

# Capitular Learning Center



## PRIVACY POLICY

The Capitular Learning Center (CLC) respects the privacy of every person whether as a private member or public use customer (jointly User) and is committed to protecting personal information. This Privacy Policy applies to information collected at [www.ggcramiclc.org](http://www.ggcramiclc.org) and/or by mobile apps (jointly Site). By accessing and continuing to use the Site, a User thereby acknowledges and agrees to the practices described in herein.

### A. Collected Information

Visitors can generally browse [ggcrami.org](http://ggcrami.org) anonymously without providing any personal information. However, there are instances when CLC may request information from persons visiting the website. Personally identifiable information is not collected without prior knowledge and consent. CLC will not collect any personally identifiable information unless the Site visitor voluntarily provides it. If a Site visitor should refrain from providing requested personal information, access to certain options, offers, and services may be restricted and unavailable.

#### 1. Personal Identification Information

Personal Identification Information is individual-specific data information such as name, phone number, email address, street mailing address, credit card number (if used to make purchase), or organizational affiliation. CLC and its service providers only collect Personal Identification Information when voluntarily submitted in exchange for personalized services.

- Personal Identification Information provided to CLC may be collected via the telephone, email, face-to-face conversation, or through online and offline forms such as CLC training courses, newsletters, surveys, event registration, contests, and other Masonic action alerts that you populate.
- CLC may use third-party postal address, telephone number, and email address services to provide accurate and updated information.
- Interaction with CLC through social media may result in collection of basic information including name and profile bio, social following, sharing activity and content preferences from the social media platforms.

- CLC may also collect information from or about the User from other online and offline sources, such as the General Grand Chapter of Royal Arch Masons, International, jurisdictional Grand Masonic Bodies, or information published by the User in other related online or print media, in addition to personal use of the Site or other direct communication.

## *2. Devices and Log Files*

When a User visits a CLC Site, some information is automatically collected from devices including computer IP (Internet Protocol) address, type of browser, inbound domain names and pages viewed. These log files are utilized to administer the CLC website, track visitor movement, and analyze broad trends to help determine the type of information visitors are interested in seeing on the website. No visitor personal information is identifiable within CLC log files. CLC uses this data for internal purposes only and does not share this information with external companies or institutions.

## *3. Cookies*

CLC may also collect information about User activity on the Site using certain technologies, such as a “cookie”. A “Cookie” is a set of informational data that is sent from the CLC web server to a User’s browser and stored on a personal hard drive. CLC uses a Cookie when a User orders a product or registers for a specific program. The Cookie stores information that allows the CLC website to remember the User the next time the Site is visited. Cookies are also used to tailor the CLC website to better match visitor interests and preferences. A user may choose to disable Cookies by changing personal browser settings. However, this action may require the User to resubmit the same Personal Identification Information each time the Site is visited or result in limited access to some of the information or features on the website.

## *4. Use of Information*

The Capitular Learning Center is dedicated to building a long-term relationship with its website Users. CLC will not sell, share or rent collected information to others in ways other than as set forth in this Privacy Policy. However, this Privacy Policy does not apply to the use or disclosure of information that is collected or obtained by other through means other than a CLC Site.

CLC will only collect and process Personal Identification Information about a User where we have lawful basis to do so. Lawful basis includes User consent; CLC legitimate interest in operating, managing and promoting the Capitular Learning Center; maintaining User relationships; and protecting the acceptable use, privacy, and security of the Capitular Learning Center and its Sites provided, that such processing shall not outweigh other legal rights and freedoms. Where CLC may rely on User consent to process personal data, the User has the right to withdraw or decline consent at any time, and where we rely on legitimate interests, a User has the right to object. If you have any questions about the lawful basis upon which CLC may collect and use personal data, please contact [info@ggcrami.org](mailto:info@ggcrami.org)

Examples of uses of Personal Identification Information where *User consent* exists include:

- Periodic alerts of CLC news, training programs, special events or other important updates if voluntarily registered to receive same; and
- Payment processing for products and services received as directly requested.

Examples of use and sharing of Personal identification Information for *legitimate interests* include:

- CLC response to visitor inquiries;
- Customization of web experience or content via email;
- Referral to related content on social media platforms;
- Internal data analysis to identify trends, determine effectiveness, enhance online tools, and plan future website development strategies;
- Response to a subpoena, court order, or other legal requirement or obligation by law;
- Response to a legal request by a law enforcement agency;
- Safeguarding the security or confidentiality of CLC records;

## **B. Shared Information**

To operate and manage the website, comply with the law, and safeguard User access, it may be necessary for CLC to share User Personal Identification Information with third parties.

### *1. Statistical and Aggregated Information*

CLC may share statistical or aggregated non-personal information about User interactions with Masonic partners, event sponsors, business consultants, and other third parties. No personal information is provided by CLC in these instances. This data is used to customize website content, promote additional learning opportunities, and deliver a better online experience for Users.

### *2. Business Service Providers*

CLC may partner with other parties to provide specialized services, such as shopping cart, billing solutions, and shipping which are designed to enhance the functionality of available products and services. Only the minimum necessary Personal Identification Information is provided to third parties to help produce and/or deliver User requested products and services. Third-party agents that

receive access to Personal Identification Information from CLC are prohibited from disclosing same to others, except as may be required by law.

### *3. Law Enforcement or Regulatory Government*

CLC will only disclose Personal Identification Information that is reasonably necessary to comply with a law, regulation or legal request; to protect the safety, rights, or property of the public, any person, or CLC; or to detect, prevent, or otherwise address fraud, security or technical issues.

### *4. Acquisition and Affiliation*

Should the Capitular Learning Center engage in a legal affiliation, merger, acquisition, or similar transaction or proceeding that involves the transfer of the information described in this Privacy Policy, CLC the transfer of User Personal Identification Information would occur with a party involved in such process (for example, the acquisition of CRC by the General Grand Chapter).

### *5. Linked Websites*

The Capitular Learning Center website may contain links to other websites. CLC is not responsible for the contents or privacy practices of any other website to which is it linked, or may otherwise refer. Visitors and customers to read the privacy policy of each website they visit. This Privacy Policy applies solely to information collected on the website operated by CLC.

### *6. Special Cases*

The Capitular Learning Center reserves the right to disclose personal information in special cases, when there is reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) CLC rights or property, other website users, or other that may be harmed by such activities.

## **C. Retained Information**

CLC will keep Personal Identification Information only so long as necessary to fulfill the purpose(s) described in this Privacy Policy. When personal information is no longer required to satisfy a CLC obligation to the User, and it has been determined CLC has fully complied with all legal or regulatory requirements, Personal Identification Information will either be purged from CLC systems or sanitized that it cannot identify any particular individual.

### *1. Changing Preferences*

If a User should need to update or change Personal Identification Information, CLC will help to correct or update personal data by contacting CLC directly or through its website. Website Users that no longer choose to receive electronic

communications from CLC, may remove their name from the subscription list by selecting the "unsubscribe" link on the website, or email CLC directly to decline future correspondence.

## *2. Removing Information*

Users that choose to remove their Personal Identification Information with CLC should email the exact name and all contact details to ensure complete and correct removal from the website.

## **D. Financial Data Security**

CLC well understands the necessity to protect account data in a verified, secure, and consistent fashion to maintain the highest level of confidence and convenience. Accordingly, CLC does not collect, process, store or otherwise have access to personal banking, credit, debit or other financial information. Any online purchase transaction is conducted through a qualified third-party processor with the highest level validation security level.

## **E. Children's Privacy**

The Capitular Learning Center recognizes the importance of protecting the privacy of children on the web and does not knowingly solicit, collect or use any personal information from visitors under 13 years of age. If it is discovered that a person under the age of 13 has provided CLC with any Personal Identification Information, such information will be immediately deleted from CLC system files. CLC does not reply to information requests from children under the age of 13, if so identified. CLC further encourages parents to supervise children when they browse the internet, and a parent or guardian must initiate any requests for information for children under the age of 13 on their behalf.

## **F. Domestic and International Notice**

### *1. California Residents*

It is the policy of CLC not to disclose any collected Personal Identification Information to third parties for direct marketing purposes under any circumstances. Additionally, in accordance with California Civil Code Section 1798.83, all residents of California are hereby afforded the option to exercise their choice of whether Personal Identification Information may be shared with third parties for direct marketing purposes or not, as well as, to receive information specified in the statute if Personal Identification Information is disclosed to third parties for direct marketing purposes. Accordingly, California residents are requested to inform CLC of their choice to permit or refuse the sharing of personal information with third parties for direct marketing purposes; or alternatively request certain information in the event personal information is disclosed to third parties for direct marketing purposes by contacting CLC at [info@ggcrami.org](mailto:info@ggcrami.org).

## *2. EU and UK Residents*

In accordance with applicable law, residents of the European Union and United Kingdom are entitled to know what Personal Identification Information CLC individually maintains, and may further request CLC to make any necessary corrections to ensure the information is accurate and up to date. Under applicable law, EU and UK residents also have the right to request deletion of, or to object to, the processing of Personal Identification Information. Residents further have a right to complain to their data protection authority. Please be aware that CLC is based in the United States, and that any information submitted to CLC will be stored on servers in the United States. Any EU or UK resident that would choose to exercise such rights are requested to contact CLC at [info@ggcrami.org](mailto:info@ggcrami.org).

## *3. Australia Residents*

Any resident of Australia that has any questions, comments, or complaints about the manner in which CLC collects, uses, or discloses of Personal Identification Information, or if a resident may believe that CLC has not maintained compliance with this Privacy Policy or the Australian Privacy Principles under the Privacy Act 1988 (Cth), please contact CLC at [info@ggcrami.org](mailto:info@ggcrami.org). Please provide as much detail as relevant in relation to the question, comment, or complaint. CLC takes any privacy complaint seriously and is immediately assessed with the aim of resolving any issue in a timely and efficient manner. If a resident is not satisfied with the outcome of the CLC assessment our complaint resolution, contact the Office of the Australian Information Commissioner for more information and direction.

## *4. Mexico Residents*

Residents of Mexico may contact CLC at [info@ggcrami.org](mailto:info@ggcrami.org) to enforce individual privacy rights at any time, including to access individual-specific data, request an update, amendment or deletion of Personal Identification Information; as well as oppose the way CLC may use personal data. Residents of Mexico may also contact CLC to request a revocation of previously granted consent(s) to the extent permitted by law. Through the same contact process, CLC may inform a resident request about:

- a. the information that must be provided to establish identity, as well as the documents necessary to be enclosed with the request;
- b. appropriate timeframes to receive a response regarding the request;
- c. forms available for submitting a request, including template forms that may be applied, if available, and the channel through which a CLC response will be delivered; and
- d. how CLC will deliver the information to the resident, normally in the form of copied documents or data messages.

## **G. Policy Modifications**

The Capitular Learning Center reserves the right to modify or supplement this Privacy Policy at any time. If a material change to this Privacy Policy is made, CLC will post a notice on the home page, and any changes posted on this page.

***Effective Date: This privacy policy is adopted November 22, 2020.***