

Privacy Policy

Effective Date: April 1, 2020

This Privacy Policy describes the information that Sephardic Community Alliance and its subsidiaries and affiliates (“we,” “our” or “us”) collect through the www.scaupdates.org and scatorah.org websites and apps (each and collectively, the “Site”) and how we use it, how we protect it and the choices you can make about your information. Throughout this Privacy Policy “information” includes personal information about you.

By accessing a Site, you expressly consent to the collection, use, disclosure and storage of your information and other information received by us as a result of such use in accordance with this Privacy Policy or the Terms of Use (the “Terms”). If you do not agree with the terms of this Privacy Policy or the Terms, you should immediately stop using or visiting the Site.

CONSENT:

If you are located outside of the United States, please note that a Site is hosted in the United States. Therefore, your information, including any personal information provided pursuant to a Site may be processed and stored in the United States. As a result, United States federal and state governments, courts or law enforcement or regulatory agencies may be able to obtain disclosure of your information through laws applicable in the United States. Your use of the Site or your submission of any information to us will constitute your consent to the transfer of your information outside of your home country, which may result in different data protection rules than in your country. Please contact us at info@scaupdates.org if you have any questions about how your information may be processed or stored in the United States.

Who is Responsible for the Processing of Your Personal Data?

Sephardic Community Alliance and its subsidiaries and affiliates (referred to us as “we,” “our” or “us” in this policy).

Information We Collect

We collect the following types of information in the manner described below.

1. You may voluntarily provide us with information, including:
 - Your name, postal address, country, email address, telephone number, user name, user ID, password, credit card numbers and information and other payment information and other information to use a Site;
 - Information when you contact or interact with us (for example, regarding support opportunities); and
 - Any other information you voluntarily provide us with including your comments and other content in connection with using the Site.
2. Any information we may receive through a third-party social networking service may be used as described in this Privacy Policy.
3. We may automatically collect other information about you, including:
 - Web browser type;

- Your Internet Protocol (IP) address;
 - Domain name of your Internet service provider;
 - Your geographic location;
 - The Site pages that you visit and the time of your visits; and
 - Aggregated information that cannot be used to specifically identify you when you use or visit the Site.
4. We may collect information about you from publicly available sources.
 5. We may combine any of the information we collect from or about you and use it in the manner described in this Privacy Policy.

How We Use Your Information

We use the information that we collect for the following purposes, including:

- The purposes for which you provided it;
- For fulfillment of requests;
- To identify you as a user of a Site;
- To send you information about your relationship with us;
- Where permitted by applicable law, to contact you with information, including promotional information, contests and surveys, that we believe will be of interest to you (unless you have opted out);
- To process and respond to your inquiries (for example, regarding support or other requests);
- To create anonymous data, which we may use for any purpose;
- To compile aggregate data for internal and external business purposes;
- To generate and review reports and data about our user base and service usage patterns;
- To analyze the accuracy, effectiveness, usability or popularity of a Site;
- To improve the content and features of a Site;
- To prevent fraudulent transactions, monitor against theft and otherwise protect our users and our business;
- To administer and troubleshoot a Site; and
- As otherwise stated in this Privacy Policy and the Terms.

For those customers located in the European Economic Area, we are required to set out in this Privacy Policy the legal grounds on which we rely in order to process your personal information. Our use of your personal information is permitted by law because:

- it is necessary for taking steps to enter into a contract with you for carrying out our obligations under such a contract. Where we need your personal information in order to fulfill our contract with you, if you do not provide it, provide it inaccurately or require us to delete it, then we may not be able to provide you with the product or service that you have requested from us;
- it is necessary for our legitimate interests, including to provide and improve services, personalize the services to your shopping habits and to protect the security of the Sites. In such cases, we have taken measures to ensure that this processing does not cause unwarranted prejudice to your privacy;
- it is required to satisfy any legal or regulatory obligations that we are subject to; and
- in limited circumstances and if required by applicable law, you have agreed to us processing your personal information.

We retain your information for as long as necessary to fulfill the purposes for which we collect it, except if required otherwise by law.

How Your Information is Disclosed

Information may be disclosed to third parties in accordance with our Privacy Policy. Please note that a user may choose not to share certain information as described in “Your Choices Regarding Your Information” below.

1. Third Parties. We may use third parties to perform functions in connection with a Site. We may share information about you that they need to perform their functions and in accordance with our agreements with them.
2. Third Parties for Their Promotional Purposes. Where permitted by applicable law, we may share your information with third parties for their promotional purposes. Please see Your European Privacy Rights and Your California Privacy Rights below.
3. Business Changes. If we become involved in a merger, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution, or other transaction or if the ownership of all or substantially all of our business otherwise changes, we may share or transfer your information to a third party or parties in connection therewith.
4. Subsidiaries and Affiliates. We may also share your information with any subsidiary or affiliate of ours for purposes consistent with this Privacy Policy. Any subsidiary or affiliate of ours will be required to maintain that information in accordance with this Privacy Policy.
5. Investigations and Law. Regardless of the choices you make regarding your information (as described below) and to the extent permitted by applicable law, we may disclose information about you to third parties to:
 - Enforce or apply the Terms;
 - Comply with law, in response to subpoenas, warrants, or court orders, or in connection with any legal process or cooperate with government or law enforcement officials or private parties;

- Protect our rights, reputation, safety and property, or that of our users or others;
 - Protect against legal liability;
 - Establish or exercise our rights to defend against legal claims; or
 - To investigate, prevent or take action regarding suspected illegal activities, suspected fraud, the rights, reputation, safety or property of us, users or others, violation of our Terms, policies or agreements or as otherwise required by law.
6. Aggregated Anonymous Information. We may share aggregated anonymous information relating to visitors to and users of a Site with affiliated or unaffiliated third parties.
 7. With Your Consent. We may use your information for any other purpose for which you consent.
 8. Cookies; Web Beacons; Do Not Track. Please see Cookies; Web Beacons; Do Not Track below.

Cookies; Web Beacons; Do Not Track

1. Cookies. We, along with third parties, use cookies.

Cookies are small bits of information that are transferred to and stored in separate files within your computer's browser.

- Persistent cookies remain on the visitor's computer after the browser has been closed.
- Session cookies exist only during a visitor's online session and disappear from the visitor's computer when they close the browser software.

You can instruct your browser to stop accepting cookies. But if you do not accept cookies, you may not be able to use all portions or all functionality of a Site.

Flash cookies, also known as local shared objects, also may be used.

2. Web Beacons. Web beacons are small strings of code that provide a method for delivering a graphic image on a Web page or in an email message for the purpose of transferring data. You can disable the ability of Web beacons to capture information by blocking cookies.

Third parties may collect personally identifiable information about an individual user's online activities over time and across different websites when a user uses a Site.

3. Do Not Track. At this time, we do not respond to "Do Not Track" signals sent from Web browsers.

Security

While we take reasonable administrative, physical and technical measures to protect the information you submit via a Site against loss, theft and unauthorized use, disclosure, or modification, we cannot guarantee its absolute security. No Internet or email transmission is ever fully secure or error free. Email sent to or from a Site may not be secure. You should use caution whenever submitting information online and take special care in deciding what information you send to us via email.

Links to Other Websites

This Privacy Policy applies only to the Site. The Site may contain links to other websites to which this Privacy Policy does not apply. The links from the Site do not imply that we endorse or have reviewed these websites. The policies and procedures we describe here do not apply to these websites. We neither can control nor are responsible for the privacy practices or content of these websites. We suggest contacting these websites directly for information on their privacy policies.

Your Choices Regarding Your Information

You have choices regarding the use of information on a Site.

1. Changing Your Information. You may access and make changes to your information, including keeping your information accurate or deleting your information, by contacting us at info@scaupdates.org.
2. Cookies; Web Beacons; Do Not Track. Please see Cookies; Web Beacons; Do Not Track above.
3. Social Networking. You should make sure you are comfortable with the information that a third-party social networking service may make available to us by carefully reviewing the service's privacy policy and terms and conditions and by modifying your privacy settings directly on that service.

Children

We do not knowingly collect personal information from individuals under age 18. If you are under the age of 18, please do not submit any personal information through a Site. If you have reason to believe that we may have accidentally received personal information from an individual under age 18, please contact us immediately at info@scaupdates.org.

Your European Privacy Rights

For customers located within the European Economic Area, you have various additional rights under local law to those set out above in relation to your personal information, such as to:

- request a copy of the personal information we hold about you;
- ask that we correct or remove information you think is inaccurate or incomplete;
- ask that we delete the personal information that we hold about you, or restrict the way in which we use such personal information;
- withdraw consent to our processing of your personal information (to the extent such processing is based on consent);
- object to our processing of your personal information (including for direct marketing purposes); and
- receive your personal information in a structured and commonly used format so that it can be transferred to another data controller ('data portability').

If you would like to exercise these rights or understand if they apply to you, please contact us using the details set out in How To Contact Us below.

Except as described in this policy or provided under data protection laws, there is no charge for the exercise of these rights. However, if your requests are manifestly unfounded or excessive, in particular because of their

repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

Your California Privacy Rights

If you reside in California, please read this section for additional disclosures about how we collect, use and disclosure information about you and your rights under the California Consumer Privacy Act (or “CCPA”) (California Civil Code Section 1798.100 et. seq.)

Additional Disclosures Related to the Collection, Use, Disclosure, and Sale of Personal Information

- **Categories of Personal Information Collected:** Within the previous 12 months, we have collected the following categories of personal information: identifiers, commercial information, characteristics of protected classifications under California or U.S. law, geolocation data, Internet or other electronic network activity information, audio, electronic, visual or similar information, and inferences drawn about any of the preceding categories of information. For examples of the data points we collect, please see “Information We Collect” above.
- **Business or Commercial Purpose for Collecting and Selling Information:** We collect personal information for the business and commercial purposes described in “Information We Collect” above.
- **Categories of Sources of Personal Information:** We collect personal information from and about you as described in “Information We Collect” above.
- **Categories of Third Parties with Whom We Share Information:** We may share your personal information with third parties as described in “Information We Collect” above.
- **Categories of Personal Information Disclosed:** Within the preceding 12 months, we have disclosed the following categories of personal information for business or commercial purposes: identifiers, commercial information, characteristics of protected classifications under California or U.S. law, geolocation data, Internet or other electronic network activity information, audio, electronic, visual or similar information, and inferences drawn about any of the preceding categories of information.
- **Sale of Personal Information:** California law requires that we provide transparency about personal information we “sell” which, for the purposes of the CCPA, means scenarios in which we have shared personal information with partners or third parties in exchange for valuable consideration. We do not sell identifying information about you, such as your name, email address, phone number, or postal address.

Your Consumer Rights

The CCPA grants residents of California certain rights in relation to their personal information. If you are a California consumer, you have the following rights:

- **Access:** California consumers have the right to request access to the specific pieces of personal information we have collected about them in the last 12 months. They may also request the categories of personal information we have collected about them, the categories of sources of such collection, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom we share and sell their personal information, the categories of personal information we have disclosed and sold about them in the preceding 12 months, and the categories of third parties to whom we sold personal information in the preceding 12 months.

- **Deletion:** California consumers have the right to request deletion of their personal information (subject to certain exceptions).
- **Opt Out of Sale:** California consumers have the right to opt out of the sale of their personal information. As described above, we may sell personal information for the commercial purposes of advertising. California consumers above the age of 16 have the right to opt out of these sales at any time. We do not knowingly collect online or sell personal information about consumers under the age of 13.
- **Nondiscrimination:** California consumers have the right to receive equal service and price and not be discriminated against even if they exercise any of their other CCPA rights, however, financial incentive programs may condition participation on collection of personal information.

If you are a California resident, you may exercise your rights under the CCPA by visiting our request form [here](#).

When you exercise your rights, to confirm your request and ensure we respect your privacy and security, we will prompt you to verify your identify by confirming your name, e-mail address, or phone number (or other identifiable information).

Changes to Privacy Policy

Please remember that this Privacy Policy is a notice to you and not a contract between us. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. If we materially change the way in which we process your information, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. Please review this Privacy Policy periodically, and especially before you provide any information. This Privacy Policy was made effective on the date indicated above.

How to Contact Us

We welcome questions, comments and concerns about our Privacy Policy. If you wish to provide feedback or if you have questions or concerns, or wish to exercise your rights related to your personal data, please send us an email to info@scaupdates.org.