

# Privacy Policy

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**Last updated: January 05, 2022**

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use our website. The term “personal data” comprises all data that can be used to personally identify you, such as your name, your mailing address, your email address, your location, and your IP address.

This Privacy Policy aims to lay out:

- The way your personal information is collected and processed
- Your rights regarding your personal information
- Who is responsible for the processing the collected information
- To whom the information is transmitted
- Wherever applicable, the website’s usage of cookies

## Collecting and Using Your Personal Data

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### Types of Data Collected

#### Personal Data

While signing up for our newsletter, updates, programs or services, or when completing a survey, we collect the following:

- First name
- Last name
- Email address
- Communication preference
- Location based cookies

When signing up for a program or service with a payment component, we collect the following through Paypal or Stripe (the individual Terms & conditions for each program’s payment page will clarify who the third-party payment provider for that instance is):

- Credit card number

We use the collected data for the following purposes:

- Statistics
- Updating our contacts list
- Providing you with the service or program you signed up for
- Managing website content

### Usage Data

Usage Data is collected automatically when using the website, to process statistics and information on traffic, to ease navigation and to improve your experience when interacting with our website..

We may also collect information that your browser sends whenever you visit our website or when you access it through a mobile device.

### Tracking Technologies and Cookies

The cookie files used on the website are:

- IP address
- Operating system
- Pages visited and queries

Cookies from the following third parties may be saved on your hard disk

- Google
- Stripe
- Paypal
- Zoho
- Squarespace
- Buffer
- LinkedIn
- Facebook
- Twitter

These websites have their own Privacy Policy, and terms and conditions, that may be different from ours. We invite and encourage you to review the policies and information provided on their websites.

The Venn Innovation website is hosted by an external service provider (host), Squarespace. Personal data collected on this website are stored on their servers. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract

information, contact information, names, web page access, and other data generated through a web site.

We also include our website links on our social media posts. Cookies and log files from the social media networks may be saved on your computer when you visit a page on our website, via a social media post.

### **Retention of Your Personal Data**

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our services, or when we are legally obligated to retain this data for longer time periods.

### **Objection to the use of cookies and log files by the website**

You have the rights to object to the recording of these cookies and log files by configuring your web browser. Once you have deactivated cookies and log files, you may continue your use of the website. However, any malfunction resulting from this deactivation may not be considered of our making.

### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed on our [host \(Squarespace's\) servers](#) and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Our website host may be contacted [via this form](#).

### **Right to object, and Right of access, of rectification and of removal:**

(Art. 21 GDPR & PIPEDA)

On the basis of ART 6 SECT 1 LIT. E OR F GDPR & PIPEDA, you have the right to, at any time, object to the processing of your personal data on the grounds arising from your unique situation. This also applies to any profiling based on these provisions. If you log an

objection, we will no longer process your affected personal data, unless we are able to present compelling protection-worthy grounds for the processing of your data, that outweighs your interest, rights and freedom, or if the purpose for processing is the claiming, exercising or defense of legal entitlements (Objection pursuant to ART. 21 SECT. 1 GDPR & PIPEDA).

If your personal data is being processed in order to engage in direct advertising, you have the right to, at any time, object to the processing of your affected personal data for the purposes of such advertising. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will, subsequently, be longer used for direct advertising (Objection pursuant to ART. 21 SECT. 2 GDPR & PIPEDA).

### **Right to log a complaint with the competent supervisory agency**

In the event of violations of the GDPR & PIPEDA, data subjects are entitled to log a complaint with a supervisory agency, in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

### **Right to demand processing restrictions**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. The right to demand restriction of processing applies in the following cases:

- Should you choose to dispute the correctness of your data archived by us, we will usually need some time to verify this claim. While the investigation is in progress, you have the right to demand that we restrict processing your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of said data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand a restriction to processing your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR & PIPEDA, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you wish to exercise the right to object, consult, modify or withdraw from having your information saved or processed by us, submit a request to [info@venninnovation.com](mailto:info@venninnovation.com)

## Disclosure of Your Personal Data

### Business Transactions

If Venn Innovation is involved in a merger, acquisition or asset sale, your personal data may be transferred. At that point, it will become subject to a different Privacy Policy.

### Law enforcement

Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Other legal requirements

The Company may disclose your personal data in good faith that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with a service or program we offer
- Protect the personal safety of our team, users, clients, members, partners, or the public
- Protect against legal liability

## Security of Your Personal Data

The security of your personal data is important to us. However, remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

# Children's Privacy

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Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and are aware that your child has provided us with personal data, please contact us.

## Links to Other Websites

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Our website may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review their Privacy Policy to learn what data and information they collect, store or process.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## Changes to this Privacy Policy

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We reserve the right to modify our Privacy Policy in order to guarantee its compliance with the applicable law. You are therefore invited to regularly consult our Privacy Policy to be informed of the latest changes.

## Acceptance of our Privacy Policy

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By using our website, you certify that you have read and understood this Privacy Policy and accept its conditions. By doing so, you also specifically accept the conditions relating to the collection and processing of personal information, and to the use of cookies. If you have any questions, contact us via email: [info@venninnovation.com](mailto:info@venninnovation.com)