

FOUNDATION FOR HUMAN ENRICHMENT

PRIVACY POLICY

The Foundation for Human Enrichment (“FHE” or “we”) d.b.a. the Somatic Experiencing® Institute is dedicated to resolving trauma by providing state-of-the-art professional training and public education in the Somatic Experiencing (SE™) method worldwide.

In the conduct of business, we may obtain information that is personal to individuals. As an organization committed to protecting the privacy of users, FHE would like to describe how we collect, use and handle your information when you use our website and other services.

As used in this privacy policy (this “Policy”), “personal information” means any information that may be used to identify you personally such as name, address, email or telephone number.

We respect the value of your privacy and will do our best to maintain the confidentiality of personal information we collect in accordance with this Policy.

I. General Policy

A. Information Collection & Use

FHE may collect several types of information from and about you when you visit, register for a program, or place an order on our website.

- **Information You Give Us.** When you sign up for our mailing list, we collect your contact information, which consists of name, email address, city, state, and country/province. When you register for a training, FHE stores and uses your personal information to (1) verify completion of each training module; (2) eligibility to become a member of the SE Institute; and (3) eligibility to attend advanced level trainings. We also provide SE students with access to contact information for approved SE Personal Session and Case Consultation Providers. Although the Provider list contains several pieces of varying information, it includes only information that is disclosed to FHE through the provider himself/herself. Session and Consult Providers are placed on this list for the purpose of students finding providers to complete their SEP Requirements.
 - Session Providers and Consult Providers may opt out from the list by sending an e-mail to the email address provided below under the section of this Policy entitled “[CONTACT US.](#)” Or by selecting “I do not wish my information to be publicly available in the session provider directory” in the provider application at the time that they apply to provide sessions or consults.
- **Information We Collect Through Our Website.** For general visitors to our website, FHE uses Google Analytics, which collects anonymized data including page information, browser information, and user information as described below:
 - Page information
 - Each time a user visits a page on our website, we collect the URL and the title of the page the user is viewing.
 - Browser information
 - Users of our website also have their browser information collected through Google Analytics. This information includes the name of the user’s browser, the size of the

browser window, the resolution of the user's screen, what version of Flash the user is currently using, and whether or not the user has Java enabled.

- User information
 - FHE collects the user's location from the IP address where the hit originated, as well as the user's language from the user's browser settings.

- **Credit Card Information**

FHE will protect the confidentiality and security of the credit card information we obtain from users and will collect, process, and store such credit card information obtained from payment transactions for business purposes only, which include the payment of fees for trainings and programs.

All credit card information provided to FHE is only accessed by our employees when there is an appropriate business reason to do so, such as processing refunds back to the credit card or charging payments. FHE safeguards all credit card information by maintaining physical, electronic, and procedural standards that employees are required to follow in order to protect such information. In addition to this, FHE uses secure socket layer (SSL) to ensure the security of all credit card transactions made through our website.

FHE does not disclose any private credit card information about current or former users to anyone, except as required by law.

- **Testimonials**

FHE may share personal testimonials on our Website, with your consent and your name alongside it. If you wish to update or remove your testimonial, please contact us at the email address provided in the "[CONTACT US](#)" section of this policy.

B. Reason for Data Collection

All data and personal information collected through our website and trainings is done in order to provide, improve, and protect our services. As such, any information collected through our website may be used for the following purposes:

- To improve website and customer service based on user feedback;
- To detect fraud or abuses of our website (in cases where IP addresses are collected);
- To process payment transactions (for business purposes only, which includes the payment of fees) and provide users with information, products, and services they request on our website;
- For communication purposes, such as periodic emails and emails pertaining to online orders;
- To allow users to participate in online content, access and/or download materials, and use any of the interactive features on the website; and
- To fulfill any other purpose for which you provide it or with your consent.

C. Third Parties with Whom We May Share Your Personal Information

FHE does not sell, trade, or rent your personal information to any third parties. However, we may, in accordance with this Policy, share your Personal Information with the following types of third parties:

- Service providers;
 - This includes our domestic training coordinators, international training organizers, training assistants, and faculty members who work as employees or contractors for FHE. This also includes CVENT (our event management software), Salesforce, Hellosign, Dropbox, and our Merchant Services and Stripe accounts.

- Students attending our professional trainings, but only as it pertains to contact information of other training participants and only to the extent of which such information is listed on rosters during the course of the training; and
- Dr. Peter A. Levine & the Ergos Institute, but only as it pertains to information disclosed at clinical demonstrations during master classes and case consults (Dr. Levine is the founder of the Somatic Experiencing® approach and of the Ergos Institute).
 - In the case FHE becomes insolvent, bankrupt, ceases business, becomes the subject of any other proceedings for the settlement of its debts, or otherwise commences dissolution or liquidation of its business, the following materials will be transferred into Dr. Levine’s possession, as agreed by the parties by written agreement in December of 2015:
 - All mailing lists in FHE’s possession; student, contributors, trainers, and employees’ contact information; and a list of suppliers, personal session providers, individual case consultation providers, and group case consultation providers.

We may share your Personal Information with such third parties for the following purposes:

- In order for such third parties to provide services to training attendees;
- For purposes of verifying identity and/or correcting training attendees’ personal information for communication purposes related to the provision of services; and
- In the case of Dr. Levine, in order to conduct clinical demonstrations and case consults for master class attendees and assistants, all of which have consented to have such information shared and are bound by a confidentiality agreement to not disclose any information introduced during master classes.

FHE will take reasonable steps to ensure that third parties receiving personal information are subject by contractual obligations to comply with this Policy.

D. Opt Out and Choice

In connection with our use of your personal information for communication purposes, you have the choice of opting out and/or unsubscribing from FHE’s emails and mailing lists. You may also request to be removed from our database at any time and we will respond to such requests as soon as is reasonably possible. To submit such requests, please send an e-mail to the email address provided below under the section of this Policy entitled [“CONTACT US.”](#)

E. Demo Library Users: Accessing and Correcting Your Information

If you are a registered user of our Demo library, FHE will store your username. You can update your billing and personal information and change your password by logging into your account. If you need to reset your password, edit or delete your username and account, please email medialibrary@traumahealing.org.

II. PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS

A. Accessing, Correcting, or Updating Your Personal Information

You have the option to review and/or request changes to your Personal Information collected by FHE. If you would like to do so, please submit a written request providing sufficient identifying information to FHE at either the mailing address or email address provided below in the section entitled [“CONTACT US.”](#)

B. Do Not Track Disclosures

Currently FHE does not respond to browser “Do Not Track” signals.

C. Cookies

FHE uses cookies on our website, which enables the site to recognize your browser and capture and remember certain information, such as traffic and site interaction. FHE uses cookies to detect fraud and other abuses to the website. If you prefer, you can choose to turn off all cookies via your browser settings or have your computer warn you each time a cookie is being sent.

III. ADDITIONAL PROVISIONS RELATING TO EU-U.S. AND SWISS-U.S. PRIVACY SHIELD FRAMEWORK

A. EU-U.S. and Swiss-U.S. Privacy Shields

FHE complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (collectively the “Frameworks”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union and Switzerland to the United States, respectively.

FHE has certified that it adheres to the Privacy Shield Principles (as defined below). If there is any conflict between the policies in this Policy and the Privacy Shield Principles, Privacy Shield Principles shall govern. To learn more about the Privacy Shield program and to view our certification page, please visit <https://www.privacyshield.gov/>.

The U.S. Federal Trade Commission has investigative authority and enforcement jurisdiction over FHE’s compliance with the Frameworks.

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles (collectively, the “Privacy Shield Principles”), FHE commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Policy should first contact FHE at the address provided below under the section of this Policy entitled [“CONTACT US.”](#)

FHE has also committed to refer unresolved privacy complaints to the EU Data Protection Authorities (“EU DPA’s”) and the Swiss Federal Data Protection and Information Commissioner (“FDPIC”) under the EU-U.S. and Swiss-U.S. Privacy Shield Principles.

Under certain limited conditions, and as a last resort, EU and Swiss individuals with unresolved complaints may invoke binding arbitration before a Privacy Shield Panel.

B. Data Security

FHE takes commercially reasonable efforts, precautions and proactive measures to protect your data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. However, FHE cannot guarantee the security of Personal Information on or transmitted via the Internet, since no internet or e-mail transmission is ever fully secure or error free.

C. Onward Transfer

FHE does not share your Personal Information to any third parties except to fulfill the purposes for which the information was disclosed or for the purposes outlined in this Policy. For more details, see the sectioned of this Policy entitled [“Third Parties with Whom We May Share Your Personal Information.”](#)

With respect to any Personal Information related to EU or Swiss individuals, FHE will only provide such information to third parties as permitted by the Privacy Shield Principles and our relevant contracts with our vendors and independent contractors providing us such Personal Information. We will ensure that any third party receiving such Personal Information from us has entered into a written agreement with FHE requiring that such third party provide at least the same level of privacy protection as the Privacy Shield Principles.

FHE is responsible for the processing of Personal Information pertaining to EU and Swiss individuals that it receives and subsequently transfers to a third party acting on its behalf. FHE remains liable under the Privacy Shield Principles if any such third-party processes such Personal Information in a manner inconsistent with Privacy Shield Principles, unless FHE can prove that it is not responsible for the act or event giving rise to the damage.

D. Access

EU and Swiss individuals have the right to access their Personal Information upon written request to the address provided in the [“CONTACT US”](#) section of this Policy below. FHE will allow individuals to amend, correct or delete any of their Personal Information in its possession that it is inaccurate or processed in a manner inconsistent with this Policy. Please be aware that individuals wanting to access their information will need to provide sufficient identifying information.

In addition, FHE retains limited registration information related to services provided (e.g. name, contact, and training history) as long as the student is active or as needed to provide services, as well as for accounting, audit, and compliance purposes.

E. Data Integrity & Limitations on Data Use

FHE shall only process and use Personal Information in a way that is compatible with and relevant for the purpose for which it was provided. To the extent necessary for those purposes, FHE shall take reasonable efforts to ensure that Personal Information in our possession is accurate, complete, current and reliable for its intended use.

F. Opt Out & Sensitive Personal Information

In accordance with this Policy and Privacy Shield Principles, and except in connection with transfers to third parties performing tasks directly on our behalf and pursuant to specific instructions, where FHE receives Personal Information directly from an EU or Swiss individual to which such Personal Information pertains, we will offer the individual the opportunity to choose (“opt out”) (1) whether such information is disclosed to a third party; or (2) used for a purpose other than the purpose for which consent was provided. Anyone wishing to opt out can do so by contacting FHE at the contact provided below under the section of this Policy entitled [“CONTACT US.”](#)

Where FHE receives Personal Information regarding the EU and Swiss individuals directly from a third-party vendor or independent contractor (and not the individual to whom the Personal Information relates,) we will cooperate with our third parties reasonable requests to:

- Assist them in informing the impacted individuals about (a) the possibility that we may disclose such individuals’ information to third parties and (b) the individual’s ability to opt out of such disclosures (except for disclosures to third parties performing tasks directly on our behalf and pursuant to our instructions); and
- Reasonably ensure that FHE processes the information for purposes compatible with those for which it was originally collected or subsequently authorized by the impacted individuals.

Our vendors and/or independent contractors will then inform FHE if any such individuals have opted out of such disclosures.

With the exception of mental health/trauma history in a select number of our programs (see paragraph below for detailed information), FHE does not intend to receive any SENSITIVE PERSONAL INFORMATION (which may include information relating to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the sex life of the individual, ideological views or activities, social security measures pertaining to an individual, or administrative or criminal proceedings and sanctions). We also do not intend to share any such Sensitive Personal Information with third parties. Neither our vendors or independent contractors nor any individuals should provide any Sensitive Personal Information to us.

- **Information Collected Regarding Mental Health/Trauma History**

We collect mental health/trauma history of select students who explicitly consent to share such information in some of our master classes and advanced I & II programs for use in the demonstrations (“demos”) part of the training only. The purpose of such information is to provide students with an additional learning tool, so they can observe the application of the concepts being taught. Students are given the option of whether to disclose mental health/trauma history information and potentially be chosen for the demo. Every student present where any such information may be introduced is also bound by confidentiality agreements to not disclose any such sensitive information that may be potentially introduced during these events. All such information, whether or not introduced, will be disposed by the faculty member at the conclusion of each training event.

G. Verification of Privacy Shields

FHE has undertaken a self-assessment verifying that this Policy conforms to Privacy Shield Principles and will continue to undertake annual self-assessments to verify that this Policy remains compliant to Privacy Shield Principles and Framework.

H. Exceptions to Privacy Shield Principles

Please be aware that, as it relates to Personal Information pertaining to EU and Swiss individuals, there are certain exceptions to the Privacy Shield Principles. For example, FHE’s adherences to the Principles may be limited to the extent necessary to comply with national security, public interest, or law enforcement requirements. Please note that where an exception applies to the Privacy Shield Principles, we may make use of such exception.

IV. THIRD PARTY LINKS

We may occasionally offer third party products or services on our website. Please be aware that these third-party sites have separate and independent privacy policies and therefore FHE has no responsibility or liability for the content and activities of these linked sites.

V. LEGALLY REQUIRED DISCLOSURES

Please be aware the FHE may be required to disclose Personal Information pursuant to lawful requests (including subpoenas, warrants, and court or government agency orders) made by public authorities or as otherwise required by law.

VI. CONTACT US

If you have questions or concerns about FHE, our Services, and/or Privacy Policy, please contact us by email at legal@traumahealing.org or by mail at the following address:

Somatic Experiencing Institute
5303 Spine Rd. #204,
Boulder, CO 80301

VII. CHANGES TO OUR PRIVACY POLICY

FHE reserves the right to amend this policy from time to time. In the event changes are made, we will update the Privacy Policy modification date below. If a revision meaningfully reduces your rights, we will notify you by email so long as you are still on our mailing list.

This policy was last modified on June 10th, 2020.