



## PRIVACY POLICY

Somatic Experiencing® International (“SEI”) is dedicated to supporting trauma resolution and resilience through culturally responsive professional education, training, research, and outreach in diverse global communities.

In the conduct of business, we may obtain information that is personal to individuals. As an organization committed to protecting the privacy of users, SEI 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 (“Policy”), “personal information” refers to 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 are committed to maintaining the confidentiality of personal information we collect in accordance with this Policy.

### I. General Policy

#### A. Information Collection & Use

SEI 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 apply and/or register for a training, SEI stores and uses your personal information to (1) verify completion of each training module; (2) eligibility to become a member of SE™ International; and (3) eligibility to attend trainings. To prevent contact information confusion, SEI strongly encourages applicants and students to use the same email address throughout the training. 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 SEI through the provider themselves. Session and Consult Providers are placed on this list for the purpose of students finding providers to complete their SEP™ Requirements.
  - o Session Providers and Consult Providers may opt out from the list by contacting Assisting via the contact form on the website, 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, SEI 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
    - SEI 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

SEI does not collect or store any credit card details on our servers where they can be accessed. For transactions involving credit card payments, we utilize trusted third-party services listed in Exhibit A such as Stripe, which handles the payment processing. When you make a payment, you are directly inputting your credit card information into a secure payment gateway via Salesforce. SEI therefore does not have access to your credit card information on our servers.

SEI 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, SEI uses secure socket layer (SSL) to ensure the security of all credit card transactions made through our website.

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

- Testimonials, Evaluations, Surveys, and other feedback

SEI 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 [CONTACT US](#).

- Sensitive Personal Information

With the exception of mental health/trauma history in a select number of our programs (see paragraph below for detailed information), SEI does not intend to receive any SENSITIVE PERSONAL INFORMATION (which may include information including but not limited to: medical history, political beliefs, or any information regarding social security history). Neither our vendors nor independent contractors nor any individuals should provide any Sensitive Personal Information to us.

- Information Collected Regarding Mental Health/Trauma History



SEI collects mental health/trauma history of select students who explicitly consent to share such information in some of our trainings and workshops 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 not 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.

#### B. Reason for Data Collection

All data and personal information collected through our website and trainings is done in order to provide, protect, and better 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 and provide users with information, products, and services they request);
- For communication purposes, such as periodic emails;
- 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

SEI 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 SEI. This also includes but is not limited to HelloSign, Dropbox, and our Merchant Services and Stripe accounts. The list of programs utilized by SEI to collect information is provided in Exhibit A below.
- 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;
- Dr. Peter A. Levine & the Ergos Institute, but only as it pertains to information regarding a student’s ability to attend a master class, or 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 SEI 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 SEI'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.
    - For purposes surrounding Ethical Grievances as it pertains to SEI's [Code of Ethics](#).
    - For venues that require a list of vaccine-exempted students due to their COVID policy.

SEI 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 SEI'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 use the contact form on SEI's website and select to contact Program Support.

#### E. Demo Library Users: Accessing and Correcting Your Information

If you are a registered user of our Demo library, SEI 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 contact our Marketing Department through the contact form on the webpage.

## 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 SEI. If you would like to do so, please submit a written request providing sufficient identifying information to SEI at either the mailing address or via the contact form on SEI's website.

### B. Do Not Track Disclosures

Currently SEI does not respond to browser "Do Not Track" signals.



### C. Cookies

SEI 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. SEI 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. You can view our Cookie Policy on our website.

### A. Data Security

SEI 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, SEI 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.

- In the event of a data breach:
  - In the event of a data breach that poses a significant risk of harm to your personal information, SEI will promptly notify you in accordance with applicable laws and regulations. We will make reasonable efforts to provide notification within three (3) business days after becoming aware of the breach.
  - SEI will take immediate action to investigate the breach, determine the extent of the unauthorized access or disclosure, and implement necessary measures to mitigate any potential harm to affected individuals. SEI will work diligently to prevent any further unauthorized access and ensure the security of your personal information.
  - If required by applicable laws or regulations, SEI will cooperate with relevant authorities, including data protection authorities, in investigating the data breach and providing necessary information.
  - SEI will provide you with clear and concise information about the nature of the breach, the types of personal information affected, and any recommended actions you should take to protect yourself from potential harm. Additionally, SEI will offer support and guidance to assist you in addressing any concerns or questions you may have related to the breach.
  - While SEI takes extensive measures to prevent data breaches, we cannot guarantee absolute security. Therefore, SEI disclaims any liability for damages or losses incurred as a result of a data breach, except where prohibited by applicable law.

### B. Onward Transfer

SEI 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 section of this Policy entitled "Third Parties with Whom



## We May Share Your Personal Information.”

### C. Access

SEI allows individuals to amend, correct or delete any of their Personal Information in its possession that 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, SEI retains limited registration information related to services provided (e.g. name, contact, and training history) as long as the student (also assistant, coordinator, faculty, organizer, member, provider) is active or as needed to provide services, as well as for accounting, audit, Continuing Education, and compliance purposes.

### D. Data Integrity & Limitations on Data Use

SEI 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, SEI shall take reasonable efforts to ensure that Personal Information in our possession is accurate, complete, current and reliable for its intended use.

### E. Opt Out & Sensitive Personal Information

In accordance with this Policy, and except in connection with transfers to third parties performing tasks directly on our behalf and pursuant to specific instructions, 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 SEI at the contact provided below, or by using SEI’s contact form on the website.

Where SEI receives Personal Information regarding EU 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 SEI 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 SEI if any such individuals have opted out of such disclosures.

## III. 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 SEI has no responsibility or liability for the content and activities of these linked sites.

#### IV. LEGALLY REQUIRED DISCLOSURES

Please be aware the SEI 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.

#### V. CONTACT US

If you have questions or concerns about SEI's Privacy Policy, please contact us through the contact form on our website, or by mail to the following address:

Somatic Experiencing International

P.O. Box 7240  
8800 W. 116<sup>th</sup> Circle  
Broomfield, CO 80021

#### VI. CHANGES TO OUR PRIVACY POLICY

SEI 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 September 15, 2023.



## EXHIBIT A

Programs utilized by SEI that obtain and/or share information with SEI:

- BlackThorn
- Dropbox
- Formstack
- HelloSign
- Mailchimp
- Microsoft Office
- OneTrust
- Quickbooks
- Salesforce
- Social Media Accounts owned by SEI
- Stripe
- Teksoft
- Transworld
- WooCommerce
- Zoom