the extent feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance;
- The right to opt out of the processing of the personal data for purposes of (a) targeted advertising, (b) the sale of personal data, or (c) profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning the consumer.

Residents who wish to exercise any of the foregoing rights may submit a request to +1 314 497 6926 or contact us at kerstin@collectivemindglobal.org. To appeal a decision regarding a consumer rights request, please contact us with the subject line shown as "Consumer Rights Appeal" and provide us with your name, contact information, and a detailed description of the basis for your appeal.