

1. Introduction

Welcome to CIRCLER.WORLD. This community platform offers you, a Circler, the opportunity to get connected with Ladies worldwide in the digital age. While browsing on this internet portal, data is naturally generated, regardless of whether it is used as a logged in member or without logging in. Your privacy and the security of your personal data are extremely important to us and will always be. Hence, we want to explain transparently how and why we collect, store, share and use your personally identifiable information - as well as provide an overview of the controls and settings that allow you to decide when and how we may pass which of your personal data.

This policy describes how we collect, hold, use and disclose personal information that a Circler provides or is collected by us on a Circler.

The objective of this privacy policy is:

- a) ensure that you understand what personal information we collect from you;
- b) explain to you the reasons why we collect and use the data and to whom we pass it on;
- c) explain to you how we use the personal data that you provided;
- d) show you your rights and possibilities with regard to the personal data that we collect and process from you;
- e) show you how we protect your privacy.

2. Details of the responsible person

Responsible as defined by Art. 4 No. 7 GDPR is:

Ladies' Circle International

3. Contact

For data protection concerns, you can directly contact the privacy officer of the platform:

Contact details for **Ladies' Circle International**:

Circler.World Manager

Info@circler.world

4. Data Use

When accessing this portal, data is created that allow personal reference, but is used by us for troubleshooting and statistical purposes only, without the personal reference being created. Furthermore, as part of the use of other personal information may be processed, which we have explicitly sent to you (for example, in the context of booking event tickets).

As a registered member on the platform, the personal data you have released for use in order to use the CIRCLER.WORLD platform will also be processed. The data collected assists in, inter-alia:

- a) connecting Ladies amongst themselves;
- b) searching for Ladies using specific filters, such as Circle number or profession;
- c) administration of events at local, national and international level;
- d) marking and commenting of articles;
- e) provision and download of photos and documents.

The basic functionality requires the following personal data to be provided by you or to be collected by us to allow you to login to CIRCLER.WORLD and use the platform: first name, last name, Circle number, Circle name and date of birth.

According to the constitution of Ladies' Circle an age limit for membership in Ladies' Circle International applies. This ranges from 18 to 45 years (constitutionally legal exceptions may apply). Therefore, it is not possible to use the platform without specifying your date of birth. Apart from a justified exceptional case, it cannot be changed or deleted, as this would be contrary to the constitution of Ladies' Circle International. Thus, a complete deletion of the profile is necessary. You have the option of completing your member profile with additional personal data. You can freely decide at any time at which level of the platform this data shall be shared.

Depending on how you use this portal, personal data may be forwarded to contracted service providers of ours. This data transmission takes place in individual cases to fulfil a contract (for example for payment purposes for a Ladies' Circle event). In this case, we ensure that we are clearly identifiable as the responsible body for the use of the data.

Your personal data may also be used for promotional purposes for Ladies' Circle events from other Ladies' Circle associations, which is an integral part of this platform. You can decide at any time if you want to receive notifications of this kind.

We use various external analysis, optimization and service applications to offer and improve our service. Most of these services use so-called "cookies". For more information about cookies, as well as information on how to prevent the storage of cookies, see point 8.

Any communication required will be in strict compliance with applicable data protection regulations, with adequate security, and only to the extent necessary to provide CIRCLER.WORLD and on the basis of a written agreement in accordance with applicable law.

The EU-U.S. Privacy Shield Framework provides EU and US companies with a mechanism to comply with data protection requirements when transferring personal data from the European Union to the United States. All subcontractor of CIRCLER.WORLD located in the US, are part of the Privacy Shield Framework to ensure the highest standards of protection of your personal information.

5. Subcontractor / third-party supply

DigitalOcean

DigitalOcean is one of the largest cloud computing platforms. Our web servers, databases and backups are hosted within DigitalOcean's Virtual Private Servers (named Droplets) that PeepI controls. All data is stored inside Europe, mostly in the AMS3 datacentre (Amsterdam, NL).

[More information about DigitalOcean & GDPR.](#)

Amazon Web Services (AWS)

PeepI uses AWS for secure, versioned file hosting with automatic backups to ensure that no data gets lost. All photos and documents are stored in the **eu-central-1** region in Frankfurt (Germany).

[More information about AWS & GDPR.](#)

Service Specific Sub processors

Sentry.io

Sentry is an error reporting tool that provides PeepI with detailed insights and saves an incredible amount of time when debugging. In some cases, personal data is included in the error report, mostly the full name and username of the user that encountered the error. Here are some of the measures that are taken to ensure your data is safe:

- Report data in Sentry is automatically deleted after 90 days
- PeepI signed a Data Protection Addendum (DPA) with Sentry to ensure compliance
- Sentry stores data outside of the EU, but conforms to the [EU-US Privacy Shield](#), which means that they take sufficient security measures for data transfer

[More information on Sentry & GDPR](#)

SendGrid

To ensure the best email delivery possible, PeepI work with SendGrid to send emails on our behalf. This includes both **transactional** emails (notifications, password resets...) and **non-transactional** emails (activity invites, newsletters...). Given the nature of these emails, they often contain personal

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information like email addresses, first names, usernames.



SendGrid's steps to ensure it is GDPR-ready include:

- Being [EU-US Privacy Shield](#) certified.
- Providing a Customer Data Protection Agreement (DPA), which Peopl signed
- Vendor agreements review to ensure that their own vendors are GDPR compliant

[More information on SendGrid & GDPR](#)

Twilio

Twilio allows customers to reliably send text messages (SMS) through an easy-to-use online application interface (API). Peopl uses Twilio only for its own **SMS module**. The only personal data that Twilio handles are the phone numbers of the recipients. Twilio is EU-US Privacy Shield certified (amongst other security best practice labels).

[More information on Twilio & GDPR.](#)

Intercom

Peopl rely on Intercom for (live) support and customer engagement. Intercom only processes data of administrators and managers (not of end users) as these are the only users that have access to the support desk. Peopl sends your name, username, email, phone number and usage-specific data about your account to Intercom. Our support agents can use this data to help you out faster and more efficiently.

Intercom is a US company and is EU-US Privacy Shield certified. Peopl are currently in the process of signing a DPA with Intercom.

[More information on Intercom & GDPR](#)

6. Scope of the data processed by us

When using the portal, without being a registered member or as a registered member but not logged in, the following data is being processed by us:

- IP address
- Internet browser and device type, etc.

The provider of the pages automatically collects and stores information in so-called server log files (access logs), which your browser automatically transmits to us. These are usually:

- IP address
- Directory user protection
- Date / time
- Called pages
- Protocols
- Status Code
- Amount of data
- Referrer
- User Agent
- Called hostname

The IP addresses are stored anonymously. Error logs that log pageview errors are deleted after seven days. A merge of this data with other data sources will not be done. Data whose further retention is required for evidential purposes shall be exempted from the cancellation until final clarification of the incident.

When using the portal as a registered member, the data communicated via the respective national organization are processed, which can be adapted, supplemented or deleted at any time:

- Surname
- Contact information

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- Postal address, e-mail address, mobile phone number
- Gender (optional)
- Date of birth (according to the statutes, use without date of birth is not possible; subsequent change is excluded, except for the justified individual case)
- Language preference
- IP addresses

7. Legal basis for data processing

The data mentioned above is used for the respective purposes and have the following legal basis:

- By consent: We rely on your consent to use your personal information. Use is made by logged-in members with consent in accordance with Art. 6 para. 1 lit. a GDPR or
- Performance of a contract: The use of your personal information is necessary to perform the contract you have with PeepI. To fulfill the user contract (e.g. booking of an event) within the meaning of Art. 6 para. b GDPR
- Legitimate interests: If you use the site without being logged in, Art. 6 para. 1 lit. f GDPR.
 - The legitimate interest follows from the following purposes:
 - Improving and guaranteeing the connection to the website
 - Improvement of the possibility of using the website
 - Evaluation of system security and stability
 - Administrative purposes to meet our legal and regulatory obligations, PeepI will hold your personal information for a period of 7 years from the date on which our relationship is terminated.

8. Cookies and web beacons (so-called counting pixels)

Cookies

When you visit our website, small files called cookies are stored on your computer. They serve to make our offer more user-friendly and safer. Most of these cookies are temporary, so-called "session cookies" and will be deleted after the visit to our website. Others stay on your computer until you delete them. Such cookies are used to recognize your browser when pay your next visit to our website. You can view the contents of these cookies in your browser and prevent the storage of cookies on your computer. If you prevent the storage, you may not be able to fully use all the features of our website.

Web beacons (clear gifs, pixels)

Web beacons are clear gifs designed to anonymously track the online usage behavior of our site. Clear gifs are tiny graphics with a unique identifier that works similarly to cookies and serves to track the online movements of web users. Unlike cookies which are stored on the user's hard drive, clear gifs are invisibly embedded on web pages or in e-mails and have about the size of the dot at the end of this sentence. In addition, PeepI can also use clear gifs in HTML-based emails to track which emails are opened and which recipients' links are clicked on.

9. Controllers and processors of data, transfer of data

CIRCLER.WORLD does not transmit any personal data outside the EU or EFTA for processing purposes. A transfer of the data takes place exclusively for utilization purposes, as described in No. 10. Should CIRCLER.WORLD intend to transfer data for processing purposes to a country outside the EU in the future, all users will be informed in good time and their consents will be sought in due form, unless otherwise expressly provided by the users. In such a case, CIRCLER.WORLD will ensure that the parties involved in the data processing comply with at least the same data protection standards as applicable within the EU.

Data Controller:

Vice President Ladies' Circle International
vicepresident@ladiescircleinternational.org

Companies involved in data processing:

Mockup BVBA / Peepl | support@peepl.de

The national organizations involved in the utilization are:

Ladies' Circle International (LCI) | info@ladiescircleinternational.org and the National Associations under the umbrella organization LCI in accordance with Annex A.

10. Transmission to other countries

CIRCLER.WORLD is generally accessible to all Ladies worldwide and shares your personal information globally with other Ladies' Circle Associations to perform the activities described in this privacy policy. This includes associations in the countries according to the Ladies' Circle list of associations worldwide Annex A. The respective national Ladies' Circle Association is part of the umbrella organization Ladies' Circle International. CIRCLER.WORLD consists of databases and data that is processed in different countries. These databases are operated either by the respective national Ladies' Circle Association or by third parties on behalf of the National Association. All Ladies' Circle organizations act as common controllers of the data and have access to their local databases as needed.

CIRCLER.WORLD may also outsource the processing to third parties as a subcontractor or share your personal information with third parties who are located in countries other than your home country. Your personal information may therefore be subject to data protection laws that differ from those in your country of residence and CIRCLER.WORLD shall ensure that these jurisdictions have equivalent data protection laws and safeguards towards the privacy rights of the users.

For example, personal data collected within the European Union may be transmitted to and processed by Ladies' Circle Associations located in a country outside the European Union. In such cases, CIRCLER.WORLD will ensure that the transmission of your personal data is carried out in accordance with applicable data protection laws and, in particular, that appropriate contractual, technical, and organizational measures exist, such as the standard approved by the EU Commission contractual clauses.

Further details on the security measures Peepl use to protect your personal information can be found in the sections below. The contact point for all personal data is the data protection officer named in point 3.

11. Security of the data

We are committed to protecting the personal information of our users. We implement appropriate technical and administrative measures to protect the security of your personal information. We have established a binding system of standards, principles, rules and tools to ensure effective privacy and data protection

Any transfer that may be required will be carried out in accordance with the applicable protection provisions, with adequate security, only to the extent necessary to provide the service of the Portal, and on the basis of a written agreement in accordance with applicable law.

Your password protects your user account, so we urge you to use a unique and strong password with at least 8 characters. For additional security, two-factor authentication is implemented as an option.

We also recommend restricting access to your computer and browser and logging out of CIRCLER.WORLD after use.

12. Your options

Privacy settings

You may, at any time, decide individually for all categories of additional personal data in accordance with point 6 that we process from you, whether you wish to share this information with the levels locally, regionally, nationally or internationally.

Messaging settings

You can choose which messages you would like to receive from CIRCLER.WORLD, in particular the

system-internal notifications about events, surveys, newly added photos or documents or comments.

13. Your right to information

As a user, you have the right to obtain information about which personal data has been collected or stored relating to you. You can review your submitted personal information while logged in to the portal. Upon request, Ladies' Circle International will provide you information about the collection, storage and use of your data in the context of statutory provisions, free of charge.

14. Your right to correction, to be forgotten and the duration of data storage

A registered user or user that has a booking who goes beyond merely surfing the portal page, can change and correct the information about himself by logging in. He has the right that all personal data concerning him can be completely and permanently deleted on request.

If a user wishes their personal data to be corrected or deleted, it is sufficient to send a message to info@ladiescircleinternational.org specifying the respective information we need to correct, update or delete, along with an appropriate form of identification to ensure the legality of the request.

These applications are subject to Ladies' Circle International statutory retention requirements.

Personal data may be deleted in all databases of Ladies' Circle International or the respective national organization.

To ensure technical operation Ladies' Circle International creates backups of all databases that are automatically overwritten within four weeks. Please note that due to this procedure, which is necessary for the proper operation of our systems, there is a latency period of 30 days between the removal from the active databases and any backup copies.

Please note that we may not be able to fully provide you with the use after the removal of the data.

Your data is usually stored for as long as the contractual relationship with Ladies' Circle International requires. Upon termination of the Agreement, Ladies' Circle International will remove all of your information from the Systems, subject to the statutory retention obligations imposed by applicable law. You have the right to file a complaint with a federal or state regulatory authority under your national law implementing the GDPR if you consider the processing of your personal data by Ladies' Circle International be unlawful.

15. Your right to data portability

Data processed on the basis of the user's consent (in particular profile data on CIRCLER.WORLD) and data processed under a contract (especially when booking events) can be requested by the person responsible in CSV or XLSX format at any time.

16. Your right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Controller. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

17. Changes to this Privacy Policy

We may be developing new features or offering additional services in the future. Should the introduction of these new features or additional services change the way we collect or process your personal information, we will notify you by email or system notification. Unless otherwise stated, these new features or additional services are subject to this Privacy Policy.

ANNEX A | Ladies' Circle associations worldwide

Austria	Morocco
Belgium	Nepal
Botswana	Norway
Burundi	Romania
Cyprus	South Africa
Denmark	Sweden
Estonia	The Netherlands
Finland	Zambia
France	Zimbabwe
GB & I	Kenya
Germany	Malta
Hong Kong	Mauritius
Iceland	Portugal
India	Singapore
Israel	Slovenia
Italy	Spain
Latvia	Sri Lanka
Lithuania	Switzerland
Luxembourg	Tunisia
Madagascar	United States of America