

Privacy Policy

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Conservation X Labs, having its registered office at 1066 31st St NW, Washington, DC, 20007, United States ("CXL" or "we" or "us" or "our"), is a non-profit organization acting in the field of conservation technology. We are committed to safeguarding across the organization the privacy of our clients, job applicants, website users, subscribers, and donators ("you") and to protecting the personal information you share with us.

This Privacy Policy applies to the processing of personal information by CXL, acting as a controller, in connection with:

- your use of our websites, domains, and subdomains, including <u>www.conservationxlabs.com</u>, <u>www.sentinel.conservationxlabs.com</u>, <u>wildme.org</u>, and <u>wildbook.org</u>, whiskerbook.org and any online services offered through the websites (collectively, the "Site");
- the solutions offered by CXL to its clients;
- recruitment;
- donations:
- communication with you, including to respond to your inquiry, inform you about our solutions and events, and send you our newsletters.

This Privacy Policy explains the types of personal information collected by CXL, and how such information may be collected, processed, utilized, maintained or shared.

Collection of Personal Information

CXL processes "Personal Information" regarding (i) its clients' representatives when using our solutions, (ii) users of our Site, (iii) anyone who sends us an inquiry, registers for one of our events, or subscribes to our newsletters, (iv) partners' representatives and donors when supporting our work, as well as (iv) job applicants. Personal Information generally is information that includes a personal identifier like your name, email address or physical address, phone number, IP address or device identifier, or any data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, back to a natural person, household, or device, subject to definitions and exceptions under applicable law.

We will only collect and process your personal information when we have a legal basis to do so (*see following section*). Personal Information includes information that you provide to us and that we collect automatically. This may include the following:

Personal Information we collect to provide our solutions:

- Contact information, including first name, last name, email address, physical address, work and personal telephone numbers, and other similar identifiers.
- Payment data needed to provide you with the solutions, including billing information.
- Professional or employment-related information, including title, company, and business phone number.
- Login credentials to access and use the platforms (i.e., email address and password).
- Other information as reasonably necessary for CXL to provide its solutions.

Personal Information we collect to process donations:

• Contact information, including first name, last name, email address, physical address, work and personal telephone numbers, and similar identifiers.

- Payment data needed to process your donation, including bank, credit card and billing information.
- Other information as reasonably necessary for CXL to process donations.

Personal Information we collect to respond to your inquiry, to inform you about our solutions and events, and to send you our newsletters:

- Contact information, including first name, last name, email address, physical address, work and personal telephone numbers, and similar identifiers.
- Professional or employment-related information, including job title, company name, and business phone number.
- Other information as reasonably necessary for CXL to respond to your inquiry, inform you about our services and events, or send you our newsletters.

Personal Information we collect when you use the Site:

- Our system may collect information about your browser or mobile device automatically when you enter or utilize the Site. We may use cookies and similar technologies to help understand and optimize usage and usability. Data we collect automatically includes IP address, access dates and times, language preference, and referring and exiting URLs.
- For more information on how to manage your cookie preferences, please see our Cookie Notice.

Personal Information we collect to evaluate and process your application for employment:

- Contact information, including first name, email address, physical address, work and personal telephone numbers.
- Professional or employment-related information, including job title, employment history, and educational background, as well as information collected from the recruitment, hiring, and termination processes.
- Education, work experience, certifications, training, and language abilities.
- Residency, citizenship, or work authorization status.
- Other information linked to the Personal Information above as reasonably necessary for CXL's recruitment and hiring process.

How We Use Your Personal Information

To provide our solutions to clients

CXL processes Personal Information to perform a contract with you or to take precontractual steps at your request in order to:

- provide clients with our solutions and manage access to and use of our platforms;
- manage our relationship with you and carry out any related administration; and
- send you communications related to our solutions.

In addition, CXL processes Personal Information based on its legitimate interests, which consist of:

- maintaining and enhancing our solutions' security, as well as your safety when you use our solutions:
- complying with non-European Economic Area or non-UK laws, as relevant; and
- establish, exercise or defend legal claims, including respond to requests from, and other communications with, competent public, governmental, judicial or other regulatory authorities,

respond to valid legal process, investigate or participate in civil discovery, litigation, or other legal proceedings, or protect or defend your rights, property or security or ours.

To process donations

CXL processes Personal Information for the performance of the contract or to take precontractual steps at your request with you in order to:

- process donations we receive; and
- manage our relationship with you and carry out any related administration.

To respond to your inquiry, to inform you about our services and events, and to send you our newsletters

CXL processes Personal Information based on its legitimate interests, which consist of responding to your inquiries, including those sent to the contact details provided on the contact page of the Site and, where consent is not required, sending you marketing communications regarding our solutions and events.

In addition, if you have consented, including through the subscription form on the Site, you may receive our newsletters. You may opt out of receiving such communications at any time by clicking on the optout link included in the marketing communications or sending a request using the contact details specified at the end of this Privacy Policy.

To provide and improve our Sites

CXL processes Personal Information for the performance of the contract with you in order to provide you with our Site.

We process Personal Information to store cookies on your device(s) upon your consent where required, as described in our Cookie Notice.

To evaluate and process your application for employment with our organization

CXL processes Personal Information in order to take precontractual steps at your request for processing your application for employment at CXL, including to evaluate your candidacy.

To comply with applicable legal obligations

CXL also processes Personal Information in order to comply with applicable legal obligations to which it is subject.

Disclosure of Personal Information

For the purposes referred to under this Privacy Policy, we may need to share certain Personal Information with certain recipients. Such recipients will either act as another independent controller or as a processor acting on our behalf and upon our instructions.

We do not sell, or share for cross-context behavioral or targeted advertising purposes, as defined by certain laws, your Personal Information to any third party. We may disclose your Personal Information in the following limited circumstances:

• Authorized Third Parties and Service Providers: We may disclose your Personal Information to processors that provide us with the services necessary for the achievement of the purposes

described above, i.e. our third-party services providers that provide various types of services, including IT services and companies that provide web analytics, email distribution, recruitment tool, donation platform and other services. These third parties are only permitted to use your Personal Information to the extent necessary to enable them to provide their services to us. They are required to follow our instructions and to comply with appropriate security measures to protect your Personal Information.

- Other Parties When Required by Law or as Necessary: We may disclose your Personal Information to other entities acting as independent controllers, which may be legal or government authorities or third parties in connection with claims, disputes, litigation or investigations where we reasonably believe that disclosure is required by law or pursuant to legal process, or is necessary to establish, exercise or defend legal claims, including to protect or defend your rights, property or security or ours.
- *Other Parties With Your Consent:* There may be instances where we disclose your Personal Information to other authorized third parties when you expressly consent to such sharing.

International transfers

As we are based in the United States, your Personal Information may be transferred to the United States for the purposes referred to under this Privacy Policy.

Besides, when we share your Personal Information with the entities mentioned above, it may imply transfers of your Personal Information overseas, which may include transfers to countries outside of the European Economic Area ("EEA") or the United Kingdom ("UK") whose laws provide levels of protection for Personal Information that are not always equivalent to the level of protection that may be provided in your own country.

CXL has procedures in place to ensure that Personal Information is transferred, processed, and stored with appropriate safeguards and in accordance with applicable laws. Such appropriate safeguards may include standard contractual clauses issued by the European Commission (as amended by the UK Addendum issued by the UK Information Commissioner, where relevant) and we will provide you with details on the applicable safeguards and transfers upon request, to the contact details specified at the end of this Privacy Policy.

Security Procedures

CXL maintains appropriate technical and organizational security procedures in order to protect your Personal Information from loss, misuse, unauthorized access, disclosure or alteration, in accordance with applicable data protection and privacy laws.

Retention of Personal Information

General principles

CXL will retain your Personal Information for no longer than is necessary for the purposes identified under this Privacy Policy, and as permitted by applicable law.

Please note that the data retention period actually applied by CXL may vary, depending on the relevant purpose as described hereinafter.

In any event, CXL may keep your Personal Information for a longer time as those described below as part of its legal obligations. In such case, we will keep your Personal Information for the duration of such legal obligations.

On the expiration of the applicable data retention periods, CXL will delete or anonymize the relevant Personal Information.

For the provision of CXL solutions

With respect to the solutions provided to you, we will keep your Personal Information during the period of our contractual relationship, extended by the applicable statute limitation period.

For the processing of donations

CXL will keep your Personal Information during the period of our contractual relationship, extended by the applicable statute limitation period.

For responding to your inquiries, informing you about our services and events and sending you our newsletters

CXL will keep your Personal Information for communication purposes until you withdraw your consent or, if you are in the EEA or the UK, for three (3) years after the last contact with you.

For your recruitment and employment

For the applicants who are hired, CXL will keep your Personal Information during the period of your employment, extended by the applicable statute limitation period, or other applicable law.

If you are in the EEA or the UK, if you do not receive an employment offer, CXL will ask you if you want us to keep your information in order to give you the opportunity to apply for future positions.

Your Rights under the GDPR/UK GDPR

If you are in the EEA or the UK, you have various rights in relation to the processing of your Personal Information, depending on the relevant situation. These include the following rights:

- *Right of access:* right to request confirmation as to whether or not your Personal Information is being processed by CXL and, if so, the right to receive a copy of it;
- *Right to rectification*: right to request the rectification of your Personal Information if you find that it is inaccurate and the right to have incomplete personal information completed;
- **Right to erasure:** right to request the erasure or deletion of your Personal Information depending on the circumstances. For example, this right does not apply if the processing is necessary to establish, exercise, or defend legal claims;
- *Right to restriction:* right to request the restriction of processing of your Personal Information;
- **Right to data portability:** for processing carried out by automated means, right to request a copy of your Personal Information provided to us, in a structured, commonly used, and machine-readable format;
- **Right to object:** right to object, on grounds relating to your particular situation, to the processing of your Personal Information. For example, you can object at any time to the processing of your Personal Information for marketing communications.

In order to exercise any of your rights, or if you have any other questions about our use of your Personal Information, including if you wish to obtain further details regarding our legitimate interests, please

send a request using the contact details specified at the end of this Privacy Policy. Please note that we may ask you to provide us with additional information in order to verify your identity.

In any case, you also have the right to lodge a complaint with the competent data protection authority, in particular in the country of your habitual residence, place of work, or place of an alleged infringement if you consider that the processing of your Personal Information carried out by us infringes any applicable privacy laws.

Your Rights in other regions

Although we process Personal Information in the same manner across our regions, our global mission means that we are subject to a variety of data protection laws across the world.

In certain circumstances, subject to certain exceptions and applicable law, you may have various rights which allow you to exercise control over your Personal Information and how we handle it. For example, if we process your Personal information in Hong Kong, Singapore, or China, the applicable data protection laws give you rights to request access to, and to request correction of, your Personal Information, and to withdraw your consent.

To exercise any such rights, or if you have any other questions about our processing of your Personal Information, please send a request using the contact details specified at the end of this Privacy Notice. Please note that we may ask you to provide us with additional information to verify your identity and we may be entitled to charge a reasonable fee for responding to a data access request.

Use of Cookies

CXL uses "cookies" (small data files) on the Site. For detailed information about "cookies" and how they are used on the Site, please refer to the Cookie Notice.

Third Party Links

The Site may contain hyperlinks to websites of third parties. This Privacy Policy does not apply to such third party content or websites. If users decide to follow such links, they must be aware that CXL does not take any responsibility for the third party content or compliance of the third party website with data privacy laws. Users are encouraged to make themselves aware of applicable privacy policies before they submit personal information to third party websites.

Children's Privacy

CXL does not knowingly collect, use, or disclose personal information from individuals under eighteen (18) years of age. If CXL is made aware that it has collected such personal information in a manner that is inconsistent with applicable laws, CXL will delete this information. **Revisions to this Privacy Policy**

CXL reserves the right to change this Privacy Policy at any time. The applicable version of this Privacy Policy is available on the Site. In case there is a substantial change, we will notify you in this respect. If such change to the Privacy Policy requires your consent, you will have a choice to consent as to whether or not CXL may use your personal information in this different manner.

Contact

For any question, comment or query regarding the collection, processing and storage of your Personal Information by CXL, please contact us: via e-mail at wildme.community@conservationxlabs.org

or in writing to:

Conservation X Labs 1066 31st St NW Washington, DC 20007