

# Privacy Policy & Website Terms of Use – CBA

Last updated 21 December 2019



The Christian Business Angels is committed to protecting your privacy. You can visit most pages on our site ([www.ChristianBusinessAngels.org](http://www.ChristianBusinessAngels.org)) without giving us any information about yourself. But sometimes we do need information to provide services that you request. This document is designed to give a clear explanation of CBA's data processing practices. Please see below for further information.

If you have any questions or concerns relating to CBA's site or would like to find out more about how we collect, store or use your personal data, please contact us at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org).

If you have any other questions or comments, please refer to the operator of the Website: Stichting Christian Business Angels (hereinafter referred to as "Data Controller") Vierde Tochtweg 4a, Moordrecht, 2841LS, The Netherlands, or via email at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org)

## About Us

CBA has as its mission to provide support and/or assistance for Christian & other entrepreneurs in developing country locations for launch and/or growth of their businesses by providing early-stage investment funding and business consulting, with the ultimate aim of helping those entrepreneurs and their companies reduce poverty and increase local employment within their country (collectively, and among others, our "Services"). For additional information on our services please visit [www.ChristianBusinessAngels.org](http://www.ChristianBusinessAngels.org).

## The Information We Collect & the Primary Purpose for Collection

We are committed to safeguarding your privacy and ensuring that you continue to trust CBA with your personal data. When you interact with us, you may have to share personal information with us that allows identification of you as an individual (e.g. name, email address, address, and telephone number). This is known as "personal data". The personal information you provide is being collected for legitimate business purposes, which includes processing registrations or enquiries, keeping you informed about our services, about our company, upcoming events, new products or offers and providing the best possible service to you.

We respect the privacy of the users of our website ("you", "your") and are committed to protecting their personal data and information according to the applicable law.

The provision of this information is voluntary. However, if you do not provide the information requested, we may be unable to process your enquiry. All information provided by you will be held in the strictest confidence.

This privacy policy ("Policy") explains how, to what extent and for what purposes we are collecting and subsequently processing personal data and information.

CBA is responsible for the processing of your personal data and information. This Policy applies where CBA is acting as a data controller with respect to the personal data of you as a visitor to our websites and as a user of CBA platforms and/or services, in other words, where CBA determines the purposes and means of the processing of your personal data.

All information provided by you will be held in the strictest confidence.

## Scope and acceptance of this Privacy Policy

CBA has developed this Policy to describe how and what type of personal data will be collected from users of the CBA website and the purposes, for which CBA may collect, share or disclose the personal data.

By using the CBA website or by giving us your personal data in any other way ("CBA Sites"), you accept the collecting and processing of your personal data as described in this Policy. If you do not agree to this Policy, please do not use CBA Sites or give us any personal data.

This Policy applies to any information obtained by CBA through your use of the CBA Sites. It is not applicable to any websites controlled by third parties not affiliated with CBA that CBA Site may link to ("Third Party Sites"). Please review the privacy statements of each of these Third Party Sites as CBA is not responsible for and has no influence on the content or the privacy practices of Third Party Sites.

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CBA reserves the right to make changes to this Policy at any time. We encourage you to regularly review this Policy to make sure you are aware of any changes and how your personal data may be used.

## Definitions

In addition to terms defined elsewhere in this Policy, the following terms shall have the following meaning throughout this Policy: “Personal Information” means any information that either (a) personally identifies a natural person; or (b) pertains to an identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity, or (c) constitutes individually identifiable information about an individual consumer collected by us online through our website and that we maintain in an accessible form, or that (d) we are otherwise required to protect under applicable data privacy laws (including, but not limited to, national, international and supranational data protection and privacy laws, directives, regulations and comparable legal acts). Examples of Personal Information include your contact details such as your name, email address, birthday or phone number as well as information about your professional education and experience, skills, preferences, membership in professional organisations, etc.;

“Processing” (and variations such as “Process”) means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, restriction, erasure or destruction;

“Sensitive Personal Information” means Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation;

## Processing your Personal Information

Depending on your interaction with CBA, your Personal Information is Processed as follows:

### (i) Your Participation – Declaration of consent

As part of our Services, we provide training and workshops in cooperation with local churches and/or other organizations (our “Partners”). Your registration Information provided for such activities or other CBA related activities will mainly be processed by CBA.

Your Information processed by CBA and/or our Partners might contain (a) your contact details (name, address, phone number, email address, etc.), (b) your biographical data, and (c) any other Information you might choose to disclose to us.

When you visit the CBA Site, our web server may automatically record details about your visit: for example, your IP address, the website from which you visit us, the type of browser software used on CBA Site pages that you actually visit including the date and the duration of your visit. Please see our Cookie Notice as appropriate in relation to your use of our website for information on these technologies and your rights in relation to them.

CBA may use the personal data that you provide to us with your consent for a specified purpose or when you interact with CBA Sites or we process your data if we have a legal basis, namely, with regards to your registration to CBA events or your request of CBA services.

We do not rent or sell our customer e-mail lists but CBA may share your personal data with third parties for other purposes, but only in the following circumstances:

### I. With your consent

We will only share personal data with third parties outside of the CBA network when we have your consent to do so.

### II. For legitimate interests

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We will share personal data based on legitimate interests as, for example, when you register for one of our events, except where such interests are overridden by your interests or fundamental rights, in which case we will request your explicit consent.

## III. For external processing (service providers)

We may engage service providers, agents or contractors to provide services on our behalf, including to administer CBA Sites and services available to you. These third parties may come to access or otherwise process your personal data in the course of providing these services.

We may disclose your Personal Information:

- to our third party service providers who provide services such as website hosting, maintenance, data analysis, payment processing, order fulfilment, infrastructure provision, IT services, customer service, email delivery services, credit card processing, auditing services and other similar services, but only to the extent necessary or useful to provide such services, and only pursuant to contractual obligations requiring such third parties to maintain the privacy and security of your Personal Information.
- to identify you to anyone to whom you send messages through an Application
- as we believe to be necessary or appropriate:
  - under applicable law, including laws outside your country of residence;
  - to comply with legal process;
  - to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
  - to enforce our terms and conditions;
  - to protect our operations or those of any of our affiliates;
  - to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others;
  - to allow us to pursue available remedies or limit the damages that we may sustain; and
  - if we reasonably believe that an emergency involving an immediate danger of death or serious physical injury to any person requires immediate disclosure of communications or your Personal Information exists.
- To respond to information requests, information you submit (including any personal information) may be shared with CBA's partners/associates and transferred and/or stored across borders.

## IV. Compliance with laws

We will share personal data with third parties outside of CBA if we have a good-faith belief that access, use, preservation or disclosure of the personal data is reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request
- Enforce applicable Terms of Use, including investigation of potential violations
- Detect, prevent or otherwise address fraud, security or technical issues
- Protect against harm to the rights, property or safety of CBA, our users or the public as required or permitted by law

The public websites use third-party cookies for analytics (i.e. Google Analytics) and to track common metrics such as platform engagement, concurrent users, a maximum number of users, time spent on a page, etc. Any use of such analytics cookies is to improve your user experience and provide CBA with valuable information to help CBA to better tailor our services to our partners, members, constituents and participants.

In this context, most of the third-party service providers operating the database servers and some of our clients we might disclose excerpts of your Candidate Information to are located in countries outside of the European Economic Area (EEA) that have not been found by the European Union to provide an adequate level of protection of personal data, i.e. a level of protection of fundamental rights and freedoms that is essentially equivalent to that guaranteed within the European Union. Similarly, the countries your Candidate Information, or parts thereof, might be transferred to in accordance with the above may not be found to provide an adequate level of protection by jurisdictions outside of the European Union. By declaring your consent as set forth below you therefore explicitly and unambiguously (a) agree that your Candidate Information, or parts thereof, may be disclosed or otherwise transferred, as described above, to recipients in countries that may provide different, less or even inadequate

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protection of personal data as compared to the standards applicable in the jurisdiction you reside or work in or you contact us from, and (b) waive protection according to such standards with respect to the information so disclosed or transferred.

At no point will your Candidate Information be matched, linked or otherwise connected with Personal Information collected through other components of the Site for purposes other than providing Client Services. Your Candidate Data will be Processed until you revoke your declaration of consent given when sharing Candidate Data with us. Upon the revocation of your declaration of consent, we will delete your Candidate Data from all databases.

By sharing your Candidate Information with us, you explicitly consent to the Processing of your Candidate Information, including any Sensitive Personal Information you might choose to disclose to us, as described above. This includes, without limitation, the transfer of your Candidate Information, or parts thereof, to countries not providing an adequate level of protection of personal data. You acknowledge that you are under no obligation to provide your consent and that, if you choose to do so nonetheless, you may revoke your declaration of consent at any time with future effect by emailing us at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org).

### (ii) Cookies

Our Site may make use of cookies. Cookies are small text files downloaded by your Internet browser and stored on the device you use to access the Site (e.g., your desktop computer, tablet or smartphone). Depending on their purpose, cookies log specific user-related information such as your user preferences, authentication information, security parameters, data concerning the device you access the Site with and statistical information regarding your use of the Site. Where necessary during your visit of the Site or when revisiting the Site, your Internet browser transmits the cookies including the contained information back to the servers they were initially downloaded from. The analysis and Processing of such information allows us to ensure the functionality of the Site, improve your online experience and optimise the structure and content of the Site.

The cookies we use can be categorised as follows:

- **Session Cookies** : These are cookies that allow our Site to collect information about what you do during a browsing session each time you visit the Site. When connecting to our server, your device will be allocated a session ID, which enables our server to identify your device during the session and facilitates Site usability. These cookies are temporary and are set to be deleted when you leave the Site;
- **Persistent Cookies** : These are cookies that are stored by your Internet browser for more than a session and are set to expire within a defined time period. Persistent cookies enable us to remember your settings and information, so you do not have to keep re-entering them whenever you visit our Site. They also measure how you use and interact with the Site and enable us to personalise the Site. For example, they may allow us to alter the rotation of images on the Site so that different images will be displayed on your next visit;
- **First-Party Cookies** : These are cookies that we store and access on your device in our capacity as controller of your Personal Information when you visit our Site. They might include cookies related to third-party service providers, provided that we control and determine the purposes and means of the Processing of your Personal Information logged by such cookies. As a result, first-party cookies might log user-related Personal Information accessible to and Processed by third parties on our behalf and subject to our instructions.
- **Third-Party Cookies** : These are cookies that are stored and accessed on your device by third parties determining the purposes and means of the Processing of your Personal Information logged by such cookies.

You may influence the scope and extent to which we use cookies when you visit our Site. In particular, you may prevent cookies from being stored on your device by adjusting the respective settings on your Internet browser. For more information on how to do so in the settings of your particular Internet browser, please see the following information:

Internet Explorer: <https://privacy.microsoft.com/en-us/internet-explorer-ie11-preview-privacy-statement>

Chrome: <https://www.google.com/intl/en/chrome/browser/privacy/>

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Firefox: <https://support.mozilla.org/en-US/products/firefox/protect-your-privacy>

Safari: <http://www.apple.com/privacy/manage-your-privacy/>

However, please be aware that this might render certain functions of our Site inoperable or more difficult to use. Depending on the Internet browser you use, you might also be able to specifically reject third-party cookies. In this context, please note, however, that third parties might still have access to your Personal Information to the extent that such information is logged by first-party cookies.

For additional information on first-party and third-party cookies used on our Site in the context of third-party services and for information on how you might stop such cookies from being stored on your device, please see “Third-Party Services” below.

## (iii) Third-Party Services

On our Site, we use the following services provided by third parties:

### Google Analytics

Our Site uses Google Analytics, a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help analyze how users use the Site.

The information generated by the cookies about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. The United States has not been found by the European Union to provide an adequate level of protection of personal data, i.e. a level of protection of fundamental rights and freedoms that is essentially equivalent to that guaranteed within the European Union. Similarly, the United States may not be found to provide an adequate level of protection by jurisdictions outside of the European Union.

On our behalf, Google will use the information collected for the purpose of evaluating your use of the Site, compiling reports on website activity for us and providing other services relating to website activity and Internet usage to us. Google will not associate your IP address with any other data held by Google. Neither will we match, link or otherwise connect any information received from Google with Personal Information collected through other components of the Site.

You may refuse the use of cookies by selecting the appropriate settings on your Internet browser. However, please note that if you do this, you may not be able to use the full functionality of our Site. Furthermore you can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

Lastly, you can refuse the use of Google Analytics by clicking on the following link: [Disable Google Analytics](#)

In the latter case, an opt-out cookie will be set on your device, which prevents the future collection of your data when visiting this Site. Be aware, however that the opt-out cookie will only be effective within the Internet browser you used to access the above link and only for as long as you do not delete the opt-out cookie.

Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/terms/gb.html> or at [https://www.google.de/intl/en\\_uk/policies/](https://www.google.de/intl/en_uk/policies/).

## Data Security

Protecting your Personal Information is important to us and we take precautions to protect your information. We use appropriate technical and organisational measures and safeguards designed to help prevent unauthorised access, unlawful Processing, and unauthorised or accidental loss of your Personal Information. This includes, for example, the encryption of your communication with us over the Site based on the Secure Socket Layer (SSL) protocol. Access to all of our users’ information is restricted in our offices. Only employees who need the information to perform a specific job are granted access to personally identifiable information.

## Correcting, Updating or Removing Your Personal Information

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CBA will make every attempt to keep your personal data accurate, complete and up to date. If your personal information is incorrect, changes, or if you no longer wish to receive information from CBA, we will endeavor to correct, update or remove your information as swiftly as possible. This can be done by emailing us at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org) or you can update this via the link in the footer of the mailings.

### Direct Marketing

If you no longer wish to receive newsletters or promotional materials, you may opt-out of receiving these communications. You can do it by following the unsubscribe link placed in the footer of the promotional email or you can simply email us at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org) and ask to be unsubscribed.

Please note that if you opt out as described above, this will apply to marketing messages from us only. We will not be able to remove your Personal Information from the database of any other Users you have shared such information or from third parties to whom you have previously authorised us to share such information (i.e., to which we have already provided your Personal Information as of the date that we implement your opt-out request). Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

### Your Right to Information

Subject to the applicable law, you have the right to (a) obtain information about your Personal Information we Process, and to (b) request the correction, deletion or blocking of incorrect Personal Information or Personal Information not Processed in line with the applicable legal requirements. To make a respective request, please use the contact details provided in “How to Contact Us” below.

### Amendments to Policy

From time to time we may change our business activities and/or our policies and procedures with respect to the Processing of Personal Information. Where appropriate in these cases, we will, subject to applicable law, revise, supplement, or replace this Policy. When the Policy changes, we will post the substitute version and change the effective date listed at the beginning of the Policy. When required by applicable law, however, we may provide you with advance notice of any changes to this Policy and with an opportunity to object to such changes. If you exercise your right to object, the changes will not become effective with respect to your Personal Information, but your ability to use our Services may be terminated or impaired. We will explicitly notify you of the consequences of the objection or non-objection to the extent and in the manner required by law.

### How to Contact Us

We encourage your questions and comments about this Policy and our privacy practices. Please contact us simply email us at [info@ChristianBusinessAngels.org](mailto:info@ChristianBusinessAngels.org).