

## **Privacy Policy of InterNations GmbH (“InterNations”)**

**for the use of the services under the top level domain [www.internations.org](http://www.internations.org)**

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### **Part A: Privacy Principles**

Welcome to InterNations! The protection of your privacy and your personal data is taken very seriously and of utmost concern for InterNations.

InterNations is a community of trust which helps its members at the Internet portal [www.internations.org](http://www.internations.org) to exchange and share information as well as to connect with other members. InterNations ensures highest standards for the protection of your personal data and your privacy.

This Privacy Policy supplements the General Terms and Conditions for using [www.internations.org](http://www.internations.org) and any of its sub-domains and aliases of these domains (“InterNationsWebsite(s)” or “Website(s)”), governing the entire relationship between the validly registered user (“User”) and InterNations and are applicable to all services provided to the User or offered on the InterNationsWebsites (“InterNationsService(s) or Service(s)”) and also to all the User’s actions, contents, or other material relating to the InterNationsWebsites.

This Privacy Policy is designed to help you better understand how InterNations collects and deals with your personal data and information.

If you have any questions or comments regarding this Privacy Policy, please contact InterNations by using the contact form available on each InterNationsWebsite under “Contact”, or by sending a fax or letter to InterNations GmbH, Schwantalerstrasse 39, 80336 München, Germany.

By registering to use the InterNationsWebsites, you consent to the practices described in the following Privacy Policy.

#### **1. InterNations Principles**

InterNations works hard to earn and keep its User’s trust. Therefore InterNations strictly adheres to the following principles to protect the User’s privacy:

InterNations collects, processes, and uses all data and/or information about and related to the User’s person and the User’s account with InterNations (“Personal Data”) in accordance with the laws and statutes on data protection of the Federal Republic of Germany and those of the European Union.

InterNations uses Personal Data solely to provide the User with the InterNationsServices. InterNations will never rent, sell, or otherwise provide Personal Data to any third party for advertising or for marketing purposes without the User’s consent. The User is aware of the fact and agrees that in case of online debiting procedures (i.e. payment via credit card) any data (e.g. name, credit card number, expiry date, bank details etc.) which is necessary for the due processing of such payment will be transferred to third parties involved in the execution of the debiting procedure (e.g. operator of the payment module, credit card acquirer and the bank issuing the credit/debit card).

## **2. Information Collection by InterNations**

### **2.1 Registration**

In order to become a User of InterNations, it is necessary to first create an account on the InterNationsWebsite. To create an account, the User is required to provide the following mandatory contact information: full name; email address; gender; date of birth; nationality; country and city of origin; local community at InterNations; street, postal code, and country of residence. In addition, the User must choose a password. The User's password and/or User name are never visible to any other User of InterNations or any third party at any time.

### **2.2 Profile Information and User Content**

After successful registration with InterNations, the User may provide additional information about himself/herself (e.g., international experience, professional background, interests). Providing additional information beyond what is required at registration is entirely optional and on a voluntarily basis, but enables the User to better use the Services. Additionally, the User can upload, publish, send, or display comments, photos, profiles, messages, notes, text, information, music, video, advertisements, listings, and other content ("User Content") on or through the InterNationsService or the InterNationsWebsites, or transmit to or share with other Users or third parties accessing the InterNationsWebsites. The User may also form relationships with other Users, perform searches and queries, and form groups. InterNations collects all the aforementioned information so that InterNations can provide the User with the -Services and offer personalised features. In most cases, InterNations retains the information so that, for instance, the User can return to view prior messages he/she has sent. When the User updates information, InterNations usually keeps a backup copy of the prior version for a reasonable period of time to enable reversion to the prior version of that information.

### **2.3 Information about the User's Contacts**

If the User chooses to invite other people to InterNations to join his/her network, the names and email addresses of the invitees need to be entered on the InterNationsWebsite. The names and email addresses of people that are invited will be used by InterNations only to send the User's invitation email (including an optional personal message) and corresponding reminders. InterNations stores this information to send the invitation email, to register a contact connection if the User's invitation is accepted, and to track the success of InterNations' referral program.

The User may also choose to manually enter or upload data about his/her contacts into the private section of the InterNationsWebsite. All information that the User enters or uploads about his/her contacts will be covered by the same terms of this Privacy Policy as those covering his/her own personally identifiable information.

### **2.4 Cookies and Log Files**

Like most websites, InterNations uses cookies to identify the User during the course of his/her session and to recognise him/her as a user when he/she returns to the InterNationsWebsites using the same computer and web browser. A cookie is a piece of data stored on the User's computer tied to information about the User. InterNations uses session ID cookies to confirm that the User is logged in. These cookies terminate once the User closes the browser. By default, InterNations uses persistent cookies that store the User's login ID (but not the password) to make it easier for the User to login when he/she comes back to the InterNationsWebsites. These cookies will then store part of the login

data in encrypted form. If the User selects the automatic login, he/she should be aware that this will then only be possible on the same computer on which the cookie was first saved, i.e., an automatic login on two (2) different computers is not possible. The User can remove or block this cookie using the settings in the browser if he/she wants to disable this convenience feature. Unfortunately, if the browser settings do not allow cookies, the User will not be able to use the InterNationsWebsites.

Each time the User accesses the InterNationsWebsites, InterNations automatically receives the URL of the site from which the User came and of the site to which the User is going when leaving the InterNationsWebsites. InterNations also receives the Internet protocol (IP) address of the User's computer (or the proxy server the User uses to access the World Wide Web), the computer operating system and type of web browser he/she is using, as well as the name of the User's ISP. This data is saved in a log file and will be stored by InterNations in the standardised combined log file format unless the User objects to the processing of such data and notifies InterNations accordingly by sending a fax or letter to InterNations. The information is used in anonymous form to analyse overall trends to help InterNations improve its service, e.g., InterNations may analyse on which days and at which time the InterNationsWebsites are particularly frequented. The linkage between the User's IP address and his/her personally identifiable information is never shared with any third party without the User's permission except when required by law. InterNations reserves the right to review the log files from the last known IP address of the User where InterNations has reasonable cause to believe that the User is using InterNationsServices in breach of contractual agreements or the applicable legislation. In doing this, InterNations protects other users, the safety of its user's data, as well as InterNationsWebsites and the InterNationsServices.

Like the information the User enters at registration or in his/her profile, cookie and log file data is used to customise the User's experience on the InterNationsWebsites.

## **2.5 Information Collection from other Sources**

InterNations reserves the right to use information about the User that is collected from other sources, including but not limited to newspapers and Internet sources such as blogs, instant messaging services, and other Users at InterNations, to supplement the User's profile in order to provide the User with more useful information and a more personalised experience. Where such information is used, InterNations generally allows the User to specify the use in the privacy settings.

## **3. Sharing Information with Third Parties**

### **3.1 Sharing Personal Data with other Users of InterNations or third parties**

Profile information the User submits to InterNations will be available to other Users of InterNations depending on the User's chosen individual privacy settings.

Posting User Content on or through the InterNationsService or the InterNationsWebsites, or transmitting to or sharing with other Users on the InterNationsWebsites is at the User's own risk. Although InterNations allows the User to set privacy options that limit access to his/her personal information, the User should be aware that no security measures are perfect or impenetrable and the User's Personal Data, his/her User Content and other information may become publicly available. InterNations cannot control the actions of other Users with whom the User may choose to share data and information. Therefore, InterNations cannot and does not guarantee that Personal Data, User Content, and other information the User posts on InterNationsWebsites will not be viewed by unauthorised persons. InterNations is not responsible for circumvention of any privacy settings or

security measures contained on the InterNationsWebsites. The User understands and acknowledges that, even after removal, copies of Personal Data, User Content, and other information may remain viewable in cached and archived pages or if other Users have copied or stored this data and information.

Any information and User Content (except personal messages to other Users) the User has submitted to InterNations or to others via the Plattform may be accessed by third parties (i.e. non-registered users) when they visit InterNationsWebsites. Such information and content may also be found and made accessible by search engines (e.g. Google, MSN, Yahoo etc.).

### **3.2 Information about the User's Activity on Profiles of other Users**

If the User visits a profile of another User of InterNations, this User may see that the User has visited his/her profile. This feature is an essential part of contact management on the InterNationsWebsites and as such an essential part of the InterNationsServices.

### **3.3 Newsletters, Emails, and Notifications to Users**

InterNations regularly sends out newsletters, service-related announcements, or other notification messages and emails (altogether "Member Communication") to all Users of InterNations. Through this Member Communication InterNations informs the User, among other things, about new features, changes in his/her network or local community, invitation requests, and new messages. InterNations may also provide the User with specific personal statistics.

As part of the Member Communication, InterNations may present new Users of InterNations to the User. It may also be the case that InterNations presents the User as a possible contact to other Users of InterNations. Finally, InterNations may inform the User about random Users of InterNations who have visited the User's profile. Of course, this may also apply to the User vice versa, i.e., the User may be one of those random Users with regard to another User of InterNations whose profile the User has visited.

Generally, the User may opt out of such Member Communication through his/her individual personal settings, though InterNations reserves the right to send the User notices about his/her account even if the User opts out of all voluntary forms of the Member Communication.

### **3.4 Information Sharing with Third Parties**

InterNations does not forward the User's Personal Data, his/her User Content, or other information to third-party marketers without the User's permission. InterNations shares Personal Data, his/her User Content, and other information with third parties only in limited circumstances where InterNations believes such sharing is legally permitted and either 1) reasonably necessary to offer the InterNationsService or, 2) legally required or, 3) permitted by the User. For example:

InterNations may forward Personal Data, User Content and other information to service providers (including service providers located outside the European Union) to help InterNations offer the InterNationsServices. Specifically, InterNations may use third parties to facilitate InterNations' business, such as to host the service at a co-location facility for servers, to send out email updates about InterNations, to remove repetitive information from User lists, to process payments for products or services, or to provide search results or links. In connection with these offerings and business operations, the InterNations' service providers may have access to the User's Personal Data, his/her User Content and other information for use for a limited time in connection with these business activities. Where InterNations utilizes third parties for the processing of any personal information,

InterNations will implement reasonable contractual and technical protections limiting the use of that information to the InterNations-specified purposes.

InterNations may be required to disclose Personal Data, User Content or other information in compliance with applicable laws or pursuant to lawful requests, such as subpoenas or court orders. InterNations does not reveal information unless InterNations has the bonafide belief that an information request by law enforcement or private litigants meets applicable legal standards. Additionally, InterNations may share account or other information when InterNations believes it is necessary to comply with the law, to protect the interests or property of InterNations, to prevent fraud or other illegal activity perpetrated through the InterNationsService or using the InterNations name, or to prevent imminent bodily harm. This may include sharing information with other companies, lawyers, agents, or government agencies.

If the complete or partial ownership of the InterNations business, or individual business units owned by InterNations GmbH, were to change, the User's personal information may be transferred to the new owner or shareholder. In any such transfer, the User's Personal Data, his/her User Content, and other information would remain subject to the promises made in any pre-existing Privacy Policy.

InterNations may use the User's Personal Data, his/her User Content, or any other information in an anonymous way without identifying the User as an individual to third parties. This includes for instance providing aggregated data about the usage of the InterNationsService to third parties for such purposes as InterNations deems to be appropriate. InterNations may segment its Users by e.g., gender, age, geographic location, nationality, or employer.

## **4. Miscellaneous**

### **4.1 Under Age**

Children and minors (under the age of 18) are not eligible to use any InterNationsService and are therefore not allowed to submit any personal information to InterNations. Parents and legal guardians are responsible for the protection of their children's privacy.

### **4.2 Links**

InterNations may contain links to other websites. InterNations is not responsible for the privacy practices of other websites. InterNations encourages the User to be aware when he/she leaves the InterNationsWebsites to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by InterNations.

### **4.3 Changing or Removing Information**

Access and control over most personal information on InterNations is readily available through the profile editing tools on the InterNationsWebsites. The User may modify or delete any of his/her profile information except the mandatory information required during the registration process at any time by logging into his/her account. Information will be updated immediately. Users who wish to deactivate their account with InterNations should send a fax or letter to InterNations. In this case InterNations will remove the User's name and other personally identifiable information from publicly viewable data. InterNations may retain certain data contributed by the User if it may be necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-

personally-identifiable data, account recovery, or if required by law. All retained data will continue to be subject to the terms of the Privacy Policy that the User has previously agreed to.

Where the User makes use of the communication features of the service to share information with other Users of InterNations, however, (e.g., sending a personal message to another User of InterNations) the User generally cannot remove such communications.

#### **4.4 Terms of Use, Notices, and Revisions**

The use of InterNationsServices, and any disputes arising from it, are subject to this Privacy Policy as well as InterNations' General Terms and Conditions for the use of the services under the top level domain [www.internations.org](http://www.internations.org) and all of its provisions including limitation on damages and choice of law. InterNations reserves the right to amend this Privacy Policy at any time insofar as these amendments are not unreasonable for the User. InterNations shall give due notice of any amendments of this Privacy Policy to the User via the User's email address or by placing a notice in the User's personal inbox on the InterNationsWebsite. The amendments to the Privacy Policy shall be effective from that point in time unless the User objects within two (2) weeks after receipt of said notice by sending a fax or letter to InterNations, provided that InterNations has explicitly informed the User about the consequences of such non-objection.

### **Part B: User's Consent**

**The User acknowledges the principles set forth in this privacy policy (Part A) and also consents to the processing of his/her personal data as described below. The User shall be entitled to revoke his/her consent at any time and with effect for the future. For such revocation please contact InterNations by using the contact form available on each InterNationsWebsite under "Contact", or by sending a fax or letter to InterNations GmbH, Schwanthalerstrasse 39, 80336 München, Germany. The User declares the following:**

#### **1. Single-Sign-On-Process**

**I agree** that InterNations shall be entitled to pass on personal data (first name, last name and email-address) to third party providers for the purpose described hereinafter:

Third parties may offer certain services on or via the InterNationsWebsites (e.g. via the Event Ticket Shop tool). If the User decides to order such services he/she will access the third parties' websites through a link or frame embedded in the InterNationsWebsites and will then have the opportunity to use the third party services. In order to facilitate the ordering process InterNations and such third parties may have agreed on a single-sign-on-process. This means that the User does not have to enter his personal data on the third party website again, but InterNations rather passes on to the third party the personal data which is necessary for the third party service

#### **2. Usage of personal data for marketing purposes of partners of InterNations**

**I agree** that InterNations shall be entitled to process and use my personal data for advertising or marketing purposes of partners of InterNations via the InterNationsWebsites. Particularly, my personal data may be used in order to tailor the advertisement presented to me to my specific interests.

**3. Cookies and Log Files**

**I agree** that InterNations shall be entitled to use Cookies and Log Files as described in section 2.4 of Part A of this Privacy Policy.