

NOTICE: On 11 January 2019, oBK adopted an amended Privacy Policy, providing as follows:

Welcome to the onlinelearning site of the Brahma Kumaris (oBK). This site is operated by 3iMOOX.org, a charitable organisation registered in The Netherlands (RSIN 859487544). 3iMOOX.org has partnered with Brahma Kumaris Centers for Spiritual Learning registered with the Australian Charities and Not-for-profits Commission (ABN 15 286 324 686) to design, develop and operate Massive Open Online Courses (MOOCs) on meditation and related topics.

3iMOOX is solely responsible for the operation and the courses offered through this website. We care about the confidentiality and security of your information. This Privacy Policy applies to information that 3iMOOX collects through the oBK Site when you interact with the oBK site and with other users. Your information is received and controlled by 3iMOOX according to this Privacy Policy when you sign up for an oBK account or otherwise use the oBK Site. If you do not accept the terms of this Privacy Policy, then please do not access, browse, or register for the oBK Site or enroll in any courses. If you choose not to provide certain information required to provide you with various products and services offered on the oBK Site, then you may not be able to establish a user account or obtain those products or services.

This Privacy Policy is organized as follows:

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INFORMATION THAT 3iMOOX COLLECTS FROM YOU (INCLUDING PERSONAL INFORMATION)

3iMOOX directly collects information when you:

- sign up for an oBK user account and create an oBK user profile;
- enroll and participate in online courses;
- send email messages to oBK (including messages to learner support);
- participate in user surveys; and
- participate in public forums, webinars, and other interactive experiences on [the oBK Site](#).

oBK requires your Personal Information only in limited circumstances when you sign up for an oBK user account (name, username, email address).

To the extent that 3iMOOX associates the information that 3iMOOX collects directly or indirectly with an individual (for example, you), the association is based on Personal Information in your account profile.

You may voluntarily choose to share additional Personal Information on the oBK Site, for example:

- in your oBK account profile (and you may display a limited or full profile to other oBK Site users);
- when participating in a course, forum, webinar, or other interactive experience on the oBK Site (noting that in some cases, this information is shared with a third party that provides tools or other assistance for the oBK Site or a course).

oBK encourages you to use discretion before voluntarily sharing additional Personal Information on the oBK Site. (If you later choose to delete your oBK account, deletion of your Personal Information will be subject to the process and limits outlined below.)

3iMOOX uses Cookies and other Tracking Technologies for the following purposes:

- when necessary for system administration, security, and integrity to ensure the oBK Site works properly for you. Without these technologies, the oBK Site may not function correctly;
- to enable analytics, performance and functionality, to help 3iMOOX gather information about how visitors use the oBK Site and monitor oBK Site performance, and to enhance your experience by recognizing and remembering whether you have visited the oBK Site before and may have any personal preferences.

You have some options for managing Cookies and other Tracking Technologies.

These include:

- Modifying your browser settings: You should be able to control how and whether your

web browser accepts Cookies by adjusting its privacy and security settings. The “help” feature of the menu bar on most browsers will tell you how to stop accepting new Cookies, how to receive notification of new Cookies, and how to disable existing Cookies. If you reject oBK’s Cookies, many functions and conveniences of the oBK Site may not work properly.

HOW YOUR INFORMATION IS USED

3iMOOX uses information, including Personal Information, to carry out the following purposes:

- **Operate and improve the oBK Site** – This includes creating and improving features that support the oBK community and enable oBK Site usage at scale. This also includes personalizing the oBK Site, so your learning experience is tailored to your interests and needs.
- **Create, administer, provide, and teach courses** – This includes creating and improving the delivery of massive open online courses and programs on oBK. This also includes personalizing courses, so your learning experience is tailored to your interests and needs, and assessing your performance and awarding certificates.
- **Offer and improve products and services** – This includes enabling you to navigate the oBK Site, to enroll and participate in courses and programs on the oBK Site, to learn effectively in such courses and programs, and to purchase or obtain products and services on the oBK Site.
- **Develop and maintain the security and performance of the oBK Site** – This includes tracking oBK Site outages and creating software solutions, detecting violations of the Honor Code and Terms of Service, and monitoring uses, misuses, and potential misuses of the oBK Site.
- **Communicate with you** – This includes answering your course and platform questions, notifying you of course and oBK Site maintenance and updates, marketing to you about course offerings, programs, news, and related products and services of 3iMOOX or 3iMOOX affiliates, and as permitted under applicable law, sending you communications about products or services of selected business partners that may be of interest to you.
- **Support scientific research including, for example, in the areas of cognitive science and education** – This includes collaborating to enable and conduct research about how learners access and master course materials online, with the goal of improving course outcomes.
- **Track oBK Site usage against goals and mission** – This includes performing analytics to evaluate access to and performance in courses and course-related products and services and to report aggregate usage information (not Personal Information) to business partners and external audiences.

- **Exercise, enforce, and comply with legal rights and obligations** – This includes responding to subpoenas, court orders, or other legal process; and investigating, preventing, or taking action regarding illegal activities, suspected fraud, security or technical issues, or to protect the rights, property, or safety of 3iMOOX or others, and as otherwise required by applicable law.

3iMOOX may also seek your consent for additional uses of information, including Personal Information, and will use it only for the purpose described to you. All use of Personal Information is subject to applicable law.

HOW YOUR INFORMATION IS SHARED

3iMOOX may share information, including Personal Information, with third parties for the following purposes:

- With service providers, contractors, and other third parties that help carry out the uses described above – 3iMOOX requires third parties to: (1) abide by this Privacy Policy and applicable law; (2) handle Personal Information in a confidential manner and maintain adequate security; and (3) use Personal Information only as needed to fulfill the relevant purpose(s). In some cases, the oBK Site and individual courses are integrated with third-party services or contain links to websites published by third parties, including other content providers as well as service providers. These third parties are responsible for their own privacy practices, so you should pay attention anytime you are redirected to a third-party website and be sure to review its privacy policy.
- With other learners in courses that you take and with other visitors to the oBK Site, to create an interactive learning environment, support class participation, and share course information – This includes sharing comments, coursework, or other information or content that you submit to a portion of the oBK Site designed for viewing by other class members or for public communication. This also includes providing opportunities for you to communicate with other users who may have similar interests or educational goals, for instance, recommending specific study partners or connecting potential student mentees and mentors. In such cases, 3iMOOX may use all information collected about you to determine who might be interested in communicating with you, but will only provide others your username (for clarity, no disclosure of your real name or email address).
- With affiliates of 3iMOOX for their use consistent with this Privacy Policy. 3iMOOX may also seek your consent for additional disclosures of information, including Personal Information, and will share it only as described to you. In addition, 3iMOOX or Partner may share with the public and with third parties, including but not limited to researchers and business partners, information and Personal Information that is de-identified or

aggregated in a manner that does not personally identify you.

HOW TO MANAGE YOUR PERSONAL INFORMATION

You can manage your Personal Information through learner features on the oBK Site and requests to the oBK learner support team. 3iMOOX will provide support to the extent required by applicable law (for example, learners in the European Union) and more broadly when possible, as a courtesy in our sole discretion. 3iMOOX will notify you in the event that 3iMOOX is unable to meet a request that is not legally required.

Access and correct your Personal Information

Much of your Personal Information is available in your oBK account. Your name, email address, and other identifiable profile information is editable through the profile settings in your oBK account except as noted below. Your account dashboard lists all current and archived courses in which you have enrolled. The dashboard also contains copies of your answers and other participation and performance in courses.

Please contact oBK learner support to access and update this or other information.

Exceptions:

- *Usernames cannot ever be changed. This is a open-edx supplier system restriction. Because usernames identify you in courses and elsewhere on the oBK Site, 3iMOOX encourages you to use discretion in choosing your username. If you want to protect your identity, do not use your real name or a name identifiable to you as your username.*
- *3iMOOX does not track or index everytime or every place on the oBK Site when or where a learner may volunteer Personal Information, so 3iMOOX will not be able to help you locate or manage all such instances. 3iMOOX encourages you to use discretion before volunteering Personal Information on the oBK Site.*

Restrict or object to the processing of Personal Information

If you want to manage emails and other communications to you, you may update your preferences in your oBK account dashboard, follow the steps described in links at the bottom of email messages, or contact oBK learner support. You may object to, or request that 3iMOOX's use of your Personal Information for other purposes by contacting the oBK learner support team. Please note that if you choose to restrict 3iMOOX's ability to process Personal Information, and the processing is otherwise required to provide you with various services and products offered on the oBK Site, you may not be able to establish an oBK user account or enroll for a course, and 3iMOOX may not be able to provide you with those services or products.

Delete account and Personal Information

To request deletion of your oBK account and Personal Information, you should click the button labeled “Delete my account” in your oBK account settings. Because deletion on the oBK system is a permanent action and cannot be reversed, 3iMOOX may ask you to complete a process that aims to confirm your authority to manage the oBK account affected by your request.

With respect to your oBK account, 3iMOOX will permanently:

- deactivate your oBK account,
- remove the active profile,
- retire your username, and
- remove you from oBK email lists.

With respect to your Personal Information, 3iMOOX will permanently delete your oBK account profile Personal Information from the oBK Site. As noted above, to the extent that 3iMOOX associates the information that it collects directly or indirectly with an individual (for example, you), the association is based on Personal Information in your oBK account profile. By erasing the Personal Information in your oBK account profile, the remaining information about your activity on the oBK Site will no longer be associated with you, except as noted below. These changes will be applied to data stores that are used for operation of the oBK Site.

Exceptions:

- *Deletion will not apply to historical activity logs or archives unless and until these logs and data naturally “age-off” the oBK system.*
- *3iMOOX does not track or index everytime or every place on the oBK Site when or where a learner may volunteer Personal Information, so 3iMOOX will not be able to help you locate or manage all such instances. 3iMOOX encourages you to use discretion before voluntarily sharing your Personal Information on the oBK Site.*
- *3iMOOX will archive course data (in a manner and to the extent permitted under applicable law) to serve its mission to enable scientific research on cognitive science and education.*
- *3iMOOX cannot always delete records of past interactions and transactions. For example, records relating to previous activities on the oBK Site must be retained for financial reporting, audit, and compliance reasons.*
- *3iMOOX and each Member will retain and use Personal Information as necessary to comply with its legal obligations, resolve disputes, enforce its agreements, and as otherwise permitted by applicable law.*

Data retention

3iMOOX will retain your Personal Information for as long as your account is active or as needed to provide you with services; to maintain a record of your transactions for financial reporting,

audit, and compliance purposes; and to comply with 3iMOOX's legal obligations, resolve disputes, enforce its agreements, and as otherwise permitted by applicable law. Upon your request that 3iMOOX deactivate your account and delete your information, 3iMOOX will follow the process described above, including without limitation archiving your course data (in a manner and to the extent permitted under applicable law) to serve its mission to enable scientific research on cognitive science and education.

STORAGE & SECURITY

3iMOOX stores information, including Personal Information, on its own servers and also on servers of companies that 3iMOOX hires to provide services. In each case, information may be stored in the countries where 3iMOOX operates, and in countries where 3iMOOX service providers operate. If you are in the European Union, Switzerland, or other regions with laws governing data collection and use, you acknowledge that 3iMOOX may transfer, process and store your personal information in other countries, the privacy laws of which may be considered less strict than those of your region.

3iMOOX controls its own copy of information collected through the oBK Site and has an information security program designed to protect information in its possession or control. This is done through a variety of privacy and security policies, processes, and procedures. 3iMOOX uses administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the information that it collects, receives, stores, or transmits. Nonetheless, no method of transmission over the Internet, or method of electronic storage, is 100% secure; and therefore, 3iMOOX cannot guarantee its absolute security. While 3iMOOX works hard to ensure the integrity and security of its network and systems, 3iMOOX cannot guarantee that its security measures will prevent "hackers" or other unauthorized persons from illegally accessing or obtaining information. If 3iMOOX learns of a security breach involving its copy of your Personal Information, 3iMOOX may attempt to notify you electronically so that you may take appropriate protective steps. By using the oBK Site or providing Personal Information to oBK, you agree that 3iMOOX can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the oBK Site. If a security systems breach occurs, 3iMOOX may post a notice on the oBK homepage (www.onlinelearning.brahmakumaris.org) or elsewhere on the oBK Site and may send an email to you at the email address associated with your oBK account.

Depending on where you are located, you may have a legal right to receive notice of a security breach, involving your Personal Information, in writing.

PRIVACY POLICY UPDATES

This Privacy Policy will be reviewed and updated from time to time. When changes are made, the Privacy Policy will be labeled as "Revised (date)," indicating that you should review the new

terms, which will be effective immediately upon posting on this page, with an updated effective date. By accessing the oBK Site after any changes have been made, you accept the modified Privacy Policy and any changes contained therein. In case you miss the notification referenced above, be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

CONTACT INFORMATION

If you have privacy concerns, have disclosed data you would prefer to keep private, or would like to access the Personal Information that 3iMOOX maintains about you, please contact us at contact@3imoox.org.

GLOSSARY

Cookies are unique identifiers usually in the form of small data files placed on your device that send certain information about your activity on the oBK Site or in an email communication back to 3iMOOX or the authorized third party that served the cookie. 3iMOOX or third parties may also use Flash cookies. oBK Site consists of all content and pages located within the onlinelearning.brahmakumaris.org web domain and all oBK mobile applications. Personal Information is information that specifically identifies you or that, when combined with other information, could be used to identify you. Tracking Technologies are web beacons, clear gifs, pixels, and similar technologies that are also unique identifiers used to track your online activity but are not stored on your device.

Effective Date:

07 December 2018