

# Privacy Policy

Effective Date: July 31, 2018

Travel Learning Connections, Inc. dba Educational Travel Consortium (“ETC” or “we” or “us”) knows your privacy is important. We take protecting it seriously. We have created this Privacy Policy to help you understand how we collect, use, process and protect your Personal Data and the information we collect through our website.

The current version of this policy will apply each time you visit our website. When you use our website, please check the date of this policy and review any changes. This policy applies to all users of our website at [www.educationaltravel.travel](http://www.educationaltravel.travel) and all related pages and apps and microsites contained within.

On our website, you may request information, subscribe to our newsletter, register for membership and conferences, services and materials, participate in our surveys, and use any other services we provide. To take advantage of these benefits, it is necessary for you to disclose personal data. “Personal Data” is any information that allows us to identify you such as your name, title, institution, location, or other factors specific to your professional identity.

By visiting [www.educationaltravel.travel](http://www.educationaltravel.travel) or related pages, (together the “website”) you acknowledge that you have read and understood this policy.

## WHO WE ARE

For the purposes of the General Data Protection Regulation (GDPR), the Data Controller is TLC, Inc. registered in the state of Montana with a registered address of P.O. Box 159, Ronan, MT 50864.

## HOW TO CONTACT US

If you have any questions or concerns about this policy, please contact us:

Travel Learning Connections, Inc.  
P. O. Box 159  
Ronan, MT 59864  
Phone: 406-745-4800  
Fax: 406-745-3600  
[etc@educationaltravelconsortium.com](mailto:etc@educationaltravelconsortium.com)

## HOW WE COLLECT PERSONAL DATA

### Information you give us

**Contact information**, which you provide when corresponding with us by phone, e-mail or otherwise. This includes information you provide when you participate in member forums or complete forms on our website. The information you give us may include your name, job title, institutional affiliation, address, e-mail address, phone number, and/or credit card information when booking online for membership or the conference.

**Membership information**, including your name, contact details, job title, and any other information related to your membership. Membership information may be provided by you during the membership process, or by another employee on your behalf. You also have the option to complete a brief member profile sharing a limited amount of information at your election on your interests as well as a bio and photo.

**Organization Information**, including the name of your institution/company, and any information as stated in questions related to the operational and marketing details. This information is further restricted for viewing question by question to the specific member constituencies identified. You or another employee on your behalf can complete profile.

**Registration information**, including credit/debit card and account numbers used to register for the annual conference, community roundtables or other events requiring a fee.

**Purchase information**, relating to purchases made by members and event attendees. Purchase information will include financial information as well as information concerning the content and time of the purchase.

**Survey information**, relating to questions asked of our members in optional questionnaires. This may include name, email address and information about personal or professional preferences and needs. If the survey is “anonymous” this means that your personal information is not stored in relation to your survey response.

**App information**, relating to questions asked of our members in optional mobile event planning apps. This may include name, email address and information about personal or professional preferences and needs.

#### **Personal data we collect:**

**Public information**, including contact information found online.

**Technical information**, including the IP address used to connect your device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

**Information about your visit**, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page

#### **Personal Data we collect from others**

We may receive information about you from publicly available that list information about businesses and institutions providing travel. We will obtain your consent before contacting you if required by the law of the country in which you are located.

#### **Non-Personal Data**

**Information We Collect through Google Analytics:** Users who visit this website and have javascript enabled are tracked through Google Analytics. Google Analytics collects information anonymously and reports website trends to us without identifying individual visitors. Google Analytics collects a variety of information from users, including the IP address that is used to connect your computer to the Internet

(which it does not report to us), your ISP, browser type, type of operating system, the URL clicks to, through, and from our website, including date and time, cookie, the length of time you spend on particular pages, which links you click while on our site, and similar site visit information. Google Analytics data is shared with Google. For more information on Google Analytics or to opt-out of having your information shared through Google Analytics, visit:

<http://www.google.com/intl/en/analytics/privacyoverview.html>.

We use this information to make our website easier to find on the Internet and to improve our website by learning which pages and features are interesting to our visitors. We treat this information as non-personal information and do not attempt to connect it to personally identifiable information, except as otherwise required by law.

## **HOW WE USE YOUR PERSONAL DATA**

We will only process your Personal Data, including sharing it with third parties (i.e. colleagues within the ETC community), where A) you have provided as requested your consent, which can be withdrawn at any time, B) it is necessary for the performance of a contract to which you are a party, C) we are required by law, D) processing is required to protect your vital interests or those of another person, or E) processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

### **Personal Data that you give us**

We may use Personal Data that you provide directly to us for the following purposes:

- to carry out our obligations arising from your membership, or any other contract entered into between you and us and to provide you with the information, products and membership services that you request from us;
- to organize events that you have registered for, and to provide you with information, and other materials, relating to the content of the event, the speakers, sponsors and other attendees;
- to provide our newsletter and other publications, provided you have given your consent;
- to respond to your questions and provide related membership services;
- to provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- to transfer your information as part of a merger or sale of the business;
- to notify you about changes to our membership service; and
- to ensure that content from our website is presented most effectively for you and your device.

### **Information we collect about you**

We will use Personal Data that we have collected about your use of our website

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented most effectively for you and your device
- as part of our efforts to keep our website safe and secure;

- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

#### **Personal Data we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Data for the purposes set out above.

#### **WHEN WE SHARE AND WHO CAN ACCESS YOUR PERSONAL DATA**

We may share your Personal Data for the purposes described in this policy with:

- a member of our Community, i.e. partners, suppliers, and sub-contractors, for the performance of obligations arising from your membership, or any other contract we enter into with them or you or to provide you with the information, products and membership services that you request from us
- analytics and search engine providers that assist us in the improvement and optimization of our website
- trusted third-party companies and individuals to help us provide, analyze, and improve the website and our membership services (including but not limited to data storage, maintenance services, database management, web analytics and payment processing)
- in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets

#### **SELLING YOUR PERSONAL DATA**

We do not sell your Personal or Professional Data to third parties.

#### **SECURITY**

Although we use security measures to help protect your Personal Data against loss, misuse or unauthorized disclosure, we cannot guarantee the security of information transmitted to us over the internet.

All information you provide to us is stored on secure servers.

Any payment transactions will be encrypted using SSL technology.

#### **TRANSFER OF PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (“EEA”) AND INTERNATIONAL USERS**

We are headquartered in the United States. Your Personal Data may be accessed by us or transferred to us in the United States or to our affiliates, partners, merchants, or service providers who are located worldwide. If you are visiting our website from outside the United States, be aware that your information may be transferred to, stored, and processed in the United States where our servers are located, and our database is operated. By using our services, you consent to any transfer of this information.

## **HOW LONG WE STORE YOUR PERSONAL DATA**

We will store your Personal Data, in a database which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your Personal Data quickly upon request.

### **Retention**

We will retain your information for as long as your account is active or as needed to provide you with our website. If you wish to cancel your account or request that we no longer use your information to provide you service, contact us at [etc@educationaltravel.travel](mailto:etc@educationaltravel.travel). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We maintain one or more databases to store your Personal Data and may keep such information indefinitely.

## **WHERE WE STORE YOUR PERSONAL DATA**

The Personal Data that you provide to us is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personal Data is submitted through our website, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place.

## **CHILDREN'S PRIVACY**

Our website is not directed to children under the age of 16, nor do we advocate the use of our website for children under 16. We do not knowingly collect Personal Data from children under the age of 16. If we learn that Personal Data of persons less than 16 years-of-age has been collected, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 16 has posted, submitted or otherwise communicated Personal Data without your consent, then you may alert us at [etc@educationaltravelconsortium.com](mailto:etc@educationaltravelconsortium.com) so that we may take appropriate action to remove the Personal Data.

## **LINKS TO THIRD PARTY SITES AND SERVICES**

Our website may contain links to third party websites, applications, and services not operated by us. These links are provided as a service and do not imply any endorsement by us of the activities or content of these sites, applications or services nor any association with their operators. The company is not responsible for the privacy policies or practices of any third party including websites or services directly linked to our Service. We encourage you to review the privacy policies of any third party site that you link from our Service.

## **YOUR RIGHTS**

### **Correction and removal**

If any of the information that we have about you is incorrect, or you wish to have information (including Personal Data) removed from our records, you may do so by emailing us at [etc@educationaltravelconsortium.com](mailto:etc@educationaltravelconsortium.com)

### **Opting Out**

Additionally, if you prefer not to receive e-mail messages from us, please let us know by clicking on the unsubscribe link at the bottom of any message that you receive or by sending a message to us at [etc@educationaltravelconsortium.com](mailto:etc@educationaltravelconsortium.com).

### **Your European Rights**

EUROPEAN RESIDENTS ONLY. You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right by contacting us at [etc@educationaltravelconsortium.com](mailto:etc@educationaltravelconsortium.com).

Under European data protection law, in certain circumstances, you have the right to:

- Request access to your Personal Data. You may have the right to request access to any Personal Data we hold about you as well as related information, including the purposes for processing the Personal Data, the recipients or categories of recipients with whom the Personal Data has been shared, where possible, the period for which the Personal Data will be stored, the source of the Personal Data, and the existence of any automated decision making.
- Request correction of your Personal Data. You may have the right to obtain without undue delay the rectification of any inaccurate Personal Data we hold about you.
- Request erasure of your Personal Data. You may have the right to request that Personal Data held about you is deleted.
- Object to the processing of your Personal Data. You may have the right to prevent or restrict processing of your Personal Data.
- Request restriction of processing your Personal Data Request transfer of your Personal Data. You may have the right to request transfer of Personal Data directly to a third party where this is technically feasible.
- Withdraw your consent

In addition, where you believe that ETC has not complied with its obligations under this Notice or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

### **Your Californian Rights**

CALIFORNIA RESIDENTS ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personal Data with third parties. If you reside in California and have provided your Personal Data to us, you may request information about our disclosures of certain categories of Personal data to third parties for direct marketing purposes. Such requests can be submitted to [etc@educationaltravel.travel](mailto:etc@educationaltravel.travel).

## Disputes

By visiting our website, you agree that any dispute relating to or arising out of this Privacy shall be resolved exclusively by binding arbitration. The binding arbitration shall take place in Montana, in accordance with the rules of the American Arbitration Association. Such proceedings will be governed by substantive (but not procedural) Montana state law. The arbitrator and not any federal, state or local court or agency shall have exclusive authority to resolve any dispute relating to the interpretation, applicability, enforceability, conscionability, or formation of this contract, including but not limited to any claim that all or any of this Privacy Policy is void or voidable.

### **CHANGES TO THIS NOTICE**

If we make any material changes to this policy or the way we use, share or collect personal Data, we will notify you by revising the “Effective Date” at the top of this Notice, or prominently posting an announcement of the changes on our website or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to this Notice in the future will be posted on this page. Please check back frequently to see any updates or changes to this Notice.

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