World Learning Inc. Data Privacy and Cookie Policy

Introduction

World Learning Inc. and its programs—Global Development and Exchange, School for International Training (SIT), SIT Study Abroad, SIT Graduate Institute, and The Experiment in International Living—understand the value and importance of individual privacy. We are strongly committed to protecting the privacy of our constituents. Our websites reflect that commitment, and we comply with applicable legislation concerning privacy such as General Data Protection Regulations (GDPR). These websites include worldlearninginc.org, worldlearning.org, sit.edu, graduate.sit.edu, studyabroad.sit.edu, and experiment.org.

This Data Privacy and Cookie Policy will tell you:
- What information we collect;
- How we use the information;
- How we collect this information;
- What we do with the information;
- How you can unsubscribe;
- How data is protected; and
- If we make future changes to our Data Privacy and Cookie Policy.

We may make changes to this Policy from time to time and we will inform you if we do. Notification will be through an appropriate medium of communication, such as email, text, written notice, and/or website notice, depending on the contact information that we have for you. You can find the current version of this Policy on the World Learning Inc. website. If you have any questions about this Policy, please contact our Data Protection Officer ("DPO"), at DPO@worldlearning.org or DPO@sit.edu. Our DPO will be happy to answer any queries you have concerning this Notice or the way in which we process or use your personal data.

Please read this Policy carefully. By opting in and using our websites, you acknowledge that you understand and agree to the terms of this policy, and consent to the manner in which we may collect, use, and disclose your personal information. If you do not agree to the terms of this policy, please unsubscribe and do not use our websites.

What information do we collect?

Non-Identifying Information (Usage Information)

On our websites, we track the following usage information:

- your IP address;
- the URLs you have requested to access;
- the dates, times, and methods of requests;
- the status code of your requests;
- URLs of pages that referred you to the Site;
- number of bytes transferred; and
- your web browser and operating system platform.

This information is retained on a permanent basis, during which time the contents are accessible to our website administrators. We have no way of linking IP addresses to any personally identifiable information. This means that user sessions will be tracked by IP address, but a user's identity will remain anonymous.

Personally Identifying Information

Users may voluntarily opt to share their personal data to request information, register for open houses, or apply to our programs. This information may include email address, name, physical address, and other data needed to address the purpose being requested. We do not use cookies to maintain this information. This data is encrypted and sent to our databases, and after you have left our site, it is not maintained or shared on our website or in your browser.

Below is a list of information that we may collect, for legitimate business purposes, depending on your relationship with World Learning Inc.

- Date of Birth
- Gender
- Contact data (email, phone number, address, country)
- Academic information—majors, universities, transcripts
- Passport data
- Visa information
- Self-disclosed health data, including immunization data
- Travel information
- Social Security number or international ID data
- Credit card information
- Bank account information
- Job title
- Company or employer
- Emergency contact
- Social media handles (voluntary)
- Racial/ethnic background (voluntary)
- Religion & sexual orientation (if voluntarily disclosed)

- Genetic/biometric data (only when required for certain visa applications)
- Criminal convictions & background checks
- Health, disciplinary, and academic status of students (only when needed while on program, and with verbal or written consent of student/ participant)
- Background or police check
- Occupation
- Family member names
- Resume
- Tax ID number
- Insurance number
- Employment history, references, other employment related documents
- Office contact information
- Business card data
- Proof of self-employment status

How is this data used?

For marketing, admissions, communication, travel arrangements, registration with Smart Traveler Enrollment Program and/or local authorities, security clearances, support to students & participants, responding to emergencies and other student and participant needs, planning program activities, billing, visa applications, managing housing, managing emergencies (including medical emergencies), diversity metrics, tracking student academic progress, for payroll and provision of benefits, compliance, registration, reporting and program banking, payment for fees and services, communication and scheduling of program activities, excursions & lectures, internship placements, paying employees, complying with government requirements, ensuring appropriate experience for role, purchasing supplies and services.

Alumni Data Management

World Learning Inc. maintains and processes data of alumni and participants whose programs have ended (Alumni Data) in order to engage these individuals in meaningful ways to foster long term engagement with, and support for, World Learning Inc.'s ongoing mission and purposes.

Processing Alumni Data

Alumni Data is used for purposes consistent with World Learning Inc.'s charitable, educational mission including:
- Promoting events, programs, services, and other engagement opportunities including alumni benefits and opportunities to engage with SIT, The Experiment in International Living, and World Learning Global Development and Exchange Programs;
- Sharing World Learning/SIT news and information;
- Fundraising outreach and associated giving capacity research to support World Learning/SIT priorities and programs, including administrative tasks associated with processing donations, issuing tax receipts and other donor stewardship activities;

- Conducting research and analysis to better understand alumni attitudes, interests, preferences, and post-graduation employment and successes to inform World Learning/SIT strategic engagement and target communications more effectively;
- Performing internal record keeping, including address/contact verification and management of any feedback or alumni requests for records or information; and
- Providing access to sit.edu email addresses in accordance with associated policies and procedures.

Sharing Alumni Data

World Learning/SIT does not sell Alumni Data or information about our alumni or donors.

In order to perform the activities and functions listed herein, it may be necessary to share Alumni Data with volunteers, students, and employees involved in supporting World Learning/SIT and its mission. All individuals performing such activities are informed of appropriate handling of Alumni Data and are subject to confidentiality policies and/or agreements.

World Learning/SIT may also share Alumni Data with third-party service providers such as: Predictive Response, Graduway, NCOA, Leadership Connect, Wealth Engine, and Constant Contact to assist in the review, retrieval, and analysis of data as well as communications across a range of print and electronic platforms. In any such engagement contracts are carefully reviewed to ensure suitable and compliant data protections.

How do we collect information?

World Learning Inc. obtains your personal data from you when you provide us with your personal information, such as (but not limited to) when you fill out any form or application, when you interact with our website or staff, or when you communicate with us in any way. In addition, we obtain your personal data from various third-party sources (for example, student loan administrators, other institutions that we partner with in providing our programming, your other academic institutions, and other service providers). All such information obtained about you is handled in accordance with our policies and with DPA and GDPR, as well as FERPA and other applicable legislation.

Cookies

Cookies are unique bits of text that many websites write to your computer the first time you visit.

Cookies are stored on your hard drive and may later be accessed by the website to track prior usage. As further explained below, Google Analytics will install a cookie on the hard drives of site visitors.

There are two types of cookies. One is session cookies, which expire when you close your browser or after a short time period. The other is advertising cookies, which stay on your hard drive, and will be used to show you advertising for our programs when visiting other sites.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies, though either of those actions may affect the use of our sites.

Web Beacons

A web beacon is a transparent graphic image placed on a web page or in an email, which indicates that a page or email has been viewed or that an email has been forwarded. In addition, a web beacon allows third parties to obtain information, such as the IP address of the computer that downloaded the page on which the beacon appears, the URL of the page on which the beacon appears, the time the page containing the beacon was viewed, the type of browser used to view the page, and the information in cookies set by the third party. A web beacon may also tell your browser to get content from another server.

We may also include web beacons (also known as web bugs, internet tags, pixel tags, tracking pixels, and clear GIFs) with the content and advertisements that we deliver to you, which we will use to collect information regarding your interaction with our content and advertisements appearing on our websites.

User Forms

If you opt to share your personal data, this is done with the use of encrypted user forms using Secure Socket Layer (SSL) technology.

When users fill in our inquiry forms or online applications, we do not use cookies to track this activity. We use only session variables, which are stored in volatile memory, and which disappear when the session ends.

Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page.

What do we do with the information?

Communicating with our Constituents

World Learning Inc. will use your personally identifying information to communicate with you regarding the reasons you contacted us, or your alumni status. We will not share your usage information with any third party outside of our organization unless it is necessary to fulfill your request or provide services to you.

Google Analytics

World Learning Inc. uses Google Analytics software to perform site usage analytics. Google Analytics collects anonymous information from users to help World Learning Inc. track site usage and referrals from other websites. These data are used primarily to optimize the website experience for our visitors, but we may use the data as well to assist us in developing marketing plans for the site.

Information collected and processed by Google Analytics includes the user's IP address, network location, and geographic location. Google Analytics acquires all its information directly from the user, by installing a cookie (see below) on the user's computer. Google Analytics does not collect any personally identifying information such as names, contact information, Social Security numbers, or financial information. If you furnish personally identifying information with the site, the site does not share any personally identifying information it collects with Google, and accordingly, we cannot use any information acquired by Google Analytics to contact you directly.

Remarketing

We work with a company called AdRoll, an online ad network, which assists us in advertising our programs. AdRoll may place anonymous cookies on your computer, and use similar technologies, in order to understand your interests based on your (anonymous) online activities, and thus to tailor more relevant ads to you. You can review AdRoll's Privacy Policy on its website for more information. If you do not wish to receive such tailored advertising, you can visit this page to opt out of most companies that engage in such advertising. (This will not prevent you from seeing ads; the ads simply will not be delivered through these targeting methods.)

Disclosure

Your data may be communicated, in compliance with applicable law, to World Learning Inc. affiliates and partners, public or private subjects to whom they may be necessary in order to fulfill obligations, regulations, or laws; sensitive data may be communicated to public bodies and authorities (such as public hospitals, public safety authorities, police offices, courts, magistrates, and the like) and to private subjects (such as private hospitals and clinics, security supervisors, and insurance companies) only for purposes relating to health and safety emergency and for the purposes of fulfilling obligations set forth by local laws, regulations, and EU laws.

We will not sell, lend, or disclose to third parties any information collected from visitors, except as disclosed in this Privacy Policy or in the event we are required by law to do so. We may disclose information to employees, consultants, and agents who have a legitimate need to know the information for the purpose of fixing or improving the websites and monitoring and improving the security of our network. We also reserve the right to disclose this information when special circumstances call for it, such as when disclosure is required by law or court order or when disclosure is, in our sole discretion, necessary to protect our legal rights, including intellectual property rights. World Learning Inc. may securely share or transfer your information within World Learning Inc.'s affiliate network (for example, to study abroad offices, development projects, and partners in other countries) in order to effectively operate our programs.

Other Websites

Our websites may contain links to other web resources, including websites of organizations other than World Learning Inc. Other websites to which our sites link may also collect user-identifying information directly from you once you proceed to browse those sites. We are not responsible for the privacy policies of our advertisers, sponsors, vendors, or other sites or businesses to which we provide hyperlinks or access. Please visit the relevant sites to review their privacy policies.

What choices can you make regarding this information?

Cookie Settings

You may modify the use of cookies in your browser. You may turn off cookie functionality entirely (this may affect the use of our websites) or set your browser to notify you when a cookie is being written to your hard drive.

Your Access to Information

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via email at DPO@worldlearning.org or DPO@sit.edu:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

Requests to Revise Information, Unsubscribe, or Delete Information

You may request to revise your information, unsubscribe, or delete your information at any time. You can withdraw your consent to use your information at any time, but this will not affect the lawfulness of processing your personal data based on your consent before withdrawal.

How is the data protected?

Data Security

We take precautions to protect your information. When you submit sensitive information via our websites, your information is protected both online and offline.

Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information.

The computers/servers in which we store personally identifiable information are kept in a secure environment.

We have in place physical, electronic, and managerial procedures to protect the information we collect online. However, as effective as these measures are, no security system is impenetrable. We cannot completely guarantee the security of our database, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet.

Will we make future changes to our Data Privacy & Cookie Policy?

Notification of Changes to Privacy Policy

We will review our security measures and Privacy Policy on a periodic basis, and we may modify our policies as appropriate. We may also change or update our Privacy Policy if we add new services or features. If any changes are made, we will make appropriate amendments to this policy and post them at our websites. We encourage you to review our Privacy Policy on a regular basis.

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