

# Privacy Policy

## Privacy Statement (effective May 25th, 2018)

Kantara Initiative Inc is a global non-profit industry member association incorporated in the US as a 501(c)(6) entity. Separately, but operating this privacy policy is the Kantara Initiative Educational Foundation Inc incorporated in the US as a 501(c)(3) and Kantara Initiative Europe, a non-profit industry association incorporated in Estonia. Its overall mission in each case is to improve the trustworthy use of digital identity and personal data through innovation, standardization and good practice.

### Scope & Purpose of this Notice

This statement describes how Kantara collects, uses, shares, secures and disposes of information that it collects about people who visit Kantara's publicly facing web sites, opt in to receive Kantara communications, download its published artefacts, support pledge campaigns, join or otherwise participate in its workshops, work & discussion groups in person, via email, phone, web & collaboration wiki and subscribe to it as members, unless another site specific notice is posted. If a site-specific notice is posted that notice will apply to that site. Kantara acts as the data controller and to a lesser extent as the data processor.

#### Web site

The purpose of this web site is to provide visitors and users with information regarding the Kantara Initiative, its objectives and activities, its members and its deliverables. It also attempts to provide recent and pertinent news about the Kantara Initiative as well as access to materials developed by the Kantara Initiative. This web site also provides a mechanism for organizations and individuals to join the Kantara Initiative.

### The Information We Collect

We collect both personally identifiable and non-personal information about you. When you land on a web page, your browser provides technical and other information to the web server. The Kantara Initiative, entities that may operate web services on its behalf and the technical infrastructure that enables those services collects information provided by your browser and, on request, yourself. Some of this information is personally identifiable information. "Personally Identifiable information" (PII) means information that by itself, or in combination with other information, will identify you. "Non-personal information" means information that does not directly or indirectly identify you, and includes PII that has been de-identified or anonymized.

[Note: Some jurisdictions and some regulators use the terms "Personal Information", or "Personal Data" instead of, or as well as, "Personally Identifiable Information". For the purposes of implementing the commitments made in this statement, the Kantara Initiative will use the broadest definition appropriate in the context to ensure that information about you is protected].

### How We Collect Information

We may collect information from you in the following ways:

- **By Asking** – The Kantara Initiative may collect information from by asking that you provide it, often by way of an paper or online form. Depending on the information and/or services you request, we may ask for information including your name, e-mail address, company name, title, address, phone , and similar information.
- **Cookies** – Many sites use "cookies", which are small text files that reside on your computer to identify you as a unique user. We may use cookies on our web site to allow us to, among other things, measure activity and to personalize your experience. For instance, cookies may enable us to remember your viewing preferences without requiring you to re-type a username and password. Cookies may also allow us to track your status or progress when requesting products, services, or information. These cookies can sometimes be linked to contact information, but this information cannot be viewed by other parties and is not shared. If you choose, you can set your browser to reject cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features that are currently on our web site, or that we may put on our web site in the future.
- **Analytics** – The Kantara Page uses Google Analytics for the purposes of understanding and tracking web site usage. For more information on Google Analytics please visit Google's Analytics Help Site for data privacy and security: <https://support.google.com/analytics/answer/6004245?hl=en> The Kantara Initiative does not use Google Analytics Advertising Features and therefore only uses first party cookies.
- **Web Beacons** – A web beacon is an electronic file on a Web page that allows us to count and recognize users who have visited that page. Among other things, a web beacon can be used in HTML-formatted email to determine responses to our communications via the Emma marketing email and measure their effectiveness – for instance, the web beacon can tell if you get an email from us then click on a link in that email to go to our website. You can generally avoid web beacons in email by turning off HTML display and displaying only the text portion of your email. Web beacons may also provide the type of information provided by cookies concerning your use, preferences, and activity on a web site.
- **Web Server Logs** – The computers that deliver our web pages to you may record information. For example, a web server log may record the search terms you enter on our web sites, the link you clicked to bring you to the web page, your IP address, or cookies that are set on your browser. By and large this and similar information does not enable us to identify individuals. Where such identification is possible we treat those data as PII.
- In general, you can visit Kantara Initiative's web pages without telling us who you are or revealing any personal information about yourself.

### Do Not Track Disclosure

Do Not Track (DNT) is a preference that a user can set for their browsers to opt-out of the online tracking activities used by some web sites. Kantara does not track its visitors or users across third party web sites and thus does not respond to Do Not Track (DNT) signals in browsers.

### How We Use & Disclose Information and our lawful bases for processing

We may use your information:

- To respond to your requests through the exchange of business cards, emails, providing your details on workshop attendance sheets to provide you with further information about Kantara Initiative, including membership, sponsorship, services, opportunities, pledge campaigns, events, news and new developments, joining groups, downloading publications and communications from Kantara Initiative and its members. Lawful basis for processing; Legitimate Interest.
- To provide you with personalized content. Lawful basis for processing; Consent
- For staff of Kantara Initiative to list individual member and company names in a public website directory or a collaboration wiki. Lawful basis for processing; Legitimate Interest.
- To create contact lists in a participants-only area where all participants have agreed to the Group Participation Agreement governing the Group to permit working group members to contact each other. If you participate in a Kantara Work or Discussion Group you will be included on mailing lists. Lawful basis for processing; Legitimate Interest.
- To give our web site developers information that may be useful for developing new features to improve the content, navigability of the website and the overall online user experience. Lawful basis for processing; Legitimate Interest.
- If required to do so by law, court order or other government or law enforcement authority or regulatory agency; when we believe in good faith that disclosing this information is necessary or advisable, including, for example, to protect the rights, property, or safety of Kantara Initiative, our members, users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. Lawful basis for processing; Legal Obligation.

Unless otherwise specified mailing list archives are available on the Kantara web site for an indefinite period. Anything you post to a Kantara List, including email header information, should therefore be understood to be disclosed and in the public domain.

Kantara Initiative will not share your personally identifiable information to any company not a member of Kantara Initiative unless it is:

1. at your request,
2. to outsource one or more of the functions described in the previous section, or
3. with the proper authorities in response to a legal order or official request.

## **Cross-Border Sharing of Information:**

Kantara Initiative Inc is an industry association of individuals, organizations, and companies operating globally. Please note that while the web site is hosted in the United States and mirrored in other locations, data collected on the web site may be transferred to, and stored or processed in, other countries, including countries where Kantara Initiative members are located. Laws of these other countries may not be the same as the laws regulating the use and transfer of personal data in your country. By entering your personal information on this web site, you are consenting to the transfer of that information to the United States or to other countries for the purposes described in this privacy statement.

## **Children:**

The Kantara Initiative together with its physical and online activity is not directed to children. We do not intentionally collect personal information from anyone we know to be under 16 years old.

## **Other websites:**

The website may contain links to third-party websites. Kantara Initiative is not responsible for the privacy practices or the content of such websites. You are encouraged the review the privacy policies of the websites you visit.

## **Choice & Consent**

### **How you can decide what communications you will receive:**

You may opt-out from Kantara Initiative Public Mail Lists if you do not wish to receive further marketing communications from Kantara Initiative. We will use reasonable efforts to process any change you make as promptly as possible.

Kantara provides notice as to the purposes for which personal information is collected, used, retained, and disclosed. Kantara describes choices available to you and obtains explicit consent where applicable. By using the website and the services provided by Kantara, you are consenting to the collection, use, disclosure and sharing of your personal information as described in this statement.

If you decide you do not want to receive marketing communications emails from Kantara you can "opt-out" by clicking on the "Opt out" link provided at the bottom of every marketing communications email or by clicking [here](#) and entering into the Subject field "Unsubscribe from marketing communications emails".

## **Retention and Disposal**

Kantara retains personally identifiable information only as long as necessary to fulfill the stated purposes or as legally required and thereafter appropriately disposes of such information

## **Access and Quality**

Unless Kantara is permitted or required by law to prohibit access, you may view and if necessary, update or correct the information that you've entered about yourself on this site. To ensure that you have as much control over your personally identifiable information as possible, we allow you to view, update, revise or delete the information you provide by updating your Profile via the top right menu next to the 'search' in the Wiki, in myaccount2 civicrm system, via [idp.kantarainitiative.org](http://idp.kantarainitiative.org) and [kantarainitiative.org/mailman/listinfo](http://kantarainitiative.org/mailman/listinfo) OR by [contacting us](#) for assistance. We will use reasonable efforts to process any change you make, or your request for deletion, as promptly as possible.

## How We Protect Information:

Kantara Initiative attempts to protect against the loss, misuse and alteration of your personally identifiable information. We have a strict internal security policy that limits access to production systems and personal information only to authorized personnel. Our servers are protected by reasonable physical and electronic security. Even so, no security system is perfect and we cannot promise, and you should not expect, that your information will remain secure in all circumstances. Kantara transfers personal information outside of a local jurisdiction only with adequate protections in place and in compliance with applicable laws and standards.

## Customer Service

### Privacy Statement Changes:

Due to the constantly changing nature of the Internet, we reserve the right to change, update or modify this statement at any time and will post any new privacy statement or related policy on the website. Minor changes to the statement or related policy may occur that will not affect our use of your information. When the privacy statement or related policy changes in a way that significantly affects the way we handle your personal information, we will not use the information we have previously gathered without notifying you and offering you a choice concerning any new uses of your information. We will post privacy statement and related policy changes on the web site in a timely manner. Any such change, update or modification will be effective immediately upon posting on the web site. Use of information that we gather will be subject to the privacy statement and related policy in effect at the time of use. [See earlier privacy statements or policies here.](#)

### How to Contact Us:

If you have any questions, concerns, or suggestions regarding this privacy statement or related policy, please [contact us](#) directing your query to the Chief Privacy Officer.

Acknowledgement: Kantara Initiative Inc thanks John Wunderlich [@PrivacyCDN](#) for his assistance.

For the previous Privacy Policy [click here.](#)