

Rotary's Privacy Policy

Introduction

Rotary International and The Rotary Foundation of Rotary International (individually or collectively, "Rotary") respect your privacy and are committed to protecting it through our compliance with this privacy policy ("Policy"). Maintaining protection of the data entrusted to our care by our constituents is of the utmost importance to Rotary.

This Policy describes the types of data we may collect from you or that you may provide when you visit our website Rotary.org (our "Website"), join our clubs, use our services, or participate in our programs. It also describes our policies and practices for collecting, using, protecting, and disclosing that data.

Please note that supplementary rules apply in relation to individuals whose data we collect if they are located in the European Union or European Economic Area. (Please see appendix A: EU Privacy Notice.)

This Policy applies to personal data we collect:

- On our Website
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy
- Through our Rotary clubs, districts, and partner organizations when you become a member
- When you sign up for and/or attend any events that we host
- When you interact with us in another way, for example, contacting us with an inquiry

This Policy may change from time to time (see Changes to Our Privacy Policy section), so please check the Policy periodically for the most current version. If you have any questions about the meaning or interpretation of this Policy, the English-language version of this Policy is the official text.

Data We Collect About You and How We Collect It

We collect several types of personal data, including:

- Data by which you may be personally identified, including your name, postal address, email address, or telephone number ("personal data") and/or
- Data about your internet connection, the equipment you use to access our Website, and usage details

We collect data from:

- Users of our Website
- Members of Rotary and Rotaract clubs

- Donors to The Rotary Foundation
- People who attend Rotary events
- People who participate in Rotary's programs

We collect this data:

- Directly from you when you provide it to us
- Automatically, as you navigate through the Website (data collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies)
- From third parties we contract with to provide services on our behalf, such as event organizers, travel service providers (used by the Rotary International Travel Service, or RITS), payment processing services, email marketing services, and software providers; these service providers may change, or new service providers may be added without notice to you
- From clubs, districts, including multidistrict organizations, and partners in our global network
- From publicly available resources

Data You Provide to Us

We collect data you provide when you interact with our Website or when dealing with Rotary or our network offline. That data includes:

- Personal data that you provide by making an inquiry of Rotary or joining as a member of a Rotary or Rotaract club; this includes data provided when registering to Rotary.org through My Rotary.
- Personal data you provide when participating in services available on our Website, including in:
 - The Brand Center
 - The Grant Center
 - The Learning Center
 - Rotary Club Central
 - Rotary Global Rewards
 - Rotary Ideas
 - Rotary Shop
 - Rotary Showcase
- Personal data you provide when posting material on our Website
- Personal data you provide when you enter a contest or promotion sponsored by us
- Personal data you provide when you report a problem with our Website
- Records and copies of your correspondence (including email, social media posts, and other electronic messages), if you contact us
- Your responses to surveys that we might ask you to complete for research purposes
- Your registration to attend and/or participate in Rotary events
- Personal data you provide when making a donation

- Personal data you provide when submitting applications, for example, for grants, fellowships, or scholarships
- Biographical or other data you provide to us, your Rotary club, or your Rotary district (for example, if you choose to put your name forth as a candidate for an office in a Rotary club, Rotary district, or RI)
- Details of transactions you carry out through our Website and details of the fulfillment of your orders (you may be required to provide financial personal data before placing an order through our Website)
- Your search queries on our Website

Features that are developed in the future may result in the collection of additional new personal data.

You also may provide data to be published or displayed (hereinafter, "posted") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "User Content"). Your User Content is posted on the Website and transmitted to others at your own risk. Although we limit access to certain pages and you may set certain privacy settings for such data by signing in to your account profile, no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Content.

Usage Details, IP Addresses, Cookies, and Other Technologies

As you navigate through and interact with our Website, we may automatically collect certain data about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website
- Information about your computer and internet connection, including your IP address, operating system, and browser type

When you are not signed in to a My Rotary account, the data collected in this way is anonymous. It is aggregated into statistical data to help us improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size, browser statistics, popularity of content, and usage patterns
- Speed up your searches
- Recognize you when you return to our Website

We use cookies (or browser cookies) for this automatic data collection. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

When you are signed in to a My Rotary account, we collect usage data that is tied to your individual account. This data is collected for the purposes of improving site functionality and tailoring site behavior and content to you, and we process such personal data in accordance with the remainder of this Policy.

Third-party Advertiser Use of Cookies and Other Tracking Technologies

Some advertisements on Rotary.org and the advertisements and offers on Rotary Global Rewards are served by third-party advertisers, ad networks, and ad servers. Additionally, some of the applications accessible from, or on, our Website may be owned by third parties. These third parties may use cookies alone or in conjunction with other tracking technologies to collect data about our users. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement on Rotary.org or an advertisement or offer on Rotary Global Rewards, you should contact the responsible advertiser directly. For information about how you can opt out of receiving targeted advertising from these providers, see the Choices About How We Use and Disclose Your Personal Data section.

How We Use Your Personal Data

We use data that we collect about you or that you provide to us, including any personal data:

- To present our Website and its contents to you
- To provide you with information, products, or services that you request from us
- To offer and fulfill our core business purposes, which include:
 - Fulfilling Rotary's obligation to Rotarians and other individuals
 - Financial processing
 - Supporting The Rotary Foundation, including fundraising efforts
 - Facilitating convention and special event planning
 - Communicating key organizational messages through Rotary publications and other materials
 - Supporting the programs and membership of Rotary
 - Complying with any legal obligations
- To fulfill any other purpose for which you provide it
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection
- To notify you about changes to our Website or any products or services we offer or provide through it
- To allow you to participate in interactive features on our Website
- To store information about your preferences, allowing us to customize our Website according to your individual interests
- In any other way we may describe when you provide the personal data
- For any other purpose where we have your consent

We may also use your data to contact you about our own

and third-parties' goods and services that may be of interest to you. Rotary confirms that it will not sell or trade its membership data without the prior approval of the Rotary International Board of Directors. If you do not want us to use your data in this way, you may opt out of these contacts by notifying us. For more information, see the Choices About How We Use and Disclose Your Personal Data section.

Disclosure of Your Personal Data

We may disclose aggregated data about our users, and data that cannot be used to identify any individual, without restriction.

We may disclose personal data that we collect or you provide as described in this Policy:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them
- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal data confidential and use it only for the purposes for which we disclose it to them. For more information, see the Choices About How We Use and Disclose Your Personal Data section.
- To fulfill the purpose for which you provide it
- For any other purpose disclosed by us when you provide the data
- With your consent

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Rotary, Rotarians, Rotary clubs, Rotary districts, or others. This includes exchanging personal data with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Personal Data

We strive to provide you with choices regarding the personal data you provide to us. We have created mechanisms to provide you with the following control over your data:

- *Tracking Technologies and Advertising.* You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. You also will not be able to use Rotary Global Rewards.
- *Disclosure of Your Personal Data for Third-Party Advertising.* If you do not want us to share your personal data with unaffiliated or non-agent third parties for promotional purposes, for some third-party advertisers you can opt out by signing in to our Website and adjusting your user preferences in your account profile by checking or unchecking

the relevant boxes. Otherwise you can send us an email stating your request to rotarysupportcenter@rotary.org.

- *Promotional Offers*. If you do not wish to have your contact information used by Rotary to promote our own or third parties' products or services, for some third parties' products or services, you can opt out by signing in to our Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes. Otherwise you can send an email stating your request to rotarysupportcenter@rotary.org. If we have sent you a promotional email, you may email us asking to be omitted from future email distributions.

Rotary Foundation Donor Privacy Personal Data

Rotary will not sell, trade, or share a Rotary Foundation donor's personal data, including their name, phone number, email, or physical address, with non-Rotary entities, nor will it send donors mailings on behalf of other unrelated organizations. This policy applies to all donor data received by Rotary, both online and offline, as well as any electronic, written, or oral communication. Rotary occasionally uses third-party vendors to manage and process donor data. These vendors are bound by strict confidentiality agreements.

Accessing and Correcting Your Personal Data

You may access and correct your data using the following methods:

- When you are a registered user on this Website, sign in to our Website and visit your account profile page on My Rotary.
- Email rotarysupportcenter@rotary.org to request access to, correct, or delete any personal data that you have provided to us.

We may choose not to accommodate a request to change or delete data if we believe the change or deletion would violate any law or legal requirement or cause the data to be incorrect.

If you delete your User Content from the Website, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of data provided on our Website, including User Content, is governed by our Terms of Use, although for EU/EEA-based individuals this does not prejudice your mandatory rights under EU Protection Law (see Appendix A: EU Privacy Notice).

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. We do not knowingly collect personal data from children under 16 without parental consent. No one under age 16 may provide any personal data to or on our Website. If you are under 16, do not use or provide any personal data on our Website or on or through any of its features, register on our Website, make any purchases through our Website, use any of the interactive or public comment features of our Website, or provide any personal data about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we

have collected or received personal data from a child under 16 without verification of parental consent, we will delete that personal data. If you believe we might have any personal data from or about a child under 16, please contact us at rotarysupportcenter@rotary.org.

Data Security

We have implemented technical and operational measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. When developing new or enhancing existing systems and processes, Rotary implements appropriate data protection throughout its data processing operations. All personal data you provide to us is stored on password-protected databases on our secure servers behind firewalls and we use Secure Sockets Layer (SSL) to ensure that the transmission of sensitive data for payments and contributions is encrypted and appropriately safeguarded. We train our employees on the importance of data security and focus specifically on practices for protecting against unauthorized disclosure of personal data. We have a documented incident response plan for promptly acting upon events that violate Rotary's security or privacy policies, should they occur, and this plan is reviewed and updated on an ongoing basis.

The safety and security of your personal data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. Passwords registered with our Website are encrypted to ensure protection against unauthorized access to your personal data. We ask you not to share your password with anyone. We urge you to be careful about giving out personal data in public areas of our Website. The personal data you share in public areas may be viewed by any user of our Website.

Unfortunately, the transmission of personal data via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website or over any public network. Any transmission of personal data is at your own risk. Without prejudice to any mandatory legal obligations to which we may be subject, we are not responsible for circumvention of any privacy settings or security measures contained on our Website.

Changes to Our Privacy Policy

Rotary may change, add, modify or remove portions of this Policy at any time, which shall become effective immediately upon posting on this page. The date the Policy was last revised is identified at the bottom of the policy. It is your responsibility to review this Policy for any changes. By continuing to use our Website, maintain your membership in our clubs, use our services, or participate in our programs, you agree to any changes in the Policy.

Contact Information

If you have any questions about Rotary's privacy protection practices, please contact us at privacy@rotary.org.

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Appendix A: EU Privacy Notice

If you are a resident of the European Union (EU) or European Economic Area (EEA) whose personal data we collect, the following additional information applies to you.

Introduction

If you are an EU or EEA resident and Rotary knowingly collects your personal data, we will do so in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ("GDPR") and EU member state national laws that implement or regulate the collection, processing and privacy of your personal data (together, "EU Data Protection Law").

This EU privacy notice ("EU Privacy Notice"), which should be read in conjunction Rotary's Privacy Policy, provides further information as required under EU Data Protection Law on how we handle or process the personal data we collect and who we may share it with.

This Privacy Notice also provides information on your legal rights under EU Data Protection Law and how you can exercise them.

How Personal Data is Collected

Because of the global nature of our organization and our clubs, Rotary may hold and process personal data that is collected from clubs, districts, and partner organizations around the world, including within the EU/EEA.

This also means that if you contact the Rotary network and are a resident in the EU/EEA, your personal data may be transferred from the EU/EEA to Rotary headquarters in the United States, and may also be accessed and processed from Rotary's international offices in Australia, Brazil, India, Japan, South Korea, and Switzerland.

U.S. data privacy laws are currently not considered to meet the same legal standards of protection for personal data as those set out under EU Data Protection Law. However, in order to safeguard personal data received from the EU/EEA, we allow such a transfer of personal data to the U.S. or other third countries only under an approved contract or another appropriate mechanism that is legally authorized under EU Data Protection Law.

This is to make sure that the personal data that Rotary receives and processes (so far as it relates to residents of the EU/EEA) is properly safeguarded in accordance with similar legal standards of privacy you would enjoy under EU Data Protection Law.

Direct Marketing

If Rotary provides direct marketing communications to individuals in the EU/EEA regarding services and/or events that may be of interest, this will be done in accordance with EU Data Protection Law, and in particular where we contact individuals for direct marketing purposes by SMS, email, fax, social media, and/or any other electronic communication channels, this will only be with the individual's consent or in relation to similar services to services that the individual has purchased (or made direct inquiries about purchasing) from Rotary before.

Individuals are also free to object or withdraw consent to receive direct marketing from us at any time, by contacting us at privacy@rotary.org.

Lawful Grounds on Which We Collect and Process Personal Data

We process your personal data for the above purposes, relying on one or more of the following lawful grounds under EU Data Protection Law:

- When you have freely provided your specific, informed, and unambiguous consent for Rotary to process your personal data for particular purposes
- Where we agree to provide services to you, in order to set up and perform our contractual obligations to you and/or enforce our rights
- Where we need to process and use your personal data in connection with our legitimate interests and need to be able to effectively manage and operate our global organization in a consistent manner across all territories. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right to privacy; and/or
- Where we need to comply with a legal obligation or for the purpose of our being able to establish, exercise, or defend legal claims

Please also note that some of the personal data we receive and that we process may include what is known as "sensitive" or "special category" personal data about you, for example, personal data regarding your ethnic origin or political, philosophical, and religious beliefs. This is not the type of data that Rotary or its clubs routinely collect, but if we process such sensitive or special category data, we will do it only in situations where:

- You have provided us with your explicit consent to use it
- We have a legal obligation to process such data in accordance with EU Data Protection Law
- It is needed to protect your vital interests (or those of someone else), such as in a medical emergency
- You have clearly chosen to publicize such information; or
- It is needed in connection with a legal claim that we have or may be subject to

Disclosing Your Personal Data to Third Parties

We may disclose your personal data to certain third-party organizations that are processing data solely in accordance with our instructions ("Data Processors"), such as companies and/or organizations that support our business and operations (for example, providers of web or database hosting, IT support, payment providers, event organizers, agencies we use to conduct fraud checks, or mail management service providers), as well as professionals we use such as lawyers, insurers, auditors, or accountants. We use only those Data Processors that can guarantee to us that adequate safeguards are put in place by them to protect the personal data they process on our behalf.

In certain circumstances, for example, if you travel on Rotary business, we may also disclose your personal data to third parties called "Data Controllers." Such third parties may include travel agencies, airlines, car rental agencies, and hotels. Due to the nature of the business of the Data Controllers, they will make their own determinations as to how they process your personal data. As Data Controllers, they are required to follow the EU Data Protection Law and are required to protect personal data with adequate safeguards and provide you with notice if their processing goes beyond the instructions Rotary provided. The types of external third-party Data Controllers listed above may handle your personal data in accordance with their own chosen procedures, and you should check the relevant privacy policies of these companies or organizations to understand how they may use your personal data.

Other than as described above, we will treat your personal data as private and will not routinely disclose it to third parties without your knowing about it. The exceptions are in relation to legal proceedings or where we are legally required to do so and cannot tell you (such as a criminal investigation). We always aim to ensure that your personal data is used only by third parties we deal with for lawful purposes and who observe the principles of EU Data Protection Law.

How Long We Retain Your Personal Data

Rotary retains personal data identifying you for as long as necessary in the circumstances — for instance, as long you are a member of a club or have a relationship with our network, for a reasonable period to send you marketing materials where we have regular contact with you, or as may be needed to enforce or defend contract claims or as is required by applicable law.

Rotary has adopted a Records Management Policy (which we may make available on request). The criteria we use for determining the relevant retention and disposal periods we adopt are based on the purpose for which we hold data and the reasonable expectations of those whose personal data we collect in these circumstances, taking into account various legislative requirements and guidance issued by relevant EU regulatory authorities.

In accordance with the above retention policy, the personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it.

Your Personal Data Rights

In accordance with your legal rights under EU Data Protection Law, you have a "subject access request" right, under which you can request information about the personal data that we hold about you, what we use that personal data for and who it may be disclosed to, as well as certain other information.

Usually we will have one month to respond to a subject access request. However, we reserve the right to verify your identity, and we may, in case of complex requests, require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests. We may also require further information to locate the specific data you seek, and certain legal exemptions under EU Data Protection Law may apply when we respond to your subject access request.

Under EU Data Protection Law, EU/EEA residents also have the following rights, which you may exercise by making a request to us in writing:

- That we correct personal data that we hold about you that is inaccurate or incomplete
- That we erase your personal data without undue delay if we no longer need to hold or process it
- To object to any automated processing (if applicable) that we carry out in relation to your personal data, for example, if we conduct any automated credit scoring
- To object to our use of your personal data for direct marketing
- To object to and/or to restrict the use of your personal data for a purpose other than those set out above unless we have a compelling legitimate reason; or
- That we transfer personal data to another party where the personal data has been collected with your consent or is being used to perform services under a contract with you and is being processed by automated means

So we can fully comply, please note that these requests may also be forwarded to third-party data processors that are involved in the processing of your personal data on our behalf.

If you would like to exercise any of the rights set out above, please contact us at privacy@rotary.org.

If you make a request and are not satisfied with our response, or you believe that we are illegally processing your personal data, you have the right to complain to the Office of the Information Commissioner in the United Kingdom.