

# Privacy Policy

## 1 General

1.1 **Nangten Menlang International**, Grosse Pfarrgasse 3/3, 1020 Vienna, Austria (hereafter: NMI), is a non-profit association which, among others, operates the websites [www.tulkulobsang.org](http://www.tulkulobsang.org) and [www.lujong.org](http://www.lujong.org). For this purpose, NMI stores and processes your personal data exclusively in accordance with the applicable provisions of the General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (DSG).

1.2 For better readability, only the masculine form is used in this Privacy Policy, but we would like to expressly state that both genders are of course meant equally.

## 2 Stored Data

2.1 NMI stores and processes the following personal data:

2.1.1 Server log files: In order to optimise the usage of the websites with regards to system performance and user-friendliness for the user as well as to supply helpful information regarding the offers from NMI, the provider of the websites automatically collects and stores information in so-called "server log files" which the user's browser automatically transmits to NMI. This includes the following: internet protocol address (IP address), browser, language settings, operating system, referrer URL, the internet service provider used as well as the date and time of day. These data are not linked with personal data sources. In the case of concrete indications of illegal usage, NMI expressly reserves the right to subsequently examine these data.

2.1.2 **www.tulkulobsang.org**: NMI collects personal data which the user enters when registering or managing his account as well as when booking an event, a program or when purchasing an extraordinary membership or a digital content (e.g. name, address data, e-mail address, phone number, password). In addition, in the case of bookings or purchases, NMI collects certain personal data from external sources such as anonymised credit card information (transaction ID). NMI processes these data in order to process and bill the booking or purchase and to carry out the booked or purchased service. In the event that the booked event is not organised by NMI itself, the data for the processing of the booking, billing or event organisation will be transmitted by NMI to the event organiser and its assistants. In the event that the place of service provision is in a third country (e.g. USA, Brazil), it is necessary for the performance of the contract that the transmitted data is transmitted to the organiser in the third country. All booked events and programs as well as purchased memberships and digital content are stored together with the account. In case that participation in an event or program or the purchase of a membership or digital content is a pre-requisite for booking other events or programs or for purchasing other memberships or digital content, NMI will verify these requirements based upon the data stored with the account. Without disclosing this data, it is not possible to create an account or make a booking or purchase. Generally, these data will be stored until the account is deleted. Excepted from this are data which are required for the fulfilment of statutory obligations and in order to ward off any liability claims.

NMI also collects personal data that is entered when registering as a volunteer, such as name, telephone number and address data. NMI processes these data to coordinate voluntary activities. Generally, these data will be stored until a corresponding deletion request is made. Excepted from this are data which are required for the fulfilment of statutory obligations and in order to ward off any liability claims.

2.1.3 **www.lujong.org**: NMI collects the personal data which the user enters when registering or managing his account (e.g. name, address data, e-mail address, newsletter settings, password, personal customer number, web address of the user, profile information and profile picture of the user). NMI processes, checks and stores these data to ensure that only teachers certified by NMI in the course of its teacher certification programs with active, valid certification are listed on the website and that no profile content is published that violates the NMI website Terms of Use. The user's public profile information can be seen by anyone, including someone who does not have a user account. These data are stored until the account is deleted. Excepted from this are data which are required for the fulfilment of statutory obligations and in order to ward off any liability claims. Without disclosing the following data – name, address data, e-mail address, password, personal customer number, profile picture - it is not possible to create an account and subsequently list as a teacher on the website.

#### 2.1.4 Newsletter

NMI offers a newsletter via e-mail, by means of which you can keep informed upon a regular basis of the following content:

- Information about events, programs and digital content of Tulku Lobsang and NMI
- Information about events, programs and digital content or products regarding the subject areas of Buddhism, Tibetan medicine, meditation or Tibetan culture, also from other providers
- Information about offers and products from the affiliated web shop [www.vajrashop.com](http://www.vajrashop.com)
- Other news regarding Tulku Lobsang and NMI or Buddhism, Tibetan medicine, meditation as well as Tibetan culture

If you subscribe to NMI's electronic newsletter, you thereby consent to the storage of your title, your name and your e-mail address as well as your selected language and regional preference for the purpose of sending the newsletter (Art. 6(1)(1)(a) GDPR). Newsletters are sent via MailChimp (see point 3.4 of this Privacy Policy).

It will be possible at any time for you to withdraw your consent for receiving the newsletter for the future and thus to cancel the newsletter subscription (This is also referenced in the newsletter).

Insofar as you have rendered consents to NMI, you may withdraw them at any time with effectiveness for the future. You may send your withdrawal to NMI by using the following contact data: [office@tulkulobsang.org](mailto:office@tulkulobsang.org). If you would like to use another communication method, then please use the contact information in the "Legal Notice" section. In case that you also have an account on the websites [www.tulkulobsang.org](http://www.tulkulobsang.org) and/or [www.lujong.org](http://www.lujong.org), the storage and the processing of the data provided via the account(s) will not be affected by the withdrawal of the newsletter consent (see point 4 in this regard).

Double opt-in and logging. The registration for the newsletter takes place using a so-called double opt-in procedure. This means that after registering to receive the newsletter, you will receive an email in which you will be asked to confirm your registration. This confirmation is necessary so that nobody can register with someone else's e-mail address. The registrations for the newsletter are logged in order to be able to prove the registration process in accordance with the legal requirements. This includes storing the time of registration and confirmation as well as the IP address. Changes to your data stored at MailChimp are also logged.

2.1.5 Cookies: This website uses cookies in order to design the website to be more user-friendly. A cookie is a small text file which NMI stores on the user's computer or mobile device. Thus, it enables NMI to recognise the user as well as store the selected language. The content of the cookies used is restricted to an identification number which does not enable personal reference to the user.

There are two types of cookies: permanent and temporary (session) cookies. Permanent cookies will remain on the user's device for the purpose of better usability and will permit NMI to recognise the browser during the user's next visit. Temporary cookies will be stored temporarily and will be deleted when the browser session ends.

Cookies can be deleted from the computer or mobile device by changing its browser settings. Moreover, the browser's settings can be adjusted in such a manner that the user is notified of the placement of cookies and that this is permitted only in individual cases. The acceptance of cookies can be prevented for certain cases or generally, and the automated deletion of cookies by closing the browser can be activated. However, if the cookies are deactivated, the functionality of this website may be restricted.

## 3 Usage and Transmission

### 3.1 [www.tulkulobsang.org](http://www.tulkulobsang.org):

Generally, NMI processes the data on its own and does not pass them on to third parties. Excepted from this is the transmission of data to external event organisers (e.g. local Nangten Menlang organisations), educators (for a program) or event partners (e.g. travel agencies for pilgrimages) as well as their assistants for the purposes of the organisation and billing of the event and/or the program. If accommodation is required for the event and booked via NMI, the data for the booking and billing of the accommodation will be transmitted to the lodging establishment.

### 3.2 [www.lujong.org](http://www.lujong.org):

In general, NMI processes the data on its own and does not pass them on to third parties. Excepted from this is the user's public profile information, which can also be viewed by third parties and therefore possibly processed.

3.3 Marketing purposes: Until consent is withdrawn, NMI processes the user's data also for marketing purposes, particularly in order to inform the user about events, programs, memberships, digital content, products and services of NMI and affiliated companies as well as offers from third-party providers regarding Tulku Lobsang or the subject areas of Buddhism, Tibetan medicine, meditation or Tibetan culture. The user may, at any time and free of charge, object to the data processing for marketing purposes by sending an e-mail to: [office@tulkulobsang.org](mailto:office@tulkulobsang.org). In case of an objection, the data will no longer be processed for this purpose.

3.4 MailChimp: The sending of newsletter emails in accordance with point 2.1.4 and partially also the sending of information emails in accordance with point 3.3 takes place via the mailing service provider "MailChimp", a newsletter mailing platform based in the USA. For this purpose, the data required for sending e-mails (such as e-mail address, name as well as language and regional preference) are passed on to MailChimp. MailChimp's privacy policy can be viewed [here](#). The Rocket Science Group LLC d/b/a Mailchimp incorporated the EU's Standard Contractual Clauses ("SCCs") into its [Data Processing Addendum](#) (DPA) which automatically forms part of its [Standard Terms of Use](#) and applies to customer data protected by European data protection laws (including the GDPR).

The mailing service provider is used on the basis of legitimate interests in accordance with Article 6 (1) (f) GDPR and an order processing contract in accordance with Article 28 (3) sentence 1 GDPR.

## 4 User's rights

4.1 The user has the right to request information regarding his or her stored personal data, their origin, their recipients and the purpose of the data processing. The user also has the right to request the correction of, to object to, to request the deletion of or to restrict the processing of data which are incorrect and/or have been processed impermissibly. Moreover, the user has the right at any time to withdraw his or her consent that has previously been issued regarding the usage of his or her personal data by sending a respective e-mail to: [dataprotection@tulkulobsang.org](mailto:dataprotection@tulkulobsang.org). If the consent is withdrawn or an objection is made to this effect, NMI will delete the data as long as NMI is not obliged by law to store them or is entitled to store them for compelling, legitimate reasons of protection.

4.2 The user has the opportunity to submit a complaint to the competent government data protection agency if he or she is of the belief that the processing of his or her personal data violates valid data protection law or that his or her rights under data protection law have otherwise been violated.

## 5 Technical Protection

5.1 The protection of personal data is undertaken through corresponding precautionary organisational and technical measures. These precautionary measures affect particularly the protection against impermissible, illegal or also unintended access, processing, loss, usage and manipulation.

### 5.2 [www.tulkulobsang.org](http://www.tulkulobsang.org):

In case of payment by Paypal or Klarna, the user will be forwarded to the page of "Paypal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg" or "Klarna Bank AB (publ) registered with the Swedish companies register under the registration number 556737-0431 and with the main office located at Sveavägen 46, 111 34 Stockholm, Sweden". In this case, the collection and processing of data is based on the respective data protection declaration from [PayPal](#) or [Klarna](#).

When paying by credit card, the user will be forwarded to the page of „Unzer Austria GmbH, Grüngasse 16, 1050 Vienna, Austria“, formerly mPAY24. In this case, the collection and processing of data is based on the data protection declaration from [Unzer Austria GmbH](#).