

## **Privacy policy**

Vipassana Research Institute (“VRI “ or “we” or “us” or “our”) cares for privacy of our user(s) (“user” or “you” or “your”). VRI is registered as a Public Charitable Trust, with its registered office at Green House, 2nd floor, Green street, Fort, Mumbai – 400 023, India ([www.vridhamma.org](http://www.vridhamma.org)). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website(s), [www.vridhamma.org](http://www.vridhamma.org), [www.os.vridhamma.org](http://www.os.vridhamma.org) (the website(s)), mobile application (the “mobile app”), products or while availing our services. Please read this privacy policy carefully.

Your use of the website(s)/mobile app/our products and services indicates your approval of this privacy policy and your consent to the collection, use and disclosure of your information and our data practices according to the terms of this policy.

However, please note that the specific details of the privacy policies of the Vipassana organizations around the world may differ from country to country. A copy of the particular privacy policy applicable to your information can be obtained from the Vipassana course registrar or at the Vipassana course site upon your arrival.

This privacy policy along with the [policy for processing, disclosures and consents for course applications](#) shall form an integral part of the VRI’s [terms of use](#).

## **THE INFORMATION WE COLLECT**

### **A. Data required for Course registration**

If you choose to register for a Vipassana meditation course through on-line or through mobile app, the types of personally identifiable information that may be collected include: name, address, e-mail address, photo, telephone number, fax number, and all the other highly personal information like particulars of health, medication, and any other information that is called for on the application form and on the course registration form.

Your personal information contained in your course application and registration forms are stored in a secure manner within our/Vipassana Centres’ facilities and the only persons having access thereto are those who have a specific "need to know", such as the course registrar, the centre/course manager, centre teacher or any person authorised by the centre teacher and the assistant teacher(s) conducting the course(s) to which you seek admission.

### **B. Personal Data**

Demographic and other personally identifiable information (such as your name email address, phone number) that you voluntarily give to us when choosing to participate in various activities or availing services/products related to the website(s)/mobile app or creating an account with website(s) and/or mobile app.

### **C. Financial data**

VRI does not collect or process your credit or debit or any other type of card (“Payment Card”) data. We utilize the services of third-party vendors to facilitate

and process such transactions. You are requested to review their privacy policy and contact them directly for any query or questions.

#### **D. Geo-location information**

We may request access or permission to and track location-based information from your mobile or other device, either continuously or while you are using the mobile app, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

#### **E. Mobile device access**

We may request access or permission to certain features from your mobile or other device, including your mobile or other device's calendar, camera, contacts, microphone, social media accounts, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

#### **F. Device data**

Device information such as your mobile or other device's ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide

#### **G. Push notifications and text messages**

We may request to send you push notifications regarding your account or the mobile app. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

In addition, we may send you text messages for certain events or details of group meditations/sittings. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

#### **H. Third-party data**

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the website(s)/mobile app the permission to access this information.

#### **I. Data from questionnaires and surveys**

Personal and other information you may provide while filling questionnaires and/or responding to surveys for research or other purposes.

The information specified above may be acquired by us directly from the users, through our affiliates or automatically through cookies and other tracking technologies, details of which are provided in this privacy policy or through any other means provided in this policy.

Affiliates include joint venture partners, entities involved in the teachings of Vipassana meditation as taught by S. N. Goenka in the tradition of Sayagyi U Ba khin, entities formed by Mr. S. N. Goenka/as per his guidance, any other entities that we control or that are under common control with us or any other sister concern.

## **HOW WE USE YOUR INFORMATION**

We may use information collected about you via website and the mobile app for the following purposes:

**A. Registration for courses**

We use the information you provide about yourself in your application and registration forms to enable the local or regional Vipassana organization to which you have applied to evaluate your application for admission to a course and to register you for that course.

In addition, we have found that people who attend a Vipassana course frequently attend subsequent courses over their lifetime. In order to facilitate subsequent attendance at courses and to maintain a record of a student's history and experience the local or regional Vipassana organization(s) may maintain the course data of each student indefinitely in the absence of a legal prohibition to do so in certain jurisdictions. In some cases, the local or regional Vipassana organization may use your name, postal address and/or email address to send you information about Vipassana related activities and facilities, if you have not opted-out of such contact. We also use this information to process the data if you use 'track application' feature of the app or IVR facility offered by VRI through a third party.

**B. Other purposes:**

- VRI may store and use user's name, postal address and/or email address to send the information about Vipassana related activities, facilities and newsletters, if users have not opted-out of such contact.
- VRI may use the information that user provide about others while sharing the information or pages or media content to enable VRI to send them user's greeting and VRI's website address/details of mobile app.
- VRI may use the non-personally identifiable information that it collect to improve the design and content of our website and to enable us to understand location of the user and which files users are accessing within the site, i.e., to use this information in the aggregate to analyse site usage. This Vipassana Website does not ever make your personally identifiable information available to third parties, for commercial or any other reason.
- VRI may use information provided by users during purchase or donation for responding to users' requests, customizing future shopping for the users, improving our stores, and communicating with the users.
- VRI may use the relevant information to assist law enforcement, respond to subpoena, legal obligations and for other lawful purposes.
- VRI may use the required information to deliver any content/product/newsletter or any other material as per the request of a specific user, whenever necessary.
- VRI may de-identify and aggregate data collected through the Services and use it for any purpose. Such information does not identify you individually.
- To enable users to view and/or download books, newsletters, and to play/download audios and videos, as per user's requirements.
- If enabled by a user, to keep a log of meditation time of audios/videos from group sittings, live group sittings and available audios (whether downloaded or not downloaded).

**C. In addition, VRI may use the information for the following purpose(s):**

- Compile anonymous statistical data and analysis for use, either internally or with the third parties.
- To perform necessary activities regarding various features offered through website(s)/mobile app.
- Create and manage your account.
- Deliver newsletters, and other information regarding the website(s), mobile app to you.
- Send you an email regarding your account or order.
- Enable user-to-user communications.
- Fulfil and manage purchases, orders, payments, and other transactions related to the products/services offered through website(s)/ mobile app.
- Generate your personal profile to make future visits to the website(s)/ mobile app more personalized.
- Increase the efficiency and operation of the website(s)/mobile app.
- Monitor and analyse usage and trends to improve your experience with the website(s)/mobile app.
- Notify you of updates to the website/mobile app.
- Offer new products, services, mobile applications, and/or other recommendations to you.
- Perform any other activities as needed, to serve you in the best possible way.
- Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
- Process payments and refunds.
- Request feedback and contact you about your use of the website/mobile app.
- Resolve disputes and troubleshoot problems.
- Respond to product and customer service requests.
- Solicit support for the website(s)/mobile app.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **A. By Law or to protect rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, regulation, or to assist law enforcement and respond to subpoena/summon. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **B. Third-party service providers/vendors**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, IVR, email delivery, hosting services, and customer service.

### **C. Online postings**

When you post comments, contributions or other content on the website(s)/mobile app, your posts may be viewed by all users and may be publicly distributed outside the website(s)/mobile app in perpetuity.

#### **D. Affiliates**

We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include joint venture partners, entities involved in teachings of Vipassana meditation as taught by S. N. Goenka in the tradition of Sayagyi U Ba khin, entities formed by Mr. S. N. Goenka/as per his guidance, any other entities that we control or that are under common control with us or any other sister concern.

#### **E. Social media contacts**

If you connect to the website(s)/mobile app through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

#### **F. Collection of information by third-party sites**

This privacy policy only addresses the use and dissemination of information that we collect from you. Our website(s)/mobile app may contain links to other site(s) whose information practices may be different than ours.

Since VRI and the various Vipassana organizations do not control the privacy policies of third parties, you are subject to the privacy customs and policies, if any, of that third party, and VRI or any other vipassana organizations/Centres shall not be responsible for the use or dissemination of your personal information by that third party. Therefore, we encourage you to ask questions before you disclose your personal information to others.

If you are using the website(s) or mobile app for the registration for the courses, you will be governed by the terms of additional policy for processing, disclosures and consents for course applications, which you can view while applying for the course.

In addition to the above, if required, VRI may disclose your personal information with your consent.

### **TRACKING TECHNOLOGIES**

#### **A. Cookies and web beacons**

We and our service providers may use cookies, web beacons, tracking pixels, and other tracking technologies on the website(s)/mobile app to help customize the website(s)/mobile app and to improve your experience. When you access the website(s)/mobile app, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but please note that such action could affect the availability and functionality of the website(s)/mobile app. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

A "cookie" is a text file containing a small amount of information which our server downloads to your personal computer when you visit our website(s)/mobile app. The file contains a unique number so that our server knows which PC/mobile/other device it is talking to. We create a session cookie when you use our online application form to register for a course. We may also use a session cookie to know whether you have logged in as an old student or not. Some cookies are allocated to your PC/mobile/any other device only for the duration of your visit to a website(s)/mobile app, and these are called session based cookies. These are automatically deleted when you close down your browser.

## **B. Website/mobile analytics**

We may also partner with selected third-party vendors to allow tracking technologies on the website(s)/mobile app through the use of first party and third-party cookies, to, among other things, analyse and track user's use of the website(s)/mobile app, determine the popularity of certain content and for better understanding of online activity. These software(s) may record data such as how often you engage with the products, services available on website(s)/ mobile app, the events that occur within the products, website(s), mobile app, aggregated usage and performance data, and where the products/mobile app were downloaded from. We may link the data we store within the analytics software to any personal data you submit within the website(s)/mobile app.

By accessing our website(s)/mobile app, you consent to the collection and use of your information by these third-party vendors/service providers. You are requested to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors/service providers. However, if you do not want any information to be collected and used by tracking technologies, you can install and/or update your settings for such tracking technologies.

### **Google Analytics**

We use Google Analytics to measure traffic on our websites/apps. This is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help us to analyse how our sites are used. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. If you'd like to opt out of tracking by Google Analytics, visit the Google Analytics opt-out page: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout). Google has their own Privacy

Policy which you can review here: [support.google.com/analytics/answer/6004245](https://support.google.com/analytics/answer/6004245).

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set specified by Google.

### **C. Log data**

As is true for most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, device identifier, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, and other usage data. We may combine this automatically-collected log information with other information we collect about you. We use log data to monitor use of our sites and services, for security purposes and for technical administration.

### **D. Third-party websites**

Our website(s)/mobile app may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the website(s)/mobile app, any information you provide to these third parties is not covered by this privacy policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, please read and understand privacy policies and practices (if any) of the third party responsible for that website, and take those steps necessary to, in your discretion, to protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the website(s)/mobile app.

### **CHILDREN'S PRIVACY**

In accordance with the U.S. Children's Online Privacy Protection Act of 1998 (and comparable legislation of other countries, including GDPR), we will never knowingly request or solicit personally identifiable information from anyone under the age of 18 without verifiable parental consent. In the event we receive actual knowledge that we have collected such personal information without the requisite and verifiable parental consent, we will delete that information from our database as quickly as is practical.

### **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please note that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security of your personal information.

All teachers and assistant teachers of Vipassana as well as all meditation centre staff and Dhamma workers/servers only have access to your information submitted on the course application and registration forms on a "need to know" basis. We take all

reasonable steps to ensure that such information is maintained in confidence and safeguarded against disclosure to or access by third parties once it reaches the centre or the non-centre course registrar to which it is submitted. However, the particular manner in which your information is maintained, stored and used is governed by the particular privacy policy applicable within the country where the particular course for which you are registering is being held. The only risk of inadvertent disclosure of your information can be in the case of applications submitted by email and that is while the information is being sent over the open internet, as under some circumstances our email application facilities are not secure. Please do not use the email application facility on this website unless you are prepared to personally take this risk.

Our application forms and the personal data contained therein are handled by storage and processing on computers. In addition, the computers of the different Vipassana organizations are located in various countries of the world. Your submission of an application form to attend one of our courses constitutes your unequivocal consent to the storage and processing of your application data on a computer and to the cross-border transfer of your personal information contained in the application form as well as the handling and storage of all information you submit to us in the registration process in accordance with the privacy regulations of the local or regional jurisdiction. In addition, in some cases the email service of a centre to which an application is submitted may be provided through Google/android apps and apple store. As a result, the handling of the data in your application to that centre is subject to the privacy and security policies of Google/ android apps and apple store, as set forth in their publications that are available on their websites.

For the welfare of the students, the local or regional Vipassana organization may consider it necessary to take and retain notes on any health concern or behaviour in relation to the course that is inconsistent with the Code of Discipline or that otherwise indicates that a student should be restricted from attending future courses or will need additional support during a future course. In the rare event of this occurring, it is our understanding that the local or regional Vipassana organization will ensure that such notes will be entered on a computer and shared in confidence with assistant teachers and authorized course registrars involved in future courses. Your attendance at a course will constitute unequivocal consent to the handling and storage of such notes and the cross-border transfer thereof subject to applicable laws, including those discussed below (“Specific Privacy Requirements”). Should you wish to know more about how such notes are retained you should contact the local or regional Vipassana organization to determine what its privacy policies are concerning such notes and other personal data.

## **USER’S RIGHTS AND CHOICES REGARDING INFORMATION**

### **A. Account deactivation/updation**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account.
- Contacting us using the contact information provided below to delete/deactivate the account.

Upon your request to deactivate/terminate/delete your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files for analytical purposes, to prevent fraud, collect any fees owed, troubleshoot problems, assist with any investigations, enforce our terms of use and/or comply with legal requirements or to take actions we deem necessary to protect the integrity of our services /products/website(s)/mobile app, our users, or to take other actions permitted by law.

After you deactivate your account, you will not be able to sign into the website(s)/mobile app or access any information stored in connection with previous receipt/account with our website(s)/mobile app. You may open a new account at any time.

Upon termination/deletion of your account on the website(s)/mobile app, you may not be able to avail the features like IVR facility, track the application etc. Further, please note that even after deletion of your account on website(s)/mobile app, data regarding your registration will be stored with the respective Vipassana Centres, where you have applied for the course, subject to local/regional legal requirements applicable to that Vipassana Centre. Users are requested to contact such Vipassana Centres for deletion of their data.

#### **B. Emails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the website(s)/mobile app.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below.

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are requested to contact the third party directly.

#### **C. Controls for Do Not Track (DNT) features**

Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Unfortunately, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

#### **D. Opt-Out/Opt-In**

VRI, regional Vipassana organizations, affiliate entities may provide you with the opportunity to "opt-out" of having us/them send you e-mail or postal mail about our/their services or other information related to Vipassana. In other cases, it may be possible for you to "opt-in" to certain VRI or local or regional information distribution lists. If you choose to have your name, email address or other personally identifiable information removed from any of those databases,

you can do so by contacting us or your local or regional Vipassana organization, as the case may be, and request removal.

## **E. Specific Privacy Requirements**

Please note that individual countries may have particular privacy law requirements. Vipassana organizations around the world have developed specific privacy policies to comply with these requirements that may differ in specific details from the more general policies set forth above. You may obtain a hard copy of these specific requirements by contacting the course registrar of the centre to which you have submitted your application and/or registration forms or at the course site upon your arrival. VRI is committed to protecting the “rights and freedoms” of individuals whose information VRI collects in accordance with such laws including but not limited to the General Data Protection Regulation (GDPR).

Pursuant to the applicable privacy regulations, you may have the following rights, among others, with regard to any data we collect or retain that relates to you:

1. the right of access, i.e. the right to obtain confirmation as to whether or not personal data is being processed, and where this is the case, to obtain access thereto;
2. the right to rectification and erasure, i.e. the right to have inaccurate data rectified and/or to have incomplete data completed, and the right to have personal data erased for legitimate reasons;
3. The right to impose restrictions on the processing of personal data, i.e. the right to request the suspension of data processing for legitimate reasons;
4. the right to data portability, i.e. the right to receive the data in a structured, commonly used and easily readable format, as well as the right to transmit the data to another data controller;
5. the right to object, i.e. the right to oppose the processing of data where legitimate reasons for this exist, including data processed for marketing and profiling purposes, if this is envisaged;
6. the right to contact the competent data protection authority in case of unlawful data processing.

You may exercise the rights listed above by writing to VRI at [meditationapp@vridhamma.org](mailto:meditationapp@vridhamma.org). In addition to the foregoing rights, each application form to register for a Vipassana Meditation course or related activity contains a series of disclosures and consents, which are also intended to protect your rights.

## **HOW TO CONTACT US**

If you have any questions or concerns about the privacy or any other policies of the Vipassana Website(s), apps or its implementation you may contact us at: [meditationapp@vridhamma.org](mailto:meditationapp@vridhamma.org).

**EFFECTIVE DATE**

This Privacy Policy is effective as of May 26, 2021. We reserve the right to modify the terms of this policy at any time and in our sole discretion. Your use of this website constitutes a binding acceptance of the above-referenced policies.