

Epolleo Global Privacy Policy

Effective Date: 7-22-2025

Last Updated: 7-22-2025

1. Introduction and Scope Epolleo is a nonprofit organization dedicated to advancing global microbial biodiversity and educational outreach through secure, ethical digital systems. This Privacy Policy outlines how Epolleo collects, uses, stores, and protects your personal information. It applies to all website visitors, users, contributors, and data subjects globally. This policy is binding and aligns with major privacy regulations, including:

- General Data Protection Regulation (GDPR – EU/EEA)
- UK General Data Protection Regulation (UK GDPR)
- California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)
- Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)
- Australia Privacy Act
- Children's Online Privacy Protection Act (COPPA – U.S.)

By using our website, hosted on GoDaddy, or submitting data through our platforms, you agree to this policy. If you do not agree, please stop use immediately.

2. Information We Collect We collect both personally identifiable and non-identifiable information:

- **Personal Data Provided by You:** Includes name, email, organizational affiliation, education level, role, consent forms, and voluntarily submitted information in forms.
 - **Educational Metadata:** Includes anonymized student data submitted by verified educators, class-level identifiers, and project-related tags.
 - **Technical and Log Data:** Automatically collected information including browser type, IP address, time zone, date/time of visits, and device identifiers.
 - **Search Behavior and Usage Analytics:** Includes search terms, database access logs, clickstream data, and interaction timestamps.
 - **Geolocation Information:** Collected via IP lookup, subject to user consent.
 - **Cookies and Tracking Pixels:** Used for functionality, diagnostics, and performance optimization. Consent banners and opt-out controls are provided in accordance with each jurisdiction's requirements.
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3. How We Use Your Data We process collected data to:

- Deliver requested services and respond to inquiries

- Maintain and verify user access to our scientific databases and tools
- Enable safe collaboration between educators, researchers, and innovators
- Conduct security audits and trace access to sensitive biological information
- Fulfill legal obligations and ensure biosafety and export control compliance
- Improve platform performance and user experience
- Support Epolleo's research, education, and Diversity Credit issuance processes.

No personal data is sold or leased under any circumstances.

4. Legal Basis for Processing Under GDPR, UK GDPR, and equivalent global statutes, Epolleo processes your data based on:

- **Consent:** For receiving communications or using non-essential cookies.
 - **Contractual Necessity:** To manage user accounts or fulfill MTAs.
 - **Legal Obligation:** To comply with recordkeeping, biosafety, and grant requirements.
 - **Legitimate Interest:** To secure our infrastructure, enforce our policies, and analyze performance metrics.
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5. Data Sharing and Disclosure Data is shared with:

- **Internal Teams:** Limited to trained personnel on a need-to-know basis.
- **Service Providers:** GoDaddy (hosting), Google Analytics (anonymized), and file storage vendors, all of which are subject to contractual data protection clauses.
- **Government Authorities:** When legally compelled under subpoena or biosafety investigation.
- **Educational and Scientific Review Panels:** Under nondisclosure agreements for project approvals or grant matching.

We use Data Processing Agreements (DPAs) for all third-party vendors.

6. Cookies and Tracking Technologies Our site uses first-party and third-party cookies:

- **Essential Cookies:** Required for site functionality and session management.
- **Analytics Cookies:** For usage metrics and trend analysis.
- **Consent Management:** Cookie banners are dynamically displayed based on the user's location and settings.
- **DNT Signals:** Where browser-enabled, we respect Do Not Track preferences.

Users may update cookie preferences anytime via their browser or our settings portal.

7. Data Retention Policy We retain data only for as long as necessary:

- **User Accounts:** Retained until deletion request or inactivity threshold (5 years).
- **Student Contributions:** Anonymized and preserved for academic reproducibility.
- **Search Logs and Audit Trails:** Retained for up to 7 years for biosafety compliance.
- **Backups:** Secured and cycled on encrypted servers every 30 days.

Upon request, we will securely delete or anonymize data, subject to any applicable legal exceptions.

8. Your Rights Depending on your region, you may be entitled to:

- Access and correct personal data
- Request deletion (“right to be forgotten”)
- Object to or restrict processing
- Withdraw previously granted consent
- Data portability (structured, machine-readable format)
- File a complaint with a supervisory authority (e.g., ICO, EDPB, CPPA)

To exercise rights, contact privacy@epolleo.org with proof of identity. We respond within 30 days.

9. Children’s Privacy (COPPA & International Compliance) Epolleo complies with all applicable laws protecting minors:

- **Under 13 (U.S.):** Parental or school consent is required before any data collection.
 - **Under 16 (EU/UK):** Data collected only with verified adult intermediary (e.g., teacher).
 - Student data is anonymized before analysis or reporting.
 - No direct communication is conducted with minors.
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10. Security Measures Security is our highest priority:

- End-to-end SSL/TLS encryption for data in transit
- Encrypted-at-rest database storage on GoDaddy infrastructure
- Role-based access control and minimum privilege enforcement
- Routine penetration testing and log auditing
- MFA for admin-level access
- Annual third-party compliance review

If a data breach occurs, we will notify users within 72 hours as required by GDPR and applicable laws.

11. International Transfers If data is transferred outside of your country:

- Transfers to the U.S. (e.g., GoDaddy servers) are protected by Standard Contractual Clauses (SCCs).
- Data access logs are subject to regional audit rights.
- We use encrypted VPN tunnels for high-sensitivity operations when needed.

12. Third-Party Services We use secure external vendors with limited scope:

- **GoDaddy:** Hosting and domain services.
- **Google (Analytics):** Site performance tracking (IP anonymized).
- **Mailgun or SendGrid:** Transactional email.
- All vendors must comply with global data protection requirements via DPAs.

13. Accessibility and Inclusive Use Epolleo is committed to digital accessibility:

- Our site conforms to **WCAG 2.1 Level AA** standards.
- Forms and materials are screen-reader compatible.
- Contact privacy@epolleo.org to request alternate formats or accessibility accommodations.

14. Changes to This Policy We may revise this policy in response to:

- Regulatory changes
- Service or infrastructure updates
- Audit recommendations

Users will be notified by email and homepage banner for material changes. Archived versions are available upon request.

15. Contact Information Epolleo Data Protection Contact:

Email: privacy@epolleo.org

Mail: Epolleo, 47080 273rd Ave, Harrisburg, SD 57032-8102

DPO Contact (EU/UK): dpo@epolleo.org

16. Jurisdiction and Dispute Resolution This Privacy Policy is governed by the laws of the State of South Dakota. Any dispute arising out of this Policy shall be resolved through:

- Initial mediation, then binding arbitration
- Jurisdiction of courts located in Minnehaha County, South Dakota, USA unless required otherwise by law

We appreciate your trust in Epolleo and are committed to handling your data with transparency, integrity, and care.