

Privacy Policy	KSM-002-OM, Rev. 0	BOD Approval: TBD
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Privacy Policy

Policy: This Privacy Policy (“Policy”) addresses how Kenyan Schoolhouse Ministry, Inc. (“KSM”) treats personal information, or personally identifiable information (collectively, “PII” or “personal data”), that may be collected or submitted when the web user (“you”) is inside our website (<https://www.kenyansm.org>).

We use third party vendors for web hosting, collecting donations and similar. They are cited herein and have their own privacy policies.

“Good Faith” Compliance: This policy has been developed based on the best efforts of *compliance with all laws and regulations regarding privacy in good faith.*

IMPORTANT for Residents of Switzerland and Brazil:

As a very small nonprofit, *we do not understand how to effectively comply with your laws regarding data privacy.* We ask that you not use our website for any purpose and log out immediately. Should we ascertain through a donation or other means that you are from these countries, we will contact you promptly in order to stop any further interactions (see also page 5) using online activities with KSM. We really want to include you, if possible, so please consider using international mail. Our Post Office Box address is KSM, PO Box 391, Rockvale, TN 37153 USA. Be sure to include your full return address.

IMPORTANT for Residents of California:

We have developed a privacy policy that is specific to individuals in the State of California. It is found in the “Privacy Policy for California Residents” (KSM-003-OM). It is also a primary link on the web page in every footer section, where it will display as a specific web page in your browser.

While *this* policy is always in effect for Californians, *that* policy provides specific language in order to adhere to, and comply with, the California Online Privacy Protection Act (CalOPPA) of 2003 to the best of our ability.

Approach to Privacy: Please understand that whenever you voluntarily disclose personal data online, this information can’t be made one-hundred percent secure and, in some cases, that information can be intercepted, collected and used by others. We will work hard to protect your information at all times, and to do this in several ways.

The KSM website is hosted by Bluehost (www.bluehost.com), who provides us with Secure Socket Layer (SSL) protocol that is responsible for creating secure communication between client and server. This is done by both server and client authentication and the negotiation of an encryption algorithm and cryptographic keys.

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As an internet user, you likely associate SSL with the “padlock” (🔒) you see in the browser’s address bar when you enter the secure area of a website. You have learned to look for this padlock before entering personal or financial information online. When you’re using the KSM website, be sure to look for the padlock (as shown in the following graphic):



Figure 1 – Padlock Icon in Address Line for KSM Website

If the padlock is not shown, or the website is stated to be “not secure” (or similar), then don’t use it. Let us know immediately by emailing mike@kenyansm.org or calling (865) 228-2912.

How We Gather and Use Personal Information: While using our website, you may submit personal information when, for example, you register for an email correspondence or make a donation. Typically, this will be limited to information such as: name, address, email, phone number and credit or debit card information and age. This personal information is extremely important to us for compliance with various states to be able to correctly report charitable contributions. Also, the financials for a nonprofit have specific requirements and we have to comply with them at all times. A strong reminder here – we’ll address Third Party privacy policies later, but be aware, once the information leaves the KSM website it must be entrusted to organizations that handle the data. At that point, we’ve taken the best precautions possible to protect your privacy.

In limited cases, your IP address may be logged. This will be later on (toward mid to end of 2022) and allows us to understand how you use our site and will enable us to make changes to constantly improve your interactions (experience) while visiting. Information regarding your computer, your connection to our website (such as browser type, operating system and platform) and your user history (including, but not limited to, your session information, page errors and length of your visits to specific pages within our website) may also be collected.

We don’t create or accept typical “user accounts” on our website. You never need a username or password to enter any areas of the website.

Use of Cookies: We uses cookies to remember certain user information. Cookies are electronic identifiers that are transferred automatically to your computer through your browser that allow our computers to save certain information you provide us and store information about you so

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we can recognize you when you visit our website in the future. This allows you to avoid logging in more than once, which saves time, and create a customized website that fits your needs. You may, at any time, disable or refuse to accept cookies by changing the preferences or settings on your web browser. If you choose to disable cookies, you will still be able to use our website. However, you will not be able to fully take advantage of certain automation and other functionality features available

How Your Personal Information is Disclosed: It is our policy not to disclose, sell, rent or otherwise provide, in any manner, your personal information to any individual, business, government entity or outside parties except: (i) to provide products or services you’ve requested through us; (ii) in response to a validly-issued subpoena, court order, or other legal process; (iii) when necessary to establish or exercise our legal rights or defend against legal action; or (iv) when you request us to do so, within reason. There may be disclosures by third party vendors that are not controlled by KSM.

Email and Correspondence: If you desire to reach us via email, a point of contact is provided in the footer region of each web page under “Contact Information.” We will attempt to respond to all email requests and address them on an individual basis. If you have potential privacy concerns, by all means, get them to us promptly! In that same location, we’ve also included a mailing address so that you can use the US Postal Service to get in touch. Simply tells us what’s up and tell us how we can best work with you to fix the potential issue.

Contact Outside of Our Website: Of note, we will never call you and ask for any personal information over the phone. If someone does contact you and ask for personal information, please use our contact information (see Figure 2, below) to reach us as soon as possible. We’ll work with you to determine if any potentially nefarious activities are occurring and will address them immediately. Only use the “Contact Information” from our website, which is always maintained current.

Children’s Privacy: Protecting the privacy of children is especially important to us. This is a Christian ministry, and as such, we report to a much Higher Power in all matters, including privacy. We have developed this website so that it has nothing but enriching and positive messages for anyone that visits, no matter their age. However, if we are able to determine, or suspect, that an individual visitor is not at least eighteen (18) years old, we will notify them that we’ve removed all of their information from our website and ask for their parents to contact us to discuss further site access. We will also take reasonable steps to ensure that they are blocked from further access of the website, as the parent(s) request.

Third Parties: From time to time, the KSM website contains links to other third-party websites. Please be aware that KSM does not claim responsibility for the privacy practices for these third-party websites. If we offer a link to a third-party website, we have checked it out and believe it to be safe. We encourage you to be aware and “click with care!”

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Our ISP for our website is Bluehost (www.bluehost.com); their privacy policy link is located in their footer section on each web page. We use PayPal (www.paypal.com) for donations; their privacy policy is located in their footer section of their main web page. If you look closely, we only associate our corporation with reputable services. These companies are each recognized business sites and their firms are advocates for privacy, but still, read their policies and practices to make sure that you agree.

These third parties almost always use tracking technologies for data collection and online advertising. This may consist of cookies, web beacons, pixels, tags, scripts or other similar technologies in the course of their business. Any time that your data leaves KSM, it is potentially (likely) subject to these technologies.

Reporting Potential Third Party Use of Personal Information: If you receive emails or marketing materials from a third party and suspect that your personal information was gained through your online association with KSM, please notify us immediately so that we can work with our vendors to determine what may have happened. It may not be from us, but we'll still work to figure it all out and report the facts back to you. We'll then work together to move forward in our online relationship, including updating our privacy measures, changing third party vendors or similar.

Website Privacy Design: Our website is very basic, which also helps to serve to protect your privacy; the less opportunities to input information on our website, the less likely it could be intercepted. We have specifically limited the use of forms and feedback mechanisms on our website, as these create additional data transfer actions that *could be intercepted*.

“Opt-In or Opt-Out”: KSM doesn't ask you to “Opt-In” or to “Opt-Out” of anything. Should we offer something like a newsletter in the future (don't have that now), then you will be able to subscribe to it OR to un-subscribe. Again, we try to keep our website *functional and basic*, which ultimately helps to establish and better maintain the privacy of your personal information.

Social Networking Links: KSM has decided that while the inclusion of social networking links would likely promote a large target audience, it also brings its own brands of potential privacy concerns. We have opted not to include links to any social networking entity.

Website Maintenance and Currency: We review and check the security of our website on a routine (periodic) basis. If we receive notification from Bluehost regarding a change in their website hosting, that will also trigger us to verify the privacy (security) of our website. And of course, if you help us to identify a potential problem, that will also trigger a security check of the website. In terms of privacy, we're *partners* together! We both want the same thing – protection of your personal information and for you to trust, and always enjoy, being involved online with KSM.

Special Requirements for Residents of the European Economic Area and the United Kingdom: KSM is not focused on soliciting, or even involving, anyone from these regions or user groups;

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however, our website is available in all countries and as such, we want to comply with specific privacy policy requirements set forth by law or regulation, as best possible. We will comply with any and all parts that are applicable to the overall design and operations of the KSM website. This is a reminder to anyone reading this privacy policy that we cannot control website access but will always act in good faith in order to comply with all privacy laws and regulations of countries other than the United States.

In addition to the rights outlined above, where GDPR (the General Data Protection Regulation) or the UK GDPR and UK Data Protection Act or related data protection laws apply, the following rights may be available to you:

- **Access:** You have the right to access personal data we hold about you, how we use it, and who we share it with;
- **Correction:** You have the right to correct any personal information held about you that is inaccurate and have incomplete data completed;
- **Erasure:** You have the right to request we erase the personal information we hold about you in certain circumstances (e.g., it is no longer necessary for us to hold that information; you have withdrawn your consent; we are processing the personal information on the basis of our legitimate interest and you object to such processing; or you believe your personal information is being unlawfully processed by us). We will retain the personal data if there are valid grounds under law for us to do so (e.g., for the defense of legal claims or freedom of expression);
- **Restriction of processing to storage only:** In certain circumstances, you have the right to require us to stop processing the personal information we hold about you other than for storage purposes (e.g., for a period of time to determine the accuracy of your personal information or when exercising your right to object; if you require us to retain the personal information for certain purposes such as the defense of legal claims). If we stop processing the personal data, we may use it again if there are valid grounds under law for us to do so; and
- **Objection:** In certain circumstances, you have the right to restrict or object to our processing of your personal information. We may continue to process your personal data if there are valid grounds under law for us to do so (e.g., compelling legitimate grounds or for the defense of legal claims).

Please note that as set out above a number of these rights only apply in certain circumstances, and all of these rights may be limited by law. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal information.

We will respond to requests to exercise these rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances).

Our business endeavors are primarily in the United States, which is where we actively solicit donations and perform other activities with our users. Even though our charitable efforts are

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aimed within Kenya, Africa, we do not solicit there for donors. Our intent is always to *add resources* into the country; not take them from within and redistribute them.

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As a very small nonprofit, *we do not understand how to effectively comply with your laws regarding data privacy*. We ask that you – an individual from these countries - not use our website for any purpose and log out immediately. Should we ascertain through a donation or other means that you are from these countries, we will contact you promptly in order to stop any further interactions using online means. Please consider using international mail to interact with us. Our Post Office Box address is KSM, PO Box 391, Rockvale, TN 37153 USA. Be sure to include your full return address. And our apologies, but we live in a crazy, digital world and we can't ensure compliance with your laws in this area.

We've opted to put together a "Privacy Policy for Residents of California" (KSM-003-OM) separate from this privacy policy so that the specific rules can be more clearly communicated. It will include the above language, and also include the current Addendum for California Users effective as of June 23, 2021. It will be included as part of the "Privacy" web page as shown in Figure 2, below.

Posting: This Policy shall be posted on our website at the bottom of each page displayed in the "footer" section (see graphic for example):



Figure 2 – Example Privacy Policy Link on Each Web Page in Footer Region