

July 2019

International Currency Association (ICA) - Privacy Policy

Objective

The aim of this privacy policy is to provide adequate and consistent safeguards for the handling of Personal Data (as defined below) by ICA in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("General Data Protection Regulation", or 'GDPR').

Scope

ICA is the controller and responsible for its websites. This privacy policy is issued on behalf of and applies to all ICA entities in the EU that process personal data. The GDPR will apply to ICA entities that are either 1) established in the EU or 2) offer services in the EU to data subjects in the EU or 3) which monitor the behavior of such data subjects.

"Personal data" means any information relating to a "data subject", i.e. an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, an online identifier or to one or more factors specific to the person's physical, physiological, genetic, mental, economic, cultural or social identity and includes information, that (i) relates to an identified or identifiable person (ii) can be linked to that person; (iii) is transferred to ICA entities and (iv) is recorded in any form. It does not include data where the identity has been removed (anonymous data).

ICA has appointed a contact person who is responsible for overseeing questions in relation to this privacy notice. If data subjects have any questions about this privacy notice, including any requests to exercise their legal rights, they should contact ICA's contact person using the details set out below:

Director General

International Currency Association

secretariat@currencyassociation.org

10 Windmill Business Village, Brooklands Close,

Sunbury-on-Thames, TW16 7DY, UK

Data subjects are invited to contact the ICA point person in case of questions. They also have the right to make a complaint at any time to the UK Information Commissioner's Office (ICO), the supervisory authority for data protection issues (<https://ico.org.uk/>).

Principles of processing personal data

ICA respect data subjects' privacy and are committed to protecting personal data in compliance with the applicable legislation in the EU with the desire to keep its data subjects informed and to recognize and respect their privacy rights. ICA will observe the following principles when processing personal data:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified, legitimate purposes and will not be processed further in ways incompatible with those purposes.
- Data will be relevant to and not excessive for the purposes for which they are collected and used.
- Data subjects in the EU will be asked to provide their clear and unequivocal consent for the collection, processing and transfer of their personal data.

- Data will be accurate and, where necessary kept up up-to-date. Reasonable steps will be taken to rectify or delete personal data that is inaccurate or incomplete.
- Data will be kept only as it is necessary for the purposes for which it was collected and processed. Those purposes shall be described in this privacy policy.
- Data will be deleted or amended following a relevant request by the concerned data subject, should such notice comply with the applicable legislation each time.
- Data will be processed in accordance with the individual's legal rights (as described in this policy or as provided by law).

It is important that the personal data which ICA hold about data subjects is accurate and current. Data subjects should keep ICA informed if their personal data changes during their relationship with ICA.

Appropriate technical, physical and organizational measures will be taken to prevent unauthorized access, unlawful processing, unlawful alteration or disclosure and unauthorized or accidental loss, destruction or damage to data. In addition, ICA limit access to the personal data of data subjects to those employees, agents, contractors and other third parties who have a business need to know. ICA will ensure personal data is processed on their instructions and subject to a duty of confidentiality. In case of any such violation with respect to personal data, ICA will take appropriate steps to end the violation and will notify relevant data subjects and any applicable authority or regulator in accordance with applicable law and will cooperate with all such competent authorities.

Types of personal data

ICA collect data subjects' personally identifiable information:

- Contact, usage and profile information, such as name, user name or similar identifier, password, postal address, title, email address and telephone number, interests, preferences, feedback and survey responses.
- Personal data in content subjects provide on ICA websites and other data collected automatically through the websites (such as IP addresses, login data, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on these websites (including products or services used), and dates and times of website visits).
- Financial account and transaction information, including billing address, details about payments to and from data subjects and other details of products and services received from ICA.
- Marketing and communications data include data subject preferences in receiving marketing from ICA entities and their third parties and data subject communication preferences.

ICA and entities do not collect any sensitive personal data (as defined in the GDPR) about its data subjects (this includes details about race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information regarding health and genetic and biometric data). Nor do ICA and entities collect any information about criminal convictions and offences.

Ways of obtaining personal data

The ways by which ICA entities obtain personal data are set out in this section. ICA entities do not obtain any personal information about data subjects unless the data subject has provided that information to ICA entities in a way that is in accordance to the established data protection rules to do so including but not limited to visiting or creating an account with respect to ICA entities' websites, applying for or subscribing to ICA entities' services or publications, requesting that marketing be supplied by ICA entities, providing feedback, entering any promotion or survey, by the completion of a written agreement, consent form, survey, or completion of an on-line or hard copy form. Data subjects may choose to submit personal, private information by facsimile, regular mail, e-mail, or electronic transmission over ICA entities' internal websites, interoffice mail, or personal delivery, as each of these methods may be deemed applicable each time.

Automated technologies or interactions

When interacting with ICA entities' websites, ICA entities may automatically collect technical data about the equipment, browsing actions and patterns of its data subjects. ICA entities collect this personal data by using cookies, server logs and other similar technologies. ICA entities may also receive technical data about a data subject if it visits other websites employing their cookies. Please see ICA entities' cookie policy below for further details.

Third parties or publicly available sources

ICA entities may receive personal data about data subjects from various third parties and public sources as set out below:

- Technical data from the following parties: analytics providers such as Google based outside the EU; and search information providers Facebook, Twitter, Google, LinkedIn based inside and outside the EU;
- Contact, financial and transaction data from providers of technical, payment and delivery services based inside the EU;
- Identity and contact data from data brokers or aggregators such as Google based outside the EU.

Use of personal data

ICA entities collect and use data subjects' personal information to operate the ICA entities' websites and deliver requested services. ICA entities also use personally identifiable information to inform on services available from ICA entities. ICA entities may also contact data subjects via surveys to conduct research about their opinion of current services or of potential new services that may be offered.

For data subject's specific information, the purposes of processing may include:

- Management of ICA entities' relationships with its data subjects
- Processing payments, expenses and reimbursements
- Carrying out ICA entities' obligations under various contracts

IP addresses, browser types, domain names, access times and referring website addresses are used by ICA entities for the operation of the service, to maintain quality of the service and to provide general statistics regarding use of the ICA entities' websites.

ICA entities keep track of the websites and pages their data subjects visit, in order to determine what services are the most popular. This data may be used to deliver customized content to data subjects whose behaviour indicates that they are interested in a particular subject area.

If ICA entities introduce a new process or application that will result in the processing of personal data for purposes that go beyond the purposes described above, ICA entities will inform the concerned data subjects of such new process or application, new purpose for which the personal data are to be used, and the categories of recipients of the personal data.

ICA entities will disclose data subjects' personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the law or comply with legal process served on ICA entities or the sites; (b) protect and defend the rights or property of ICA entities; and, (c) act under exigent circumstances to protect the personal safety of data subjects of ICA entities, or the public.

Use of Cookies

The ICA entities' websites use "cookies" that automatically track certain information about visitor activity on the sites. Cookies are data files that contain information created by a web server that can be stored on a visitor's hard disk for use either during a particular session or for future use. ICA entities use cookies only to support visitor's interaction with the site and keep it running efficiently. This information includes the browser and operating system being used, the IP address and the referring URL.

ICA entities will not use cookies to collect personally identifiable information. However, if a visitor wishes to restrict or block the cookies which are set by their websites (or indeed any other website), this can be done through the browser settings.

Equipment and Information Security

To safeguard against unauthorized access to personal data by third parties outside ICA entities, all electronic personal data held by ICA entities are maintained on systems that are protected by up-to-date secure network architectures that contain firewalls and intrusion detection devices. The data saved in servers is "backed up" (i.e. the data are recorded on separate media) to avoid the consequences of any inadvertent erasure, destruction or loss otherwise. The servers are stored in facilities with high security, access protected to unauthorized personnel, fire detection and response systems.

Access security

The importance of security for all personally identifiable information is of highest concern. ICA entities are committed to safeguarding the integrity of personal information and preventing unauthorized access to information maintained in ICA entities' databases. These measures are designed and intended to prevent corruption of data, to block unknown and unauthorized access to our computerized system and information, and to provide reasonable protection of personal data in ICA entities' possession. Access to the computerized database is controlled by a log-in sequence and requires users to identify themselves and provide a password before access is granted. ICA entities may need to request specific information from data subjects in order to help them confirm the identity of that data subject and to ensure the right of that data subject to access its personal data (or to exercise any of its other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Rights of data subjects

Data subjects have certain rights under data protection legislation concerning the personal data ICA entities hold, including the following:

- Request access (commonly known as a "data subject access request")

This enables the data subject to receive a copy of the personal data ICA entities hold and to check it is lawfully processed.

- Request correction:

This enables the data subject to have any incomplete or inaccurate data corrected. ICA entities may need to verify the accuracy of the new data that is provided.

- Request erasure:

This enables the data subject to ask ICA entities to delete or remove personal data where there is no good reason for continuing to process it.

The data subject also has the right to ask ICA entities to delete or remove personal data where the right to object to processing has been successfully exercised, where information has been processed unlawfully or where personal data was erased to comply with local law.

However, ICA entities may not always be able to comply with a request of erasure for specific legal reasons. These reasons will be notified to the data subject at the time of the request.

- Object to processing:

This enables the data subject, where ICA entities are processing the data subjects' personal data relying on a legitimate interest (or that of a third party), to object to processing because of the particular situation that impacts on the data subject's fundamental rights and freedoms.

In some cases, ICA entities may demonstrate the existence of compelling legitimate grounds to process information which override the data subject's rights and freedoms.

- Request restriction of processing:

This enables the data subject to ask ICA entities to suspend the processing of personal data in the following scenarios: (a) where the accuracy of the data needs to be established; (b) where the use of the data is unlawful, but the data subject does not want it to be erased; (c) where the data subject wishes ICA entities to hold the data in order to be able to establish, exercise or defend legal claims even though ICA entities do not need it; or (d) the data subject has objected to ICA entities' use of the data, but it has to be verified whether there are overriding legitimate grounds to continue to process it.

- Request the transfer:

This enables the data subject to ask ICA entities to provide to the data subject, or a third party the data subject has chosen, personal data in a structured, commonly used, machine-readable format.

- Withdraw consent at any time:

Withdrawal of consent will not affect the lawfulness of any processing carried out before consent is withdrawn. If consent is withdrawn, ICA entities may not be able to provide certain services. In this case, the data subject will be advised at the time that consent is withdrawn.

A data subject who wishes to exercise any of the rights set out above should contact ICA's contact person {Director General} at secretariat@currencyassociation.org

If a data subject fails to provide personal data

Where ICA entities need to collect personal data by law, or under the terms of a contract it has with a data subject and that data subject fails to provide that data when requested, ICA entities may not be able to perform the contract they have or are trying to enter into with that data subject (for example, to provide services). In this case, ICA entities may have to cancel a product or service that the data subject has with it. ICA entities will notify the relevant data subject if this is the case at the time.

Third party links

ICA entities' websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about the data subject.

ICA entities do not control these third-party websites and cannot be held responsible for their privacy policy. Therefore, ICA entities recommend that when data subjects leave their websites that they should read the privacy policy of every website visited.

Data retention period

Data subject preferences and personal data processed for the use of any of ICA entities' services will be retained for so long as is necessary to fulfil the purposes for which it was collected (including for the purpose of satisfying any legal, accounting or reporting requirements). To determine the appropriate retention period for personal data, ICA entities consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of the personal data, the purposes for which they process the personal data of data subjects and whether they can achieve those purposes through other means, and the applicable legal requirements. Personal data may be held for up to 5 years, after which ICA entities will be active in securely deleting the information.

Transfer outside the EU

In connection with the activities of ICA entities, ICA entities may transmit personal data outside the EU and more specifically to ICA's additional affiliated entities worldwide. ICA entities ensure that the personal data of data subjects is protected, by requiring all its affiliated entities outside the EU to follow the same rules when processing the transferred personal data.

Whenever ICA entities transfer the personal data of any data subject outside the EU, ICA entities ensure a similar degree of protection is afforded to it by this privacy policy.

ICA entities may be contacted if further information is wished on the specific mechanism they use when transferring personal data out of the EU.