World Justice Project Privacy Policy

WEBSITE PRIVACY POLICY

Last updated: March 4, 2021

1. INTRODUCTION

The World Justice Project, a Washington non-profit corporation ("WJP") respects your privacy and we are committed to protecting it through our compliance with this privacy policy (the "Privacy Policy"). The terms "we", "us" and "our" refer to WJP. The term "you" refers to the person visiting the website www.worldjusticeproject.org (the "Website"). Capitalized terms not defined herein, shall have the meaning ascribed to them in the Terms of Use.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Website and our practices for collecting, using, maintaining and organizing, protecting, deleting and disclosing that information (collectively, "process" information). Some of this information may be considered "personal information" or "personal data" under applicable law, which is information that is about any individual, or from which any individual is identifiable ("personal information").

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy.

2. PERSONS UNDER THE AGE OF 13

2.1 Minimum Age

Our Website is not intended for persons under 13 years of age. You must be at least 18 years of age, or between 13 and 18 years of age with parental consent, to use the Service according to our Terms of Use. No one under age 13, or under age 18 without parental consent, may provide any information to or on the Website. We do not knowingly collect personal information from persons under 13. If you are under 13, or under 18 without parental consent, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a person under 13, or any unauthorized minor under 18 years of age, we will delete that information. If you believe we might have any information from or about a person under 13, please contact us at wip@worldjusticeproject.org.

2.2 Note to Parents and Guardians

Because it is difficult for us to verify a person's age online, it is entirely YOUR responsibility to supervise your child's online activities at all times. Parental control tools like filtering software and hardware are commercially available to help you limit a child's access to potentially harmful material

on the Internet. If you discover that your child or minor has obtained an account on the Service without your approval, please contact us immediately via email at wjp@worldjusticeproject.org so that we can promptly obtain parental consent or remove the child's personal information from the Service.

3. TYPE OF INFORMATION WE COLLECT, PURPOSE AND LEGAL BASIS

3.1 What Personal Information Do We Collect?

The categories of personal information and sources that we may collect are as follows:

- Personal and contact details: We may collect identity data that you may provide to us, including your full name, email address, organization name, job title, telephone number, country, pictures, videos and audio recordings.
- Device Details: We may collect device type, operating system, browser type, browser settings, IP addresses, unique identifiers (such as VIN, MAC address and IDFA), language settings, dates and times of connection to our website and other technical communication. We may collect this information through use of cookies and other related technologies, as is further described in the "Cookies and Other Related Technologies" in section 9 below.
- Usage Details: We may collect records of your use of our website, including details of content with which you interact, page views, clicked pages or links, your communication preferences. We may collect this information through use of cookies and other related technologies, as is further described in the "Cookies and Other Related Technologies" in section 9 below.
- Payment details: We may collect credit card numbers, cardholder names, card security details, card expiry dates, and billing addresses that you provide to us or our third party payment processors.
- Opinions, views and interests: We may collect comments, ratings, or reviews that you choose to send to us, post via a survey, or publicly post via social media platforms.
- Information collected from Third Parties: We may collect information from public sources, such as your public social media information; we may collect information about you directly from our vendors or our third party processors who collect information on our behalf.
- Job Applicants: If you apply for a job with us, we may collect your name, contact details and other relevant information we request you provide to us, such as your demographics, past employment information, education and state ID.
- Any other information you actively choose to share via our Website, for example through the Community Forum. Please note that any information and content you share through the Community Forum will be publicly available to everyone who visits our website.

3.2 Purpose and Legal Basis

In processing your personal information in connection with the purposes set out in this policy, we rely on one or more of the following legal bases, depending on the circumstances:

- when processing is necessary for the performance of our contract with you or your designee.
- we have obtained your prior express consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary it is not used for processing that is necessary or obligatory in any way);
- in order to comply with applicable law and when necessary for the purposes of our legitimate interests;

- if we have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our organization, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms; or,
- the processing is necessary to protect the vital interests of any individual.

4. HOW WE USE YOUR INFORMATION

We may use, or disclose the personal information we collect for one or more of the following purposes:

- Our website: operating and managing our website; providing content to you; and communicating and interacting with you via our website to support our cause.
- Provision of other services to you: providing our website and other services to you, including
 contacting you to provide information about our cause other purposes for which you provided
 us the information; improving and personalizing our content, offerings services; providing you
 with support and respond to your inquires; inviting and registering people to rule of lawrelated events and conferences; administering various surveys; inviting organizations to join
 our network of rule of law practitioners; administering various rule of law-related
 competitions and grant proposals; and distributing press releases and notices; administering
 and informing users about our research and program strategies and charitable activities.
- Marketing and research communications: communicating with you via any means (including
 via email, telephone, text message, social media, mail) news items and other information in
 which you may be interested, subject to ensuring that such communications are provided to
 you in compliance with applicable law, including, without limitation, sending out newsletters;
 updates and announcements; publications; information about events, contests (including the
 World Justice Challenge and the Lewis Journalism Prize) and competitions, and soliciting
 experts to join our rule of law surveys.
- Communications and IT operations: communicating with you; managing our communications systems; operating of IT security; and IT security audits.
- Communications in relation to our provision of services to you: reviewing and responding to proposal documents, feedback, comments, photos, videos, or other information you submit via online portals, electronic forms, surveys, or interactive portions of our sites (such as the Community Forum).
- Health, safety and legal compliance: to maintain the safety, security, and integrity of our website, cause, projects, databases and other technology assets; compliance with legal obligations.
- Analytics: to analyze and assess current and potential areas of interest; to create aggregated, de-identified and/or anonymized data.
- Financial management: for sales, finance, corporate audit, and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on our website, our cause, projects, and other related matters.

5. DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To our trusted contractors and service providers we use to support our causes (such as IT service providers; payment processors; marketing service providers; web service providers; etc.), located anywhere in the world, including Civilized Discourse Construction Kit, Inc. to host our Community Forum, subject to the requirements noted below in this Section 5;
- With your consent.
- To comply with any court order, law, or legal process, including investigation of potential violations and to respond to any government or regulatory request.
- To detect, prevent or otherwise address fraud, security or technical issues.
- To enforce or apply our <u>Terms of Use</u> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of WJP, our customers, or others.
- For any other purpose disclosed by us when you provide the information.

If we engage third-party processors to process your personal information on our behalf, such third-party processors will be subject to binding contractual obligations to (i) only process the personal information in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of personal information; together with any additional requirements under applicable law.

6. HOW LONG WILL WE KEEP YOUR INFORMATION

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, potential risk of harm from unauthorized use or disclosure of your personal information, purposes for which we process your personal information and whether we can achieve those purposes through other means, and applicable legal requirements.

We intend to keep your personal information for as long as necessary to fulfil the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to provide our products and services to you, to improve and customize the products and services, to comply with our legal obligations (including retention and documentation obligations), resolve disputes and enforce our legal agreements and policies.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. YOUR RIGHTS

You may exercise your rights by writing us an e-mail to <u>wjp@worldjusticeproject.org</u> simply informing us of the reason for your request and the right that you wish to exercise. We may request you to provide a copy of a document evidencing your identity if we deem necessary to be able to identify you. Subject to applicable law, you may have a number of rights regarding the processing of your personal information, including:

- the right to request access to, or copies of, your personal information that we process or control:
- the right to request rectification of any inaccuracies in your personal information that we process or control;

- the right to request, on legitimate grounds:
 - o erasure of your personal information that we process or control; or
 - restriction of processing of your personal information that we process or control;
- the right to object, on legitimate grounds, to the processing of your personal information by us or on our behalf;
- the right to have your personal information that we process or control transferred to another controller, to the extent applicable;
- where we process your personal information on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints with a Data Protection Authority regarding the processing of your personal information by us or on our behalf.

8. LINKS TO THIRD PARTY WEBSITES

This Website may also contain links to websites operated by other companies, including websites operated by our third-party service providers and distributors, and unrelated third parties. This Privacy Policy does not apply to personal information collected on any of these other websites. When you access third-party websites through a link on one of our Website, please review the Privacy Policy posted on that website.

9. COOKIES AND OTHER RELATED TECHNOLOGIES

We may collect information through the use of "cookies," tracking pixels, and similar technologies. Cookies are small text files created by websites and stored on your device. They provide a way for us to recognize you and keep track of your settings and preferences. A script is a piece of program code that is used to make our website function properly and interactively. This code is executed on our server or on your device. A web beacon (or a pixel tag) is a small, invisible piece of text or image on a website that is used to monitor traffic on a website. In order to do this, various data about you is stored using web beacons. We use cookies and similar technologies to provide you with a secure experience and to understand, among other things, how you navigate our website, learn what content is popular, recognize repeat users, and save your account information. Our website is not configured to read or respond to "do not track" settings or signals in your browser settings. When you visit our website for the first time, we will show you a pop-up with an explanation about cookies. You can also disable the use of cookies via your browser, but please note that our website may no longer work properly for you.

We use Google Analytics (for further information see here) to get a better understanding of our website's usage.

10. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Because of the international nature of our organization, we may need to transfer your personal information to third parties as noted above (subject to binding contractual obligations, also considered "standard contractual clauses" where required by applicable law), solely in connection with the purposes set out in this policy. For this reason, we may transfer your personal information to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically. If we make material changes, we will update you via our website, by email or other communication. We encourage you to stay up to date about our privacy practices by reviewing this policy periodically. Continued use of our website following notices of changes to this policy indicates your acceptance of such changes and agreement to be bound by the updated policy terms.

12. CONTACT INFORMATION

For privacy-related requests or complaints, you can contact us at the following address:

World Justice Project 1025 Vermont Ave, NW #1200 Washington, D.C. 20005 United States

Phone: +1 202 407 9330

Email: wjp@worldjusticeproject.org

If you live in the European Union ("EU"), you may be a "data subject" for purposes of the General Data Protection Regulation ("GDPR"), a legal framework that establishes guidelines for the collection and processing of personal information from individuals who live in the EU. We value the rights of such individuals under the GDPR, and their privacy, and have therefore appointed Prighter Group, with its local partners, as our privacy representative in the EU, and as a point of contact in the EU. Prighter gives such individuals an easy way to exercise privacy-related rights (including to access or erase personal data). If you want to contact us via our EU representative, Prighter, or make use of your GDPR data subject rights, please visit the following

website: https://prighter.com/q/16272286157