

Privacy Policy

Smoke-Free Dialogues Registration Site

Definitions

“SustainAbility” is the controller of your data, hereafter referred to as “we”, “our” or “us”.

“BI WORLDWIDE” is the processor of your data, commissioned by us and hereafter referred to as “BIW” or “BI WORLDWIDE”.

“You” refers to the invited attendee and/or guest.

“Event” refers to the programme that you have been invited to attend.

This Privacy Policy

This is a Privacy Policy for the Event you have been invited to attend and it explains how and why we (and/or BIW on our behalf) collect your Personal Information in relation to the Event, and what we (and/or BIW on our behalf) will do with it. This policy also tells you about your privacy rights and how the law protects you.

Before providing us (and/or BIW on our behalf) with any further details, you should read through this policy to understand our practices regarding your Personal Information.

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1 ABOUT SUSTAINABILITY (AND HOW TO CONTACT US)

SUSTAINABILITY Limited is a company registered in United Kingdom registration no. 2108210. Our registered office is at 24 Greville Street, London, EC1 N 8SS.

We have invited you to attend the Event.

For the purposes of data protection law we will be the controller of your Personal Information. This means we make decisions about how and why your information is used in relation to the Event, and have a duty to ensure your rights are protected.

If you have any questions for us in relation to this Privacy Policy, you can contact us using the following details:

E-mail Address:

privacy@sustainability.com

Postal Address:

Data Protection Officer, SustainAbility

24 Greville Street, London, EC1 N 8SS

2 ABOUT BL WORLDWIDE (AND HOW TO CONTACT BIW)

BI WORLDWIDE Limited is a company registered in England and Wales, registration no. 1445905. BIW's registered office is at 1 Vantage Court, Newport Pagnell, Buckinghamshire, MK 16 9EZ.

We have commissioned BIW to help plan and organise the Event on our behalf.



For the purposes of data protection law BIW is a processor of your Personal Information. This means BIW will process your information on our behalf in relation to the Event as instructed by us and in accordance with a written contract that ensures your rights are protected.

If you have any questions for BIW in relation to this Privacy Policy, you can contact BIW using the following details:

E-mail Address:
data.protection.manager@eu.biworldwide.com

Postal Address:
Data Protection Manager, BI WORLDWIDE
1 Vantage Court, Newport Pagnell, Buckinghamshire, MK16 9EZ

3 INFORMATION WE PROVIDE TO BIW AND INFORMATION WHICH WE AND/OR BIW COLLECT

You are invited to the Event. In order to confirm your attendance at the Event we have provided or will provide BIW with certain Personal Information about you. We (and/or BIW on our behalf) will also need to collect further Personal Information about you.

Your Personal Information

We (and BIW on our behalf) will only collect Personal Information from you that is necessary to enable us (and BIW on our behalf) to plan and organise the Event. This will usually be a combination of information such as:

- Your name
- Contact details such as your home address; email address and telephone number
- Any special needs/health or dietary requirements. Some of this information may be considered sensitive (see further below)
- Next of kin information in the event of an incident or emergency
- Passport details where it is required to confirm your travel and/or accommodation arrangements
- Technical data relating to your use of the Registration Site and/or Event App (see further below)

How We and BIW Collect Your Personal Information

We pass your details to BIW so that you can register for the Event.



BIW uses a specialist Registration Site and/or Event App on our behalf provided by third party suppliers which enable us (and BIW on our behalf) to safely collect, control and organise all of your Personal Information in relation to the Event.

The Registration Site and/or Event App may automatically collect technical data about your equipment, browsing actions and patterns as described further below.

Once you have registered on the Registration Site, BIW may contact you on our behalf to arrange travel and/or other logistics to facilitate your participation in the Event, which may necessitate the collection of additional information as noted above.

How We and BIW Use Your Personal Information

We (and/or BIW on our behalf) will use your Personal Information for the purpose of providing you with Event related services, including, but not limited to: venue selection and booking, meals, flight, travel, security and related activities.

We will only use your Personal Information when the law allows us to.

The reason that we will use your Personal Information in the manner set out in this policy is because we need to in order to pursue our legitimate interests in arranging and managing the Event and your attendance at the Event (providing this isn't overridden by your rights).

In certain cases we may also use your Personal Information in the manner set out in this policy in order to: enter into, or perform, a contract with you; comply with a legal or regulatory obligation; and/or protect your vital interests.

Your information will only be used for the purpose(s) that we (and/or BIW on our behalf) have collected it for (or else for a closely related purpose, such as record keeping).

In some circumstances, the disclosure and processing of your Personal Information will be a mandatory requirement, if you do not provide the information it is likely you will be unable to attend the Event. For example, some countries only permit travel if you have provided the requisite mandatory information for the purpose of local or National Government requirements, immigration, border control, security and anti- terrorism purposes.

Sharing Information

We (and/or BIW on our behalf) will share information with third party suppliers, such as hotels, venues, ground handlers, transport operators, events caterers and logistical staff. This will include your Personal



Information where it is necessary in order for the recipient to carry out their activities and services in relation to the Event (and your attendance at the Event). They will only be allowed to use your Personal Information for a specific purpose and we (and/or BIW on our behalf) will have a written agreement with each recipient of your Personal Information.

We will never sell or trade your Personal Information.

Sensitive Information

Some Personal Information that we (and/or BIW on our behalf) may collect is considered to be "sensitive information" under applicable data protection laws. Sensitive information includes (but is not limited to) details on your health, dietary requirements, racial or ethnic origin, religion, sex, criminal convictions and political opinions. We (and BIW on our behalf) will only use your sensitive information where its use is necessary to protect your vital interests or where you have given explicit consent to its use by having provided the sensitive information to us (and/or BIW on our behalf) and it is absolutely necessary to fulfil your requirements for the Event such as: where you may be required to disclose details as to your health to ensure you are able to participate in certain activities; where you may have specific dietary requirements; where we (and/or BIW on our behalf) need to use the information to protect your safety in an emergency and where, for example, special adaptations will need to be put in place on an airline or at a hotel to accommodate your specific needs and requirements.

Updating Your Information

It is important that the Personal Information we (and BIW on our behalf) hold about you is accurate and current. Please keep us (and BIW on our behalf) informed if your Personal Information changes during the course of this Event by emailing the Event Team, details of which can be found on the registration invitation and Registration Site.

4 KEEPING YOUR INFORMATION SAFE

We (and BIW on our behalf) employ a variety of physical and technical measures to keep your Personal Information safe and to prevent unauthorised access to, or use or disclosure of it. Electronic data and databases are stored on secure computer systems and we (and/or BIW on our behalf) control who has access to them (using both physical and electronic means).

We have ensured that BIW are compliant with ISO'.27001:2013 and hold current accreditation.

Neither we nor BIW can absolutely guarantee the security of the internet or external networks or your own device, accordingly any online communications (e.g. information provided by email or through our Website) are at your own risk.



We (and/or BIW on our behalf) have put in place procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of a breach where we are legally required to do so.

5 REGISTRATION SITE AND COOKIES

When you receive the Event invitation and click on the relevant link, you will be taken to a Registration Site. We (and/or BIW on our behalf) may collect non-personal information about visitors to this Registration Site as this helps to optimise and improve its functionality. This information might include your internet protocol address, the browser being used to connect to our site, the device (e.g. its operating system) and the connection type (e.g. the Internet service provider used). However, none of this information will directly identify you.

Cookies

We (and/or BIW on our behalf) may use “cookies” to enhance your experience and enable certain functionality (such as remembering you in order to make updating your details easier, in the event that there is a change in circumstances). Web browsers place cookies on hard drives for record-keeping purposes and sometimes to track information (such as repeat visits). You can choose to set your Web browser to refuse cookies, or to alert you when cookies are being sent. However, if you refuse to allow cookies, this may interfere with your ability to use the portal. For more information about the cookies used, please see the Cookie policy.

6 COMMUNICATIONS

Where an Event App is provided as part of your Event communications experience, this will be available to you through the App Store. A code will then be sent to you to enable you to have access to the Event App. The Event App enables you to have immediate access to pre-event and onsite updates, as well as post event communications about the Event.

It remains your choice as to whether you download this Event App or not. If you choose not to download the App, we (and/or BIW on our behalf) may contact you by email or telephone to notify you about changes to the Event's schedule, or to confirm your Event details.

Marketing

BIW will not send you marketing materials at any point.

7 PHOTOGRAPHS/VIDEO/IMAGERY



We (and/or BIW on our behalf) may organise via third party suppliers, photographs, videos and/or filming to be undertaken at the Event. Your image and the venue may be identifiable. Images may be published on social media or incorporated into marketing materials.

If you do not give your consent, please contact the Event Team, details of which can be found on the registration invitation and Registration Site. We (and/or BIW on our behalf) will instruct third party suppliers accordingly.

8 RETENTION AND STORAGE

We (and BIW on our behalf) will only retain your Personal Information for as long as it is required for the purpose(s) that we (and/or BIW on our behalf) collect it for (or for a related compatible purpose, such as keeping a record of a transaction).

To determine the appropriate retention period for your Personal Information, we consider the amount, nature, and sensitivity of your Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we (and/or BIW on our behalf) process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

After this period, it will be deleted. We regularly review what data we have and delete that which is no longer necessary. In certain situations you have the right to request that your data be deleted (the right to be forgotten). Please see Section 11 for further details.

If you believe that any information we (and/or BIW on our behalf) are holding about you is incorrect or incomplete, please contact us (and/or BIW on our behalf) using the details set out at the beginning of this Policy.

Unless provided otherwise below, BIW will only store your Personal Information within the European Economic Area (EEA).

9 INTERNATIONAL TRANSFERS

If the Event is being held within the EEA, unless provided otherwise below, neither we (nor BIW on our behalf) will transfer your Personal Information outside the EEA.

If an event is being held outside of the EEA we (and/or BIW on our behalf) will need to transfer your Personal Information outside of the EEA.



Whenever we (and/or BIW on our behalf) transfer your Personal Information out of the EEA, we will seek to ensure a similar degree of protection is afforded to it by seeking to implement at least one of the following safeguards:

- We (and/or BIW on our behalf) will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- Where we (and/or BIW on our behalf) use certain service providers or suppliers, we (and/or BIW on our behalf) may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en
- Where we (and/or BIW on our behalf) use providers or suppliers based in the US, we (and/or BIW on our behalf) may transfer your Personal Information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

In the event that we are unable to implement at least one of the above safeguards we (and/or BIW on our behalf) will only transfer your Personal Information out of the EEA if we are able to rely on at least one of the following:

- you have explicitly consented to the transfer, after having been informed of the possible risks of such transfer due to the absence of any of the above safeguards;
- the transfer is necessary for the performance of a contract between you and us or the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party (including, but not limited to, BIW).

Please contact us (and/or BIW on our behalf) using the details given at the beginning of this Policy if you want further information on the specific mechanism used by us (and/or BIW on our behalf) when transferring your Personal Information out of the EEA.



10 USAGE DATA

The navigation on the Registration Site and/or Event App (as well as the use of any third party's application embedded and/or available in the Registration Site and/or Event App), implies the communication of Usage Data, which is implicitly acquired during your navigation through the internet communications protocol.

Usage Data includes, but is not limited: to the IP addresses or domain names of the devices you utilise; the URI address; the time of the request; the numerical code indicating the status of the server's answer (successful outcome, error, etc.); the country of origin; the features of the browser and the operating system you utilise; the various time details per visit; the details about the path followed within the Registration Site and/or Event App with special reference to the sequence of pages visited and other parameters about the device's operating system and/or your IT environment.

Usage Data is not collected for the purposes of identifying you. However, you must be aware that the identification may be possible through further elaborations and associations.

11 YOUR RIGHTS

We want you to remain in control of your Personal Information. Part of this is making sure you understand your legal rights, which are as follows:

- (a) where your Personal Information is processed on the basis of consent, the right to withdraw that consent
- (b) the right to confirmation as to whether or not we (and/or BIW on our behalf) have your Personal Information and, if we (and/or BIW on our behalf) do, to obtain a copy of it
- (c) the right to have inaccurate information about you rectified
- (d) the right to object to your information being used for marketing or profiling, or on the basis of our or a third party's legitimate interests
- (e) the right to restrict how your Personal Information is used
- (f) the right to be forgotten, which allows you to have Personal Information about you erased in certain circumstances (though this is not an absolute right and may not apply if we need to continue using it for a lawful reason).

If you would like further information on your rights or wish to exercise any of them, please contact us (and/or BIW on our behalf) using the details given at the beginning of this Policy.



Please keep in mind that there are exceptions to the rights above and, though we (and/or BIW on our behalf) will always try to respond to your satisfaction, there may be situations where we (and/or BIW on our behalf) are unable to do so (for example, because the information no longer exists or there is an exception which applies to your request).

If you are not happy with our response (and/or BIW's response on our behalf), or you believe that your data protection or privacy rights have been infringed, you should contact the Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at www.ico.org.uk.

12 UPDATES TO THIS POLICY

We may update this Policy at any time. When we do, we will revise the date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we (and/or BIW on our behalf) are helping to protect the Personal Information that we (and/or BIW on our behalf) collect. Where appropriate we (or BIW on our behalf) will notify you of the change by email.

This policy was last updated on 12/04/2019.

