

# AGN International Privacy Policy Updated 3.18

This privacy policy explains data practices of AGN International Ltd (and its regional affiliates, together referred to below as “AGN”) regarding personal data (as defined below) and other information that we collect in connection with:

- (i) Your use of the membership services offered by AGN.
- (ii) Your use of the website AGN.ORG, and/or other AGN websites that we might have from time to time
- (iii) Other online communities administered by AGN, including sharegroups
- (iv) Apps used by AGN
- (v) Any AGN events or event you attend
- (vi) Webinars and other virtual events hosted by AGN

Our use of information on behalf of individuals who work at businesses that have joined as members AGN is governed by our contract with that member, and by the member’s own privacy policies. We are not responsible for the privacy policies or privacy practices of members or of other third parties.

By joining AGN and using our website and/or our Apps, and by attending our events, you consent to policies and practices described in this privacy policy. If you do not agree with the data practices described in this privacy policy, you should discontinue AGN membership.

## Our Collection of Your Personal Data

AGN collects and uses information that, alone or in combination with other information, could be used to identify you (“**personal data**”) in order to deliver our membership services, including administering events and online communities, and to inform you of various information, opportunities and provide support to you. Such data is usually provided to us by our members.

### ***Personal Data That is Provided to Us by Your Firm.***

The types of personal data that we collect vary based on the services offered on the websites and apps, but generally include your name, address, telephone number, company name, job title, email address, areas of expertise, photos and other information that is submitted to us by the member you work for.

When you participate in sharegroups and other online communities, we may collect the information that you elect to upload to your profile. We do not control the content that users post to sharegroups or other online communities.

***Information Received from Other Sources.*** We may receive information about you from publicly available sources and third-party databases, or from third parties that provide information about business people and companies, including third parties from whom we may have purchased information (including an individual’s name, job title, business contact information, and information about the business where the individual

works). We may combine this data with information we already have about you. This helps us to update, expand and analyze our records.

***Automatically Collected Data.*** As you interact on our website, we may collect information about your computer or device and visits to our website (“**Automatically Collected Data**”) through cookies, web beacons and other technologies, Internet Protocol (IP) address tracking/URL tracking, and other tools (collectively, “**Tracking Technologies**”). These types of collected on our websites through the use of these and other tools that we may add from time to time may include: the search terms you used, new or returning user information, browser information, computer or device type, operating system, internet service provider, website usage, referring/exit pages, platform type, date/time stamp and clicks.

## How We Use Information

***Provide services and respond to requests.*** We use the personal data we collect from you (unless otherwise restricted by law) to:

- Provide the membership services our member has ordered from us. For EU Data Subjects, such use is necessary for the performance of the contract between you and us.
- Respond directly to your information requests. For EU Data Subjects, such use is necessary to respond to or implement your request prior to entering into a contract with us.
- Facilitate your engagement in AGN events and sharegroups. For EU Data Subjects, such use is necessary for the performance of the contract between you and us.

***Event and Services Promotion.*** We send you push notifications from time-to-time in order to update you about AGN events and other services. If you no longer wish to receive these types of communications, you may turn off promotional emails on your profile. To ensure you receive proper notifications, we will need to collect and retain certain information about you.

Where required by the applicable law (for example, if you are an EU Data Subject – see below), we will send you marketing information or notifications only with your consent, which was given at the time your firm joined AGN.

***Correspondence.*** If you correspond with AGN via email, a postal service, our web forms or other form of communication, we may retain the correspondence and the information it contains. We may use the information for business purposes, including responding to your inquiry, notifying you of AGN-related opportunities and other purposes.

***Aggregated Data.*** We may also compile, anonymize and/or aggregate membership data and other information collected about websites’ visitors, as described in this privacy policy, and use such anonymized and/or aggregated data for business

purposes. This aggregate information does not identify you. For EU Data Subjects, this use of your personal data is necessary for our legitimate interests in understanding how our membership services are being used by you.

**Service Data.** Our use of information collected on behalf of our members is limited to the purpose of providing the service for which our member has engaged us and is governed by our contract with members and their own privacy policies.

## **Disclosure and Cross Border Transfer of Information**

AGN discloses personal data that we collect (described above) in accordance with the terms set forth in this section.

We share your personal data with third parties who provide certain services to us to assist us in meeting business operation needs. These parties are authorized to process your personal data, on our behalf and pursuant to our instructions, only as necessary to provide these services to us. We share your personal data with the following service providers:

- Providers of payment processing and accounting, as necessary to process payment from our members
- Learning management systems that we use for sharegroups
- Providers of research and analytics services, including Google Analytics
- Providers of cloud computing infrastructure services
- Other vendors that provide services to us and need personal data to provide properly those services

We may also disclose personal data to third parties in the following circumstances: (1) if you request or authorize (when required by the law, we will inform you in advance of the third parties to which we may provide your data and the purpose for doing so, and we will obtain your prior consent for such use); (2) the information is provided (a) to comply with the law (for example, to comply with a search warrant, subpoena or other legal process), (b) to enforce an agreement we have with you, (c) to protect our rights, property or safety, or the rights, property or safety of our employees or others, (d) to investigate fraud, or (e) to respond to a government request or to lawful requests by public authorities, including to meet national security or law enforcement requirements; (3) to address emergencies or acts of God; (4) to address disputes, claims, or to persons holding a legal or beneficial interest; (5) if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, in which case your personal data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

We collect, store and process the information from our websites and apps primarily in the United States of America (U.S.). Third parties described above might store the information in other territories. If you are outside the U.S., then your personal data and other information will be transferred to the U.S, or elsewhere. The data privacy and data protection laws outside your country may offer less protection than the laws in your

country. By using our services, the websites and/or apps or otherwise providing us with your personal data, you agree to the transfer of your personal data as described in this privacy policy. If you do not agree to such cross-border transfers of your personal data, please do not submit it through the websites and/or apps.

## How You Can Access and Change Information

AGN acknowledges that you have the right to access your personal data. Our website allows you to access, correct, amend or delete inaccurate data. In the event that you request us to remove data, we will respond within a reasonable timeframe. You may make any such requests by contacting us as indicated under “Contact Us” section of agn.org.

## Specific Information for EU Data Subjects

**Scope.** This section applies if you are an individual located in the European Union (“EU”) (“**EU Data Subject**”). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland.

**Data Processor.** AGN is the data processor for the processing of your personal data, as your firm submits your data to us.

**Your Rights.** Subject to applicable law, you have the following rights in relation to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to have it rectified or completed.
- **Right to erasure:** You may ask us to delete or remove your personal data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your personal data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your personal data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under “Contact Us” section of agn.org.

## **Our Security Measures to Protect Your Personal data**

We are committed to taking reasonable efforts to secure the information that you choose to provide us, and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure or destruction of personal data. We restrict access to personal data to our employees, contractors and service providers who need to know the information in order to operate, develop or improve our services.

Unfortunately, no transmission of personal data over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, we cannot guarantee or warrant the security of any information you transmit to us. AGN has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this privacy policy or the security of your personal data, please contact us.

We retain your personal data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements. We retain personal data collected from the firm which we process on behalf of our members for as long as needed to provide services to our members and pursuant to our contract with that member firm.

Any breach of confidential data would be taken seriously and member firms would be notified as soon as possible.

## **Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties**

This privacy policy only addresses AGN’s use and disclosure of your personal data. The websites and apps may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, and we are not liable for their misuse of personal data. We encourage you to be aware that when you go to another website you should carefully assess their privacy policy to ensure it meets your needs.

## **Children**

The websites and apps are not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13.

## **Conditions of Use**

By joining our organization, you agree to the terms and conditions contained in this privacy policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use the websites, apps and/or any AGN benefits or services.

## **Changes to the Privacy Policy**

As AGN, its products and its services change from time to time, we may update this privacy policy to reflect changes to our information practices. We reserve the right to amend the privacy policy at any time, for any reason, and may do so by posting a new version online. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact Us**

If you have any questions about this privacy policy or our treatment of the information you provide us, please contact us as indicated under “Contact Us” section of [agn.org](http://agn.org).