

Privacy Policy

On May 24, 2018, Choi Kwang Do Martial Arts International (CKDMAI) created a Privacy Policy for its main website. The revised Privacy Policy of September 6, 2019 explains: who, how, where, when, and why we handle data gathered in our operations; it specifically discloses the ways in which we gather and use Personal Information. It also fulfills a legal obligation/requirement to protect the privacy of our members through transparency and integrity. This policy is part of our continued commitment to transparency, using simple-to-understand language, and ensuring you always have control over your data. We've included provisions that clarify our efforts to comply with the European Union's (EU) General Data Protection Regulation ([GDPR](#)) effective May 25, 2018. The GDPR is a regulation that requires companies to protect the personal data and privacy of residents of EU countries. The GDPR supersedes the Data Protection Directive from 1995 and restricts the way businesses collect, store and export/protects people's personal data. Therefore, we are providing this policy to explain our privacy practices and the choices you can make about the way your Personal Information is collected and used. Moreover, CKDMAI is leading the way in how martial arts organizations pay special attention to its member's privacy and use of Personal Information. Not only are we conforming to the GDPR, but we are the first martial arts organization to go worldwide with these changes; rather than enabling these rights only for European members, CKDMAI will provide these regulations to all members because we believe that the GDPR establishes important principles that are relevant globally. Because one of our most important principles is integrity, it is important that we emphasize the honesty, good character, decency, fairness and trustworthiness of our organization on behalf of its members.

BY USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS ONLINE PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS ONLINE PRIVACY POLICY, DO NOT USE THE WEBSITE OR SUBMIT PERSONAL INFORMATION TO US IN ANY MANNER.

CKDMAI, its affiliates, employees, and agents are very sensitive to the privacy concerns of its members and visitors to its site on the Internet. This Privacy Policy outlines the types of Personal Information that you may provide to us on any website controlled by CKDMAI which link to this Privacy Policy (referred to, individually and collectively, as the "Website") and explains how CKDMAI handles such Personal Information. This Privacy Policy does not apply to websites that do not link to this Privacy Policy or to third-party websites to which the Website may link. Your use of this Website is subject to the Privacy Policy and the applicable Website Terms and Conditions.

Changes to the Privacy Policy

We may modify this Privacy Policy at any time, but we will provide notice of any material or non-material changes to this Policy, such as posting a notice through the Website or via Email to provide you with the opportunity to review the changes and to choose whether to continue using the Services. Your continued use of our Services means that you consent to the updated Privacy Policy. CKDMAI will post those changes and always update the revision date at the end of the Policy, so users will always know what information we collect online, how we use it, and what choices you have concerning your Personal Information.

How Does This Privacy Policy Affect You?

Nothing about your current CKDMAI experience changes; we just want you to clearly understand that we always put your privacy first, which is a top priority. CKDMAI is committed to being a good steward of your Personal Information, handling it in a responsible manner, and securing it with administrative, technical, and physical safeguards. We also believe in being honest, direct and transparent when it comes to your data. CKDMAI's use of your personal information in the student database is *not* contingent upon consent of this Privacy Policy or the Terms and Conditions of the Website.

Definition of "Personal Information"

"Personal Information" means information that identifies any visitor/ member or could reasonably be used to identify such entities and which is submitted to and/or collected and maintained by CKDMAI in an accessible form, and includes information actively submitted by you. Personal Information is information that can identify you, such as your student ID number, your name, birth year, phone number, email or postal address, or it may be information that could reasonably be linked back to you, including archived information.

Under the GDPR's guiding laws/principles, you have a right to 1) be informed of how we use and process your personal data, 2) you have the right to access it, 3) the right to correct it, 4) the right to erase it (the right to be forgotten), 5) the right to restrict how it is used, 6) the right to transfer it, 7) the right to object as to how it is being used and 8) the right to not be profiled. You also have a right to request access to your personal information, to receive an accounting of how that information has been used and disclosed, subject to certain exceptions prescribed by law.

At CKDMAI, we collect process and store CKD member's Personal Information in our main database, and each school owner has use of this database, as do student members so that they may use our websites, and services. This Privacy Policy describes our practices for collecting, storing and processing your Personal Information, the type of student data we use, the controls we provide you to manage it with, and our security policies that protect your Personal Information.

CKDMAI BASIS FOR PROCESSING OF PERSONAL DATA AND CONSENT

According to the GDPR, Art. 6, "Lawfulness of Processing," there are three basic pieces of information that CKDMAI needs for Consent purposes: 1) Who is doing the processing, 2) The purpose of the processing and 3) What we will be doing with the data. Our CKDMAI Data Controller and Data Processor is Linda Choi. The Data Controller determines the purpose(s) for which and the manner in which any Personal Information are, or are to be, processed/held. The Data Process Officer processes the information on behalf of the Data Controller. CKDMAI collects personal information from you only when we need your personal information to perform our contractual obligations to you; the processing of this information is in both of our interests so that we may deliver the services you have requested as a member of CKMAI. We store data until it is no longer necessary to provide our services, and we do not sell, market or transfer our members' personal information. Under the GDPR, Article 23 calls for "controllers to hold and process only the data absolutely necessary for the completion of its duties (data minimisation)." For minimization purposes, we only collect the personal data we actually need for our specified purposes, we have sufficient personal data to properly fulfill these purposes, and we periodically review the data we hold, and delete anything we don't need; we also keep personal data accurate and up to date and most important, we keep our data secure.

Art. 6 GDPR Lawfulness of Processing: Each Membership Agreement should include a Disclosure Statement which reveals why, how, and for how long a members' Personal Information will be held. This agreement is to be signed by the member before a Contract is processed and entered into the Database. The processing shall be lawful only if and to the extent that at least one of the following applies: 1) the member has given consent to the processing of his or her personal data for one or more specific purposes, 2) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract and 3) the processing is necessary for compliance with a legal obligation to which the controller is subject. For schools in the U.S., each School Owners enters your Personal Information into the Database. For schools abroad, each School Owner enters your Personal Information into the Database. Therefore, although CKDMAI has your information in the Database, each individual School Owner, both domestic and abroad is responsible for maintaining your Personal Information responsibly. Therefore, it is up to each School Owner/Affiliate to train any staff handling personal data and their data protection responsibilities, and to use awareness to remind staff about keeping data safe and secure. If you have any questions related to the processing of Personal Information and/or procedures, please contact linda@choikwangdo.com

How CKDMAI Collects, Stores, Processes, Shares or Archives Personal Information

Our main website at www.choikwangdo.com is hosted by GoDaddy.com and is used for informational purposes for those who are interested in learning about the Art of Grand Master Kwang Jo Choi at one of the many affiliated schools world-wide. Affiliated schools listed [here](#) are schools that are independently operated and not owned by CKDMAI and subject to the rules and regulations governing business practices in their own locale.

www.choikwangdo.com uses cookies. Many websites use cookies, and in some cases, a website will not display information unless you have cookies turned on in your browser. We highly recommend everyone to become very familiar with the browser you use for visiting websites since cookies can be both good and bad. With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before cookies are stored. You can learn more about cookies and how they are used on the U.S. Federal Trade Commission's (FTC) website [here](#). The FTC also provides answers to common questions on responding to "Do Not Track" and 3rd party providers [here](#). Other similar technologies may be used by third parties, such as IP addresses, browser software, and may utilize web stats, to collect information over time and across third party websites to support their site's functionality, and to improve user experience. Please refer to your browser instructions or help screen to learn more about these functions.

What Information Does CKD Collect From You?

The following personal information below describes what we collect from you to provide services as a member in the student database. As stated above, we refer to this as your "Personal Information." Everything starts with your Student Membership Agreement; we need particular information in order to process your agreement and then your Personal Information is entered into our database. We collect your Name, ID Number, Enrollment Date, Expiration Date, Pin Number, Student Status, Birth Year, Gender, whether an adult/child, Postal Address, Email address, and Phone Number.

How Does CKDMAI Store Your Personal Information?

The Choi Kwang Do student database is hosted by Greater Atlanta Hosting ([GAH](#)) at <https://choikwangdo.net/student/login.php> in a private, secure database accessible to active

members only within Choi Kwang Do; here Students have access to their data and certifications via the student login. If you are an active Choi Kwang Do student, your School Owner is the person you need to contact for your password to access your student profile. Affiliated School Owners use the database for maintaining membership information required for student and instructor certifications. Because the affiliated School Owner is the person that enters and maintains student data, they are responsible for providing your student number and password to access your Personal Information and student history. If you are an inactive student, your first point of contact would be the School Owner of the locale where you attended Choi Kwang Do. If you are not able to get in touch with that person then you can email linda@choikwangdo.com for assistance. Additional contacts and their roles are provided at the end of this Privacy Policy.

Note: The student database site does *not* use cookies for tracking. However, from time to time, if there is a seminar/event registration in progress, the site will use a session id to collect data for the seminar. The information collected will include an invoice number, name, student id, age and amount for event purposes only. This information will then be passed to authorize.net for the user to input credit card information for payment. Information will then be returned to www.choikwangdo.net from authorize.net regarding success on the charge.

Social Media Sites

CKDMAI utilizes social media sites so that our members may share ideas, photos, videos posts, and to inform other members about online or real-world activities and events with people in our network. Our social media sites are hosted by their respective networks, but are officially approved by CKDMAI. These sites are maintained by Master Guy-Roger Nzamba. The sites are: [CKDMAI Facebook](#), [CKDMAI YouTube](#) and [CKDHQ Twitter](#). If you have any questions about the content of these sites, please email Master Nzamba at: nzamba@choikwangdo.com Please see Facebook, YouTube and Twitter for their respective Privacy Policy and Terms of Conditions for how they may use your interaction with their services.

Why Does CKDMAI Process Your Personal Information?

We process your Personal Information on the basis of contractual necessity to perform services for you. For example, we process your information in order to update your student profile as you progress through your CKD program, update certifications, your status, etc.

We may also process your Personal Information on the basis of our legitimate interests, such as providing and improving the Services. We have a legitimate interest in providing and developing interesting features to provide to our members, thus, we use your Personal Information to keep our Services safe and secure and to pursue your and our legitimate interests in ensuring that we protect against fraud, spam and abuse. Where we rely on legitimate interests to process your Personal Information, you have the right to object to such processing (meaning that you can ask us to stop). You can also use your Privacy Settings to control certain ways in which we process your data. Finally, you can also contact us, using the details at the bottom of this page to object to other forms of processing.

Legal Basis under EU General Data Protection Regulation for Processing Personal Information of EU Residents

Where you have consented to data processing in your membership agreement, your consent provides the legal basis to process your Personal Information. We rely on your consent to process your Information. Each CKDMAI Affiliate is responsible for ensuring that they are *compliant* with the EU-GDPR. Moreover, each CKDMAI Affiliate should ensure that they protect the personal information/data of their *own* schools and students, both at home and abroad. CKDMAI is *not* held responsible should an Affiliate fail to comply with the rules and regulations of the GDPR in their respective EU country. The US has its own protection regulations at the

state, national and federal level, most notably in the Privacy Bill of Rights, through each States Codes/laws/regulations and through the Federal Trade Commission (FTC). Although CKDMAI is exempt from registration with the Information Commissioners Office (ICO), we believe that it is important that our organization adhere to the principles of the GDPR and we understand the best practices for managing information and data flows. CKDMAI will be continuously updating our database/website to ensure you understand CKDMAI's Terms and Conditions, this Privacy Policy and most important, your rights as concerns the use of your Personal Information under the regulations of the GDPR. This Privacy Policy will be updated on the website as we progress to reflect these changes and you will be notified via email of these changes.

When Do We Share Your Information?

CKDMAI does *not* share your personal information with third-parties; your personal information will not be sold, marketed, *transferred* or otherwise disclosed to anyone other than authorized recipients, except where disclosure is required by law. In all instances, the information will be used only for the purposes stated in this policy.

Links to Other/Third Party Websites

Our main Website may contain links to websites operated by others. To the extent that any of the sites accessible through our site have different practices, those practices will be applicable at those sites. CKDMAI is not responsible for the practices, policies or content applicable to these third party sites. Inclusion of a link to another site does not imply endorsement by CKDMAI. You should consult the respective Terms and Conditions and Privacy Policies of these third-party sites for more detailed information on their practices as well as for instructions about how to opt-in or opt-out of certain practices. This Privacy Policy does not apply to third party providers and we cannot control the activities of other advertisers or websites.

Notwithstanding any content on the Website indicative of the contrary, CKDMAI makes no endorsement of or representation about any such websites, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any website linked to in this Website such as social/business networking sites, you do so entirely at your own risk. CKDMAI does not guarantee that you will receive an alert when you leave the Website, and it is your responsibility to determine when you have left the Website. CKDMAI assumes no responsibility for and shall not be liable for policies of any third party websites, any damage to, or viruses that may infect your computer equipment or other property, or for any loss or corruption of data resulting from any third party websites navigated to or accessed from links hosted on or contained in our Website.

Why Do We Retain/Archive Your Personal Information?

CKDMAI keeps your personal information so that we have records of your time with the organization as a member, and so that we may continually give you access to our services and to keep track of your certifications and status as a CKDMAI member. Archive data consists of older data that is still important to the organization and may be needed for our/your future reference. CKDMAI archives personal information that is no longer actively used. For members who have been archived, their personal data will have been wiped clean except for student number, name, and certificate history. Specifically, CKDMAI archives contain primary source information that has accumulated over the course of a member's time in order to show the function of your time within the organization. CKDMAI will retain the Personal Information until such time as you ask us to close/delete it.

Consolidation of Personal Information

CKDMAI does *not* consolidate the Personal Information of members who use the Website/Database, nor does it use its member(s) information for marketing and/or research

activities. Personal Information is only utilized to facilitate our business functions as noted above.

Limitations on Collection of Personal Information

You may always limit the amount and type of actively-transmitted Personal Information that CKDMAI receives about you by choosing not to enter any Personal Information into forms or data fields on the Website/Database. However, some online services, such as the student database can only be provided to you if you provide appropriate Personal Information such as your identification number and password.

Personal Information Related To Children: A Note for Parents or Legal Guardians

Consistent with the Children's Online Privacy Protection Act and the EU GDPR, CKDMAI is committed to protecting children's privacy on the Internet. CKDMAI does not intend to, or knowingly, collect, use, or disclose Personal Information (including online contact information) of children under the age of 18 with the exception of membership purposes, and we encourage parents or guardians to supervise their children's online activities and to consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing online their names, addresses and other personal information without your permission. If CKDMAI becomes aware of a child under the age of 18 attempting to register on the Website, we will not accept the registration. Once CKDMAI becomes aware of a child under the age of 18 providing Personal Information, we will attempt to delete that information. If your child has provided Personal Information, please contact us so it can be deleted. It is up to each school/Affiliate to ensure that they follow the laws of the age of consent for children in their respective jurisdictions. If you are processing data of a child under 18, check to make sure the child is a party to the contract and they have the necessary competence to enter into a contract and check the age of consent in your specific jurisdiction which can help you to demonstrate that the child's rights and interests are properly considered and protected.

Security of Personal Information/Database/Website

CKDMAI makes an effort to ensure that Personal Information is protected while you are on the Website. However, the confidentiality of Personal Information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting Personal Information over the internet. CKDMAI cannot guarantee that unauthorized third parties will not gain access to Personal Information; therefore, when submitting Personal Information to any Website, you must weigh both the benefits and the risks. However, CKDMAI maintains a strong security protocol that we follow to protect against malware, viruses and database breaches. Our sites are secured with SSL, a firewall, general anonymization, and stringent encryption codes in order to protect our members Personal Information. If you have any questions about our security protocol, please contact our Data Controller at linda@choikwangdo.com

Data Breaches

The EU-GDPR and U.S law introduces a duty on all organizations to report certain types of personal data breaches to the relevant supervisory authority. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, you must inform those individuals without undue delay. Under the GDPR, breach notifications are now mandatory in all EU member states where a data breach is likely to "result in a risk for the rights and freedoms of individuals." This must be done within 72 hours of first having become aware of the breach. Data processors are also required to notify their customers, the controllers, "without undue delay" after first becoming aware of a data breach. Georgia, in an effort to protect individuals from the growing threat of identity theft caused by data breaches, passed the Georgia Personal Identity

Protection Act in 2005 ([GPIPA](#)) and 2006 Georgia Code 10-1-912, which covers “persons or businesses that maintain computerized data on behalf of an information broker or data collector.” Each school in the U.S. and Affiliates abroad should ensure that they have robust breach detection, investigation and internal reporting procedures in place and data breach instructions should be posted in each school. This will facilitate decision-making about whether or not you need to notify the relevant supervisory authority and the affected individuals. You must also keep a record of any personal data breaches, regardless of whether you are required to notify the ICO. CKDMAI Headquarters has put a Breach Notification policy in place, thereby maintaining solid protection when it comes to the security of personal information/data. For a current list of all US Data Protection Laws effective 2019, please see this [link](#). If you have any questions, please email us at linda@choikwangdo.com

Your Choices and Access to Your Personal Information

You have a right to request access to your Personal Information and to be provided with a copy of certain information you provided by using the tools described below in each section or by contacting your School Owner, or the Data Controller and Data Processor at linda@choikwangdo.com

The details and options for accessing this information are listed below. As stated above, you have a right to access your Personal Information, the right to correct it, the right to erase it (the right to be forgotten), the right to restrict how it is used, the right to transfer it, the right to object as to how it is being used and the right to not be profiled. The following sections provide you with specific information as to how to go about utilizing these rights.

How Do I Gain Access To My Profile/Student Information?

You should have a Membership/License Card with your ID Number and you should have a Password set up for your account when you became a member. If you do not have this card/information, please contact your School Owner. Students are members of Affiliated Schools/Owners who are affiliated with CKDMAI and not Headquarters (HQ). You must gain access to your information from your School Owner. If you contact HQ, we will contact your School Owner to give them access for security reasons. If you are under the age of 18, please refer to your Parents/School Owner.

How Do I Correct My Personal Information?

You can correct your Personal Information in a number of ways. First, by gaining access to your profile as noted above, however, only School Owners or School Administrators appointed by the School Owner, and HQ can edit student information. Please refer to your School Owner first.

How Do I Erase/Delete (The Right to be Forgotten) My Personal Information?

Students cannot delete their entire record, only HQ can do this since this would result in your complete history being deleted; at this point we would not be able to follow/add to your progress as a CKDMAI member and would have no proof of your status/certification.

If you require assistance deleting your Personal Information, please submit a “Deletion Request” to HQ at: linda@choikwangdo.com

How Do I Restrict My Personal Information?

Student Certification is linked to your Student Number. Currently, the minimum Personal Information needed to keep your Profile updated for contractual/progress purposes is your Student Number, which is system generated and not changeable, your Pin Number, which is system generated (but changeable by you, and your School Owner), your First and Last Name, your Year of Birth, your Gender, and whether you are a Adult/Child. For Dan Certifications, we retain use of your Name, Rank, Certificate Number, and Date of Certification. Additional Personal Information such as your Address, Phone and Email are not mandatory, however, it would be difficult to contact you without access to one of these fields of information. Affiliated Schools are required to maintain at the minimum: your Name and Birth Year for the submission of Certificates and Instructor Certifications. If you have any further questions, please contact your School Owner.

How Can I Transfer (PORT) My Personal Information?

Students cannot personally transfer their record to another school. However, a School Owner can transfer a student to another school. If a school owner archives a student, then any school owner has access to add that student to his school. If you need your record transferred, please speak with your School Owner.

How Can I Object to How My Personal Information Is Being Used?

You can object to how your Personal Information is being used by contacting the Data Controller at linda@choikwangdo.com. The Data Controller is responsible for how and why your Personal Information is used for contractual obligations as a CKDMAI member.

How Do I know I Am Not Being Profiled? CKDMAI *never* profiles its members. We no longer use nationality and age on Dan Certificates. We only use your Name, Rank, Certificate Number, and Date of Certification.

Acceptance of Privacy Terms and Conditions

Your access to and use of the Website is subject to this Privacy Policy and all applicable laws. By accessing and browsing this site, you accept, without limitation or qualification, this Privacy Policy. CKDMAI reserves the right to at any time revise this Privacy Policy to reflect technological advancements, legal and regulatory changes and good business practices. If CKDMAI changes its privacy practices, a new Privacy Policy will reflect those changes and the effective date of the revised Privacy Policy will be set forth in this Privacy Policy with the Revision number at the end of the Policy. You are bound by any such revisions and should therefore periodically visit this page to review the current Privacy Policy and Terms and Conditions. If you have any questions about the Terms and Conditions and Privacy Policy, or the EU-GDPR, please see our contact information below.

In all email communications to CKDMAI, please include the e-mail address used for registration (if applicable), the website address or the specific program to which you provided Personal Information and a detailed explanation of your request. If you would like to delete and/or object to your Personal Information and are contacting us by e-mail, please put your Name, and "Deletion Request," or "Objection Request," as applicable, in the subject line of the e-mail. We are required by law to respond to your requests within 30 days.

Official Correspondence Can Be Sent Via Postal Mail To:

Choi Kwang Do Martial Arts International

Attn: Linda Choi

4327 Wade Green Road

Kennesaw, Georgia 30144

Official Correspondence Can Be Sent Via Email To:

linda@choikwangdo.com

If you reside within the United States: Your respective School Owner is your Data Controller/Data Processor and is responsible for the use of your data and for responding to any requests related to your Personal Information.

If you reside outside the United States: Your respective School Owner is your Data Controller/Data Processor and is responsible for the use of your data and for responding to any requests related to your Personal Information.

Identity / Contact Details of the Data Controller and Data Process Officer

The Data Controller determines the purpose(s) for which and the manner in which any Personal Information are, or are to be, processed/held. The Data Process Officer Processes the information on behalf of the Data Controller.

Contact of Data Controller and Data Process Officer: Linda Choi

Phone: +1 (770) 795-0010

Email: linda@choikwangdo.com

Identity / Contact Details of the EU Legal/ Privacy Consultant: Deborah Cotton

Email: dcotton@choikwangdo.net

**This Privacy Policy is effective as of September 6, 2019.
Revision 2.0**