



## Our Privacy Policy

Imagine (501.c.3 / NGO) is committed to protecting your privacy and ensuring a positive experience in our programs and on our website. Our Privacy Policy covers Imagine's website, [www.imaginemindfulness.com](http://www.imaginemindfulness.com), and our students worldwide.

The policy outlines how we collect and use the Personal Data provided during your online and offline interactions with us. As defined in this policy, "Personal Data" means any information that can be used to individually identify a person, and may include, but is not limited to, name, email address, town address, and other personally identifiable information that has been provided in our Intake Forms and Questionnaires.

If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland, you may have additional rights with respect to your Personal Data, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland.

Imagine (501.c.3 / NGO) will be the controller of your Personal Data that is provided, collected and/or processed pursuant to this Privacy Policy, except where otherwise expressly stated below. This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Privacy Policy when returning to our website.

### Collection of Personal Information

We receive, collect and store any information you enter in our Intake Form or provide us in any other way, such as via our Questionnaires. This data includes but is not limited to personally identifiable information such as name, email address, phone number, town/city, emergency contact information, age, and information about experienced symptoms. We also collect

answers to more general questions pertaining to how stress might impact your life, goals you would like to set for yourself, and your experience with the program.

We process your payments through PayPal, a direct payment gateway offered by Wix.com, the platform that hosts our website. Wix adheres to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers. You can find Wix' Privacy Policy [here](#). We do not capture or store credit card information.

## Use of Personal Information

Your personal information will be used to assist both you and the instructors in personalizing your program experience, in assessing MBSR's impact in your life, and in supporting you in the future. Additionally, we aggregate Questionnaire responses into *statistical data for analysis* to improve our program for future students and to show results of our program - the statistical data will not show any connection between you and your responses. We also keep class and alumni lists, which consist only of name, email address, age, and cohort information. This will be used to notify you about changes to our program and provide you with news, information about services, and events that are similar to those that you have already participated in or enquired about. You may opt out of these notifications.

## Storage, Retention, and Security of Personal Information

While you are in programs, the personal information you provide is stored on our Google Business Account Drive for the explicit purpose to assist our instructors in delivering the program. Google works hard to protect itself and its users from unauthorized access to or unauthorized alteration, disclosure, or destruction of information they hold. Data is stored on secure servers behind a firewall. You can find Google's Privacy Policy [here](#).

We use Wix to host our Intake Form. Wix is compliant with GDPR and does not share information with third parties. You can read their commitment [here](#).

At the end of each program, your personal data (except for your name, email address, phone number, location, and year of birth which is added to our alumni list) will be deleted from Google Drive. Class and alumni lists are never shared with anyone unless students or alumni expressly request it. Information that was collected via our Questionnaires is aggregated in non-personal statistical data and used to enhance and advance our program. This aggregated data will also be deleted from the Google Drive and stored on an external hard drive held by our officers. Furthermore, we delete the Intake Forms from Wix at the end of your attendance. Wix only keeps your name and phone number and keeps records of how you engaged with Imagine (501.c.3 / NGO).

## Processing of Personal Data

We will use your Personal Data only in accordance with our Privacy Policy and based on our Confidentiality and Commitment Agreement with you. If you do not wish us to continue using your Personal Data in this manner, you can request that your personal data will not be used in any way by contacting us personally or via the "Contact Us" section.

The Imagine Online website uses *basic* Visitor Analytics provided by Wix, the platform hosting our website, to gather general information about traffic to our website. Visitor Analytics provides Imagine Online with real time insights about visitors, including page visits, bounce rates, geographical location, and the presence of live visitors to the website at that moment. We only use the basic App - which does not gather personal information. Wix' Visitor Analytics App is compliant with GDPR and does not share information with third parties. You can read their commitment [here](#).

Because of our Google Business Account we are also able to access basic Analytics SOLELY to monitor traffic on our website. We do NOT have a direct customer contract with Google, which is why monitoring is limited to the below - no personal data is collected. Real-Time Data updates show the number of people on our site, their geographical locations, the keywords and sites that referred them, the pages they have visited, and conversions as they happen. You can find Google's commitment to GDPR [here](#).

## Referrals

If you choose to provide us with a referral, you represent that you have their consent to provide us your friend's name and email address. We will personally reach out to your friend and invite him or her to contact us. Unless we are authorized by your friend, we will only use your friend's name and email address for the purposes of making this one-time contact and maintaining an activity log of our referral activity.

## Newsletter

You can sign-up, and therefore consent, to receive email or newsletter communications from us. If you would like to discontinue receiving these communications, you can update your preferences by using the "Unsubscribe" link found in such emails or by contacting us using the information in the "Contact Us" section of this policy.

## Live Online Video Sessions

Imagine (501.c.3 / NGO) uses the Zoom platform for our live online sessions. Imagine (501.c.3 / NGO) itself does NOT record video sessions nor do we save chat sessions. Zoom Video Communications, Inc has its own privacy policy, which you can find [here](#). Information about Zoom's compliance with GDPR can be found via this [link](#).

## Passive Collection

Imagine Online's website via our hosting service Wix automatically collects some information about you when you use our product, using methods such as cookies and tracking technologies (further described below). Information automatically collected includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the website and/or Products.

In addition, when you use some of our Products, such as the meditations provided on the website, network information is transmitted back to us such as Product usage information. This information is transmitted back to us so we can determine how users are interacting with our Products, to assist us with improving our Products, and to correct any problems that may occur.

## Cookies and Tracking Technologies

Wix uses cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and gather information about our user base, such as location information based on IP addresses. Users can control the use of cookies at the individual browser level. For more information regarding cookies or similar technologies, please review Wix's [Cookie Policy](#).

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Wix does not support Do Not Track requests at this time.

## Sharing your Personal Data

We do not give, sell, or rent your Personal Data to third parties - ever!

## Linked websites and third party services

Our website and services may provide links to other third-party websites and services which are outside our control and not covered by this policy. We encourage you to review the privacy policies posted on these (and all) sites you visit or services you use.

## Legal Requirements

In extraordinary circumstances, Imagine (501.c.3 / NGO) may need to disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Imagine (501.c.3 / NGO)
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Data Protection Rights under GDPR

We've updated our terms and internal processes to take into account new standards imposed by the General Data Protection Regulation (GDPR), the European Union data protection law which went into effect on May 25, 2018. This regulation gives individuals in the EU more control over their personal data and regulates businesses that store personal data. Imagine (501.c.3 / NGO) aims to take reasonable steps to allow our students to correct, amend, delete, or limit the use of your Personal Data. Please note that we may ask you to verify your identity before responding to requests as outlined below.

As a resident of the European Economic Area (EEA), you have certain data protection rights. Please contact us personally or via the "Contact Us" form on the website if you wish to discuss how we collect, use, and store the Personal Information we hold about you and/or if you want it to be removed from our systems.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.

- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Imagine (501.c.3 / NGO) relied on your consent to process your personal information.
- The right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Wix, who hosts our website, is also GDPR compliant - see their Privacy Policy [here](#). They furthermore have created tools to assist us, their clients, to easily create copies of our customers' data and to delete customers' data.

By continuing to use our services on or after May 25, 2018, you acknowledge our updated Privacy Policy and Terms of Service. Please contact us personally or at [info@imaginemindfulness](mailto:info@imaginemindfulness) if you have any questions or concerns. We will attempt to resolve any complaints regarding the use of your Personal Information in accordance with this Privacy Policy.

Thank you for your attention, and thank you for being a valued member of our Imagine Community.