



PLUS ONE NETWORK PRIVACY POLICY

Last updated: June 16, 2022

Five Colleges, Incorporated ("FCI," "we" or "us") respects the privacy of those who use the five-colleges.us.hivebrite.com Platform and is particularly aware and respectful of its Users' privacy and personal data protection.

This Privacy Policy (the "Privacy Policy" or "Policy") describes how FCI treats information collected or made available through the Platform, and does not apply to any other information or privacy practices of Five Colleges, Incorporated.

This Policy and agreement explain how, with your permission, Five Colleges, Incorporated collects, uses, and treats information that we receive from you through the Plus One Network. Using a solution called "Hivebrite", which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds, FCI offers the Plus One Network (hereafter, the "**Platform**"). This Platform is for the benefit of educational institutions to its Users who have subscribed on the Platform and as such have a User account (hereafter, the "**Users**"). The Platform is intended to foster communication among those who work at, are considering employment at, or are the spouse/partner of current or prospective employees at educational institutions. It is a resource and forum for members of these communities to exchange information of interest to them. The Platform is available at: five-colleges.us.hivebrite.com.

The terms "you" and "your" refer to any person providing Personal Data (as that term is defined below) through the Platform. This Privacy Policy does not cover Personal Data that you provide to us through other means, such as through telephone calls.

By using the Platform, you consent to FCI's collection and use of information about you in accordance with this Policy. This Policy is part of the [Terms](#) that govern your use of the Platform, so please read the entire [Terms](#). If you do not accept the Privacy Policy, please do not use the Platform. FCI reserves the right to change this Privacy Policy in its sole discretion and will post any changes on the Platform. Any modifications are effective immediately upon posting. By continuing to use the Platform after FCI posts a modified Privacy Policy, you consent to the Policy as modified.

Personal Data

FCI collects personally identifiable information about you (“Personal Data”), through the Platform. Personal Data means information about you that would allow us (or others) to identify you including, but not limited to, your name, gender, birth date, ethnicity, address, telephone number, e-mail address and other similar information.

Subscribing on the Platform

When subscribing to the Platform, the User is informed that their Personal Data is collected for the purpose of creating a User account.

Mandatory data:

- First name
- Last name
- Email address
- Primary role
- Affiliated institution
- Name of employee at affiliated institution

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

Optional data:

- Your CV/resume and information regarding your education and experience
- Location
- Other data

Use of the Platform

The User may validly publish, at their own initiative, content on the Platform, such as:

- Posts
- Events
- Opportunities

The User is aware that when using the Platform, the User may decide to provide sensitive data, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

Purpose of Data Processing

FCI processes Personal Data that are freely transferred by the User when accessing the services proposed by the Platform for the following purposes:

- Creation and management of a User account;
- Providing the User with all functionalities of the Platform, meaning:
 - Sending invitations for events, if the User has accepted to receive such invitations
 - Sending offers (e.g., jobs announcements) if the User has accepted to receive such offers

- Invite the User to events organized by the Platform
- Storage of User Personal Data
- Management of transactions through the Platform
- Management of prospect communications:
 - Sending email prospect campaigns in the name of Plus One Network and/or its partners
 - Sending newsletters in the name of Plus One Network and/or its partners
- Collecting statistics:
 - regarding the effective use of the Platform
 - regarding the different levels of activity on the Platform
 - to improve the quality of the services proposed by the Platform
 - to improve the usage functionalities of the Platform
- Enable the synchronization of the User's LinkedIn profile

Data Retention

User's Personal Data related to the User Account is retained only during the length of the User's subscription on the Platform.

Principles

FCI commits to respecting the following principles when processing User's Personal Data:

- Process User's Personal Data lawfully, fairly, and in a transparent manner;
- Only collect and process the User's data for the purpose as described in the present Privacy Policy;
- Ensure that the Personal Data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Make the best efforts to ensure that the Personal Data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep User's Personal Data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability, and the resilience of the process systems and services;
- Limit the access to the User's data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under [201 CMR 17.00 Standards for the Protection of Personal Information of Massachusetts Residents](#) in relation to the processing of their data.

Withdrawal of Consent

The User may withdraw consent at any time, without affecting the lawfulness of the processing based on consent before withdrawal.

The User can withdraw consent by requesting deletion of their account and sending an email to: fc-plusonenetwork@fivecolleges.edu or postal mail to: Five Colleges, Incorporated, 97 Spring Street, Amherst, MA 01002, provided that the User justifies their identity.

Cookies

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the [Cookie Policy](#).

Authorized Persons

Only authorized persons working for FCI can access your Personal Data. FCI makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's Personal Data.

We use trusted service providers to carry out a set of operations on our behalf for hosting and other services, such as payment processing. We may also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

We provide service providers only with the information they need to perform the service and ask them not to use your Personal Data for any other purpose. We do our best to ensure that all these trusted service providers only process the Personal Data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

FCI may be required to disclose or share your Personal Data to comply with a legal obligation.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 44 rue la fayette 75009 Paris France	HIVEBRITE solution	https://hivebrite.com/privacy-policy
Paypal 21 rue Banque 75002 Paris France	Payment Service	https://www.paypal.com/us/webapps/mpp/ua/privacy-full
Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups	https://cloud.google.com/security/privacy/
Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg		https://aws.amazon.com/compliance/gdpr-center/

Sentry 132 Hawthorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code	https://sentry.io/privacy/
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform	https://api.sendgrid.com/privacy.html
Hivebrite, Inc. 16 Nassau St, New York, NY 10038, USA	Customer support for the Platform	https://hivebrite.com/privacy-policy