

# Dhamma.org Privacy Policy

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Thank you for visiting the Vipassana Meditation Website. Your privacy is important to our organizations. To better protect your privacy, we provide this notice telling you about our information practices and the things you should be aware of about how your information is collected and used both at this site and in general by the many local or regional Vipassana organizations around the world. However, please note that the specific details of the privacy policies of the Vipassana organizations around the world may differ from country to country. A copy of the particular privacy policy applicable to your information may be obtained from the Vipassana course registrar or at the Vipassana course site upon your arrival.

## The Information We Collect

If you choose to register for a Vipassana meditation course via our on-line or conventional registration application, the types of personally identifiable information that may be collected include: name, address, e-mail address, telephone number, fax number, and all the other highly personal information that is called for on the application form and on the course registration form. Your personal information contained in your course application and registration forms are stored in a secure manner within our facilities and the only persons having access thereto are those who have a specific "need to know", such as the course registrar, the center/course manager and the assistant teacher(s) conducting the course(s) to which you seek admission.

If you choose to utilize our "Tell A Friend About Vipassana" service you necessarily submit both yours and another person's e-mail address to send an electronic greeting and the address of our website to that other person. The types of personally identifiable information that may be collected about you by that service is your email address and the types of personally identifiable information that may be collected about the other people at these pages includes the recipient's email address. We also may collect certain non-personally identifiable information when you visit our website pages such as the type of browser you are using (e.g., Firefox, Netscape, Opera or Internet Explorer), the type of operating system you are using, (e.g., Windows, Mac OS or Linux) and the domain name of your Internet service provider (e.g., America Online, Earthlink).

## How We Use Your Information

We use the information you provide about yourself in your application and registration forms to enable the local or regional Vipassana organization to which you have applied to evaluate your application for admission to a course and to register you for that course. In addition, we have found that people who attend a Vipassana course frequently attend subsequent courses over their lifetime. In order to facilitate subsequent attendance at courses and to maintain a record of a student's history and experience the local or regional Vipassana organization(s) may maintain the course data of each student indefinitely in the absence of a legal prohibition to do so in certain jurisdictions. In some cases, the local or regional Vipassana organization may use your name postal address and/or email address to send you information about Vipassana related activities and facilities, if you have not opted-out of such contact. We use the information that you provide about others in our "Tell a Friend" service to enable us to send them your greeting and our website address. We sometimes use the non-personally identifiable information that we collect to improve the design and content of our site and to enable us to understand who is accessing our site from which locations and which files they are accessing within the site, i.e., to use this information in the aggregate to analyze site usage. This Vipassana Website does not ever make your personally identifiable information available to third parties, for commercial or any other reason. However, certain regional Vipassana websites may accept credit card based donations, in which case personal information related to those donation financial transactions is processed in the usual manner. Otherwise, we do not disclose your personal information outside of the facilities of the local or regional Vipassana organizations and their common infrastructure

except when required to do so by law, for example, in response to a court order or subpoena. We may also disclose such information in response to a law enforcement agency's request or other legal requirement.

All teachers and assistant teachers of Vipassana as well as all meditation center staff and Dhamma workers only have access to your information submitted on the course application and registration forms on a "need to know" basis. Through confidentiality agreements and other documentation, we take all reasonable steps to ensure that such information is maintained in confidence and safeguarded against disclosure to or access by third parties once it reaches the center or the non-center course registrar to which it is submitted. However, the particular manner in which your information is maintained, stored and used is governed by the particular privacy policy applicable within the country where the particular course for which you are registering is being held. The only risk of inadvertent disclosure of your information can be in the case of applications submitted by email and that is while the information is being sent over the open internet, as under some circumstances our email application facilities are not secure. Please do not use the email application facility on this website unless you are prepared to personally take this risk.

Our application forms and the personal data contained therein are handled by storage and processing on computers. In addition, the computers of the different Vipassana organizations are located in various countries of the world. Your submission of an application form to attend one of our courses constitutes your unequivocal consent to the storage and processing of your application data on a computer and to the cross-border transfer of your personal information contained in the application form as well as the handling and storage of all information you submit to us in the registration process in accordance with the privacy regulations of the local or regional jurisdiction. In addition, in some cases the email service of a center to which an application is submitted may be provided through Google Apps. As a result the handling of the data in your application to that center is subject to the privacy and security policies of Google, as set forth in their publications that are available on their websites. For the welfare of the students, the local or regional Vipassana organization may consider it necessary to take and retain notes on any health concern or behavior in relation to the course that is inconsistent with the Code of Discipline or that otherwise indicates that a student should be restricted from attending future courses or will need additional support during a future course. In the rare event of this occurring, it is our understanding that the local or regional Vipassana organization will ensure that such notes will be entered on a computer and shared in confidence with assistant teachers and authorized course registrars involved in future courses. Your attendance at a course will constitute unequivocal consent to the handling and storage of such notes and the cross-border transfer thereof subject to applicable laws, including those discussed below ("Specific Privacy Requirements"). Should you wish to know more about how such notes are retained you should contact the local or regional Vipassana organization to determine what its privacy policies are concerning such notes and other personal data.

## **Collection of Information by Third-Party Sites**

This Privacy Policy only addresses the use and dissemination of information that we collect from you. Our website may contain links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties. Since the various Vipassana organizations do not control the privacy policies of third parties, you are subject to the privacy customs and policies, if any, of that third party, and the vipassana organizations shall not be responsible for the use or dissemination of your personal information by that third party. Therefore, we encourage you to ask questions before you disclose your personal information to others.

## **Cookies**

A "cookie" is a text file containing a small amount of information which our server downloads to your personal computer when you visit our website. The file contains a unique number so that our server knows which PC it is talking to. We create a session cookie when you use our online application form to register for a course. We also use a session cookie to know whether you have logged in as an old student or not. Some cookies are allocated to your PC only for the duration of your visit to a website, and these are called session based cookies. These are automatically deleted when you close down your browser. Some other "regional" Vipassana websites may also use cookies.

## **Children's Privacy**

In accordance with the U.S. Children's Online Privacy Protection Act of 1998 (and comparable legislation of other countries, including GDPR), we will never knowingly request or solicit personally identifiable information from anyone under the age of 13 without verifiable parental consent. In the event we receive actual knowledge that we have collected such personal information without the requisite and verifiable parental consent, we will delete that information from our database as quickly as is practical.

## **Specific Privacy Requirements**

Please note that individual countries may have particular privacy law requirements. Vipassana organizations around the world have developed specific privacy policies to comply with these requirements that may differ in specific details from the more general policies set forth above. You may obtain a hard copy of these specific requirements by contacting the course registrar of the center to which you have submitted your application and/or registration forms or at the course site upon your arrival. Dhamma.org is committed to protecting the "rights and freedoms" of individuals whose information Dhamma.org collects in accordance with such laws including but not limited to the General Data Protection Regulation (GDPR).

Pursuant to the applicable privacy regulations, you may have the following rights, among others, with regard to any data we collect or retain that relates to you:

- the right of access, i.e. the right to obtain confirmation as to whether or not personal data is being processed, and where this is the case, to obtain access thereto;
- the right to rectification and erasure, i.e. the right to have inaccurate data rectified and/or to have incomplete data completed, and the right to have personal data erased for legitimate reasons;
- the right to impose restrictions on the processing of personal data, i.e. the right to request the suspension of data processing for legitimate reasons;
- the right to data portability, i.e. the right to receive the data in a structured, commonly-used and easily readable format, as well as the right to transmit the data to another data controller
- the right to object, i.e. the right to oppose the processing of data where legitimate reasons for this exist, including data processed for marketing and profiling purposes, if this is envisaged;
- the right to contact the competent data protection authority in case of unlawful data processing.

You may exercise the rights listed above by writing to dhamma.org at [privacy@dhamma.org](mailto:privacy@dhamma.org). In addition to the foregoing rights, each application form to register for a Vipassana Meditation course or related activity contains a series of disclosures and consents, which are also intended to protect your rights.

## **Opt-Out/Opt-In**

Local or regional Vipassana organizations may provide you with the opportunity to "opt-out" of having them send you e-mail or postal mail about their services or other information related to Vipassana. In other cases, it may be possible for you to "opt-in" to certain local or regional information distribution lists. If you choose to have your name, email address or other personally identifiable information removed from any of those databases, you can do so by contacting your local or regional Vipassana organization and request removal.

## **How to Contact Us**

If you have any questions or concerns about the privacy or any other policies of the Vipassana Website or its implementation you may contact us at: [privacy@dhamma.org](mailto:privacy@dhamma.org).

## **Effective Date**

This Privacy Policy is effective as of May 25, 2018. We reserve the right to modify the terms of this policy at any time and in our sole discretion. Your use of this website constitutes a binding acceptance of the above-referenced policies.