

This is the privacy notice of Sagamore Institute. In this document, “we”, “our”, or “us” refer to Sagamore Institute. Our office is located at 6151 Central Avenue, Indianapolis, IN 46220.

## Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We do this now, by requesting that you read the information provided at [knowyourprivacyrights.org](http://knowyourprivacyrights.org)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## Sagamore Institute as a Data Processor

In the course of its daily organizational activities, Sagamore Institute acquires, processes and stores personal data in relation to:

- Users of [www.sagamoreinstitute.org](http://www.sagamoreinstitute.org)
- Users of [www.scholarshipsforeducationchoice.com](http://www.scholarshipsforeducationchoice.com)

## The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **1. Information we process because we have a contractual obligation with you**

When you create an account on our website, make a transaction, or otherwise agree to our terms and conditions, a contract is formed between you and us.

To carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to:

- verify your identity for security purposes
- make a transaction
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## 2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org). However, if you do so, you may not be able to use our website or our services further.

## 3. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having considered:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our programs
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage risk
- protecting your interests where we believe we have a duty to do so

## 4. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorization such as a search warrant or court order.

This may include your personal information.

## Specific uses of information you provide to us

### 5. Information provided on the understanding that it will be shared with a third party

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- Making a donation - if you are a donor we will use your personal information to process your transaction. We will also provide your personal information to the school or cause you have donated to and the creator of any fundraising page involved in your donation. The school or cause may use your personal information to contact you unless you have opted out of receiving further communications from the school or cause. In order to secure a tax credit certification number for an SGO donation the donor name, contact information, and amount of the donation is shared with the Indiana Department of Revenue.
- Scholarship Applications - the legislation governing Indiana's SGO program requires that Sagamore Institute provide the Indiana Department of Education the name, contact information, birthdate, and household income information of any student that has applied for an SGO.

- Newsletters – If you selected to Signup to Sagamore Institute’s Newsletter we will use your personal information when sending newsletters. You may opt out at any time by clicking the “Unsubscribe” link at the bottom of any newsletter email.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org)

## 6. Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

## 7. Information relating to your method of payment

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of Vanco Payments. That page may be branded to look like a page on our website, but it is not controlled by us.

## 8. Job application and employment

If you send us information in connection with a job application, we may keep it for up to 3 years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for 6 years before destroying or deleting it.

## 9. Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our program.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## **10. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

## **Use of information we collect through automated systems when you visit our website**

### **12. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **Disclosure and sharing of your information**

### **14. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

### **15. Sale of Business**

We reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Website Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

## Access to your own information

### 16. Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you may send us a request at [scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org).

After receiving the request, we will tell you when we expect to provide you with the information.

### 17. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at [scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org).

This may limit the service we can provide to you.

### 18. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## Other matters

### 19. Use of site by children

- We do not sell products or provide services for purchase by children, nor do we market to children.
- If you are under 18, you may use our website only with consent from a parent or guardian
- We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.
- Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site marketing they find, wherever they visit.

## 20. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## 21. How you can complain

- If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is [scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org).
- If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Office of the Data Protection Commissioner. This can be done at <https://www.dataprotection.ie/docs/complaints/1592.htm>

## 22. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defense in court.

### **Retention period of data given to Sagamore Institute when donating to a Fundraising Page**

If you provide Sagamore Institute.ie with an email address, postal address or contact telephone number, this data will be retained.

## 23. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## 24. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please [contact us - scholarships@sagamoreinstitute.org](mailto:scholarships@sagamoreinstitute.org).