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## PRIVACY POLICY

This privacy policy applies to both [www.cdsintl.org](http://www.cdsintl.org) and [www.cdsinternational.org](http://www.cdsinternational.org).

CDS International, Inc., 440 Park Avenue South, 2nd Floor, New York, NY 10016 (“CDS”), operates this website. CDS knows that you care how information about you is used and shared. We respect your privacy, and we appreciate your trust. This is our privacy policy; by visiting this website, you accept the practices and procedures described in it. You should carefully review this privacy policy before using this website.

### 1. PERSONAL INFORMATION

For the purposes of this privacy policy, “Personal Information” is personally identifiable information about an individual, as more particularly described under applicable privacy laws. Personal Information that we collect may include, without limitation: (a) your name; (b) your mailing address; (c) your email address; (d) your telephone number; (e) your sex; (f) your date of birth; (g) your country of citizenship; (h) your country of residency; (i) your country of birth; (j) the names, sex and dates of birth of any dependents; (k) your occupation; (l) your educational history; (m) the anticipated amount of personal funds available to you during the course of an internship; and (n) proof of insurance.. If you are given the option to have information password protected, that password will also be part of your Personal Information.

### 2. POLICY SCOPE AND PURPOSE

This privacy policy applies to your use of this website and our treatment of Personal Information collected through it by or on behalf of us. The information that we receive from visitors helps us improve the website and the services that we provide. Your use of other websites may be subject to different or additional privacy policies posted on linked or associated websites, or websites to which you may be directed; those privacy policies shall control as to your use of those websites. If you are linked or redirected to any website of a party affiliated with CDS during your visit to this website, the privacy policy of that affiliate’s website shall apply as to your visit to that website, to the exclusion of this privacy policy. For information regarding the collection and use of information on any of those websites or other third-party sites, please refer to the terms of use and privacy policies provided by those websites. Your participation in any survey, marketing or promotional program made available through this website may be subject to additional privacy considerations, as well as other terms specifically related to that program.

### 3. OUR INFORMATION COLLECTION PRACTICES

The types of Personal Information that we receive and use:

#### (a) Information you transmit to us

In addition to information we collect automatically (as described below), we collect, and for a period of time we store, certain information that you send to us via completion of online forms initiated by you while using this website, including Personal Information. It is always your choice whether to provide any such information, but if you do not supply

some items of requested Personal Information, some features or services of this website may not be available to you. If you choose to apply for placement in a professional development internship via CDS, the answers to certain application questions are mandatory and you may not be able to proceed with your application if you choose not to supply the requested information. Other application questions are optional; you may choose to limit certain types of information that you will be requested to provide in answer to them. You may also be asked to respond to additional questions to help us meet your needs, and if you request that materials be sent directly from us or our designee to an individual other than yourself, you will also be asked to submit information about that individual.

By submitting information to us or making any information (relating to you or any other individual) available on the website (including, without limitation, Personal Information), you represent and warrant that (i) you have the necessary approvals and permissions to provide that information, and (ii) the collection, use and disclosure of the information in accordance with this Privacy Policy does not violate any third-party rights.

**(b) Automatically Collected Information**

When you visit this website to register with us (if that option is offered), or simply to browse, read or download information, we utilize software that automatically collects and stores the following types of non-identifiable personal information received from you: (i) information from server logs found on your browser; (ii) click-through statistics; (iii) your IP address and country; (iv) the type of web browser you are using to access this website; (v) the type of operating system you are using; (vi) the name of the domain and host from which you access the Internet; (vii) the date and time you access this website and the duration of your visit; and (viii) the Internet address of the site from which you linked directly to this website. Automatically-collected information of that kind typically provides us with a greater understanding regarding the use of this website, including which pages are the most popular with our visitors. That information also allows us to determine if this website is working properly and to make changes to this website that allows users to have better experiences on this website. We collect that information and track it for statistical purposes; we do not use it to identify or to market to a particular user.

Non-identifiable personal information is automatically collected and stored by one or more third-party providers. Storage, maintenance, and preservation of that information may be governed in whole or in part by the policies of those providers.

If you wish to prevent the collection of non-identifiable personal information, you can disable JavaScript in your web browser. Disabling JavaScript may affect the functions and display of the website.

**(c) Information from Other Sources**

We might receive information about you from other sources that we believe have rights to provide that information to us, and we may add it to our Personal Information.

#### **4. FINANCIAL INFORMATION**

Except as otherwise set forth in this Privacy Policy, CDS does not collect or receive financial information from visitors to the website or applicants to CDS programs. If you choose to apply for an internship via CDS or make a financial donation to CDS, you will be re-directed to the online payment section of the website and asked to provide certain Personal Information as listed above in Section 1. You will not be

required to provide financial information at that point. Once you have provided the requisite Personal Information, you will be provided with a hyperlink in an email or on our website that will re-direct you to the company that processes payments for us, Evalon, Inc. ([www.evalon.com](http://www.evalon.com)). You will be notified that you are leaving our website, and Evalon will receive all of your payment information and process your payments for us. The storage and protection of your financial information, including, but not limited to, bank account and credit card numbers, is governed and defined by the privacy policy of Evalon and CDS takes no responsibility for same.

#### **5. IF YOU DON'T PROVIDE PERSONAL INFORMATION**

You can use this website without providing any Personal Information. However, in order to take advantage of the full capabilities of this website and to obtain access to, and use of, many of the features found on this website, including applying for internships, you must provide certain Personal Information. You will be ineligible to receive certain services if you do not provide Personal Information.

#### **6. CHOICES REGARDING YOUR DISCLOSURE OF PERSONAL INFORMATION**

You are not required to provide us with any Personal Information we request. If you do provide Personal Information through this website or otherwise, including Personal Information regarding individuals other than yourself, we will assume that you have the authority to provide that Personal Information, that you have provided that Personal Information voluntarily, and that you consent to the use of that Personal Information in the manner envisioned by this privacy policy.

#### **7. USE AND DISCLOSURE OF PERSONAL INFORMATION**

We gather Personal Information from you for the express purpose of administering a CDS program. When you complete an application, your electronic signature represents an agreement to the terms of the application and allows us to share your Personal Information with specific third parties who are identified in your application.

To administer a CDS program to which you apply and for which you have provided Personal Information, we may also disclose any and all of your Personal Information to certain other third parties who are the hosts of our professional development internships. Our business requires us continually to develop new relationships in the expansion of our programs, and we expect that the number of third parties with whom we cooperate will expand in the future.

We also maintain a service that will permit third parties (including those listed above) as well as companies hosting interns to track the status of your application and the Personal Information disclosed in it. Those third parties are granted password-protected access to our secure database.

We will never sell, rent, license or trade your Personal Information, and we do not otherwise exchange Personal Information gathered on this website to any third parties, except as provided above. We may aggregate and use certain non-personally identifiable information and may share that information and statistical information derived from it with our marketing partners, advertisers or other third parties for research or marketing purposes. In addition, we may share Personal Information from this website with CDS affiliates in those instances in which the person providing the information: (a) has made a request for information, complaints or comments, or (b) has asked that the Personal Information be so shared. For example, if you order information from us via this website, we may share your Personal Information with an affiliate that fulfills the request.

#### **8. BUSINESS USES OF INFORMATION**

CDS uses or may later elect to use Personal Information you provide to us: (a) for login and marketing purposes; (b) to provide the products or services that you have ordered or requested; (c) to allow you to participate in surveys and promotions; (d) to provide customer service and respond to your requests and

inquiries; (e) to protect both you and us against error and fraud; (f) to send information and product and service alerts; and (g) to record usage of this website. We may use your Personal Information to customize advertising and marketing information regarding our products and services, to contact you regarding our products and services, to enhance product and service offerings, and to fulfill requests. You may also be asked whether you wish to receive information from third parties; upon your consent, CDS or those third parties may use your Personal Information to contact you. If you consent to be contacted by CDS or third parties, you may choose to 'opt-out' of further communication and discontinue receipt of marketing emails at any time.

## **9. SERVICE PROVIDERS AND VENDORS**

We may also share your Personal Information with certain third parties that perform services for us. Those third parties may host this website, operate certain features on this website, receive and process Personal Information via server logs, print or send mailings, authorize and process your payments, provide customer service, analyze data and assist in fulfilling your orders, send emails on our behalf, or otherwise assist us with the operation of this website. Those third parties are not authorized to use or disclose your Personal Information for any purpose other than to perform the services designated by us.

## **10. SHARING OF PERSONAL INFORMATION**

We may share your Personal Information among our affiliates. They may use your Personal Information to offer products and services to you consistent with the purposes identified in this privacy policy, including the marketing of CDS products and services. Your Personal Information may also be transferred as an asset in connection with a merger or sale involving all or part of CDS or as part of a corporate reorganization, stock sale or other change of control. CDS may also provide your Personal Information to a third party if CDS is required by law so to disclose your Personal Information. For example, CDS may be required to disclose your Personal Information to respond to a subpoena, court order or other legal process. We may also disclose Personal Information in response to a law-enforcement agency's request, or where we believe it is necessary to investigate or address unlawful acts or acts that may endanger the health or safety of a consumer or the general public, to verify or enforce compliance with the terms of use and policies that govern this website, or as otherwise required or permitted by law. We may share non-personally identifiable information with third parties, including, without limitation, our affiliates and subsidiaries, without restriction.

## **11. CONSENT TO PROCESSING AND TRANSFERS OF INFORMATION**

As part of its business operations, CDS may transfer information that you send to us, including, without limitation, Personal Information, to recipients in countries that do not provide the level of legal data protection common to CDS' territory of organization. By using this website, you consent to those transfers and to the processing by CDS of that information.

## **12. NOTICE FOR PARENTS AND GUARDIANS**

This website is considered to be a general audience site and is not intended for use by children. We offer our services and our website for use by adults. CDS does not sell products or offer services that are intended for purchase by children and does not intend to collect Personal Information from individuals under the age of thirteen. If you are the parent or guardian of a child who has provided Personal Information to us, please inform us as provided under Section 15 ("Managing Your Information"), and we will delete that Personal Information.

We do not collect any information on children. If you are a parent or guardian who wishes to participate in a CDS internship program and you plan to have your children accompany you on your internship, you may be required to submit information about your children that will allow us to apply for a J-2 (companion) visa for your children. You may be required to complete a handwritten information sheet

about your children after you have completed the initial electronic application stages. We will then upload and store that information electronically in our secure database.

### **13. USE OF COOKIES AND SERVER LOGS**

Cookies are pieces of information that a website transfers to an individual's hard drive to identify previous visitors to the site. Cookies and related technologies may involve the transmission of information regarding your access to, and use of, this website either directly to us or to another party authorized by us to collect information on our behalf. We may use cookies to store information about your visit to this website in order to enhance your experience. We may also use cookies and tracking technologies to: (a) track user visits, including individual page visits; and (b) save your password so you do not have to provide it each time you visit this website (if we should ever ask you to create a password). The information we gather automatically through cookies, web beacons and related technologies may include, but is not limited to, records from server logs found on your browser, your IP address, the type of web browser you are using to access the website, the type of operating system you are using, the name of the domain and host from which you access the Internet, the date and time you access the website, and the Internet address of the site from which you have linked directly to the website. Cookies are text files that can be rejected, disabled, or deleted by you at any time. You may be able to disable or delete cookies using your Internet browser settings. However, by disabling, deleting, or rejecting cookies, you may potentially inhibit part of the user experience on this website and other websites. Server logs are digital files that automatically record activity on a server. CDS uses server logs to track usage of this website. Those server logs are used by a third-party provider to collect information on behalf of CDS; even if any such information should not qualify as Personal Information under applicable privacy laws, the collected information could potentially be used to understand more about you and your use of this website.

### **14. SECURITY**

The security and confidentiality of your information is very important to CDS. We do not share with third parties any personally identifiable information you provide in connection with your use of the website, except with your consent or as described in this privacy policy. CDS, its affiliates and authorized third parties employ reasonable measures, including administrative, technical, and physical measures, to protect your Personal Information from unauthorized access, loss, alteration, use, or disclosure. We use reasonable measures to limit the disclosure of your Personal Information only to certain staff within CDS, its affiliates and third parties providing services on our behalf, and to require that they process the data only for the purposes identified in this privacy policy. We store your Personal Information in an off-site data center; all passwords for entry into the data center are stored in encrypted format; the data center is constantly monitored for unauthorized connection via unknown IP addresses; the data center receives regular security updates and patches; the data center is protected by a firewall to prevent unauthorized traffic; and all data transmitted either to or from the data center is encrypted using 128-bit SSL.

However, your Personal Information can never be entirely secure. As with other types of information, it may be transmitted over networks without appropriate security measures and may potentially be accessed, deleted, altered, used or disclosed by unauthorized persons. You can help us to protect your Personal Information by: (a) using a secure web browser; (b) not sharing your password with others; and (c) changing your password frequently (if we should ever ask you to create a password).

### **15. MANAGING YOUR INFORMATION**

At any time, you are entitled to request access to, and make corrections to, your Personal Information we have collected via this website. If you apply to a CDS program, you will be able to update, change, or delete Personal Information. Once you have submitted your application, you will no longer have access to the Personal Information. If you no longer wish for us to process your Personal Information in

accordance with your application, you may contact CDS using the information that you received during the application process or via Section 18 (“Contact Us”) and request that CDS remove your Personal Information from our database. Please note that modification of your application status will not stop marketing or advertising content that is ready to be mailed or is queued for transmission to you prior to the time when we can remove your Personal Information or modify your “opt-in” status.

CDS reserves the right to retain any Personal Information reasonably necessary to appropriately document its business activities and for archival and record retention purposes. We will store your Personal Information for as long as reasonably necessary for the purposes described in this privacy policy and as required by applicable law. You may make inquiries about this privacy policy under Section 18 (“Contact Us”).

## **16. MANAGING PREFERENCES**

When you ask us to do so by contacting us as provided in Section 18 (“Contact Us”), you will have an opportunity to opt out of receiving information from us that you might earlier have requested or agreed to receive.

However, during the pendency of your application to a CDS program and also during the course of any internship in which you may participate, you may not opt out of communication with CDS.

Once you have completed a CDS program, you will be considered part of our ‘alumni’ and you will regularly receive ‘alumni’ emails from CDS. You may opt-out of receiving further emails by clicking a link at the bottom of any ‘alumni’ email that you receive. Once you have opted-out from CDS ‘alumni’ emails, new emails cannot be sent to your email address.

## **17. UPDATES AND CHANGES**

We may change this privacy policy from time to time by posting updated versions of the privacy policy on this website. If we make changes to this privacy policy, we may post a notice on this website, but it may only be up for a limited period of time. By continuing to use this website, you agree to the terms contained in this privacy policy and any updates; it is your obligation to review this privacy policy from time to time and to review updates that are posted on this website. The version of this privacy policy that shall be deemed effective as of any given date and time shall be solely the version that shall be posted on that date and at that time. The information we collect on this website will be treated in accordance with the privacy policy as in effect at the time the information is collected.

## **18. CONTACT US**

If you have questions regarding your privacy on this website, you may email us at [privacy@cdsintl.org](mailto:privacy@cdsintl.org). To contact us to opt-in or opt-out of receiving information from us, as set forth in Section 15 (“Managing Your Information”), please email us at [privacy@cdsintl.org](mailto:privacy@cdsintl.org).

***Last Updated: April 8, 2010.***

## **CALIFORNIA PRIVACY RIGHTS**

Under California law, if you are a California resident, you have the right to request that we do not share your Personal information with third parties for use in direct marketing by them to you. To make such a request, please write us at [privacy@cdsintl.org](mailto:privacy@cdsintl.org).