

# **GDPR Privacy Policy**

Doc. PC-002-01 September 2018

The Women's International Shipping & Trading Association Limited ("WISTA International," "we," "us," or "our") is committed to protecting and respecting your privacy. We want you to be familiar with how we collect, use, and disclose information relating to you, your computer, or your device from which you can be identified ("Personal Data").

This Privacy Policy applies to:

- Personal Data collected on <u>www.wistainternational.com</u> or subdomains thereof, and any other WISTA International website or application that links to this Privacy Policy (collective, the "Sites");
- Any social media accounts administered by us, including those located on Facebook, LinkedIn, Instagram, and Twitter; and
- Personal Data that we process about individual members of WISTA International's National WISTA
  Associations ("NWAs"), whether or not such information is collected online or offline.

(collectively, the above three bullets are the "Services").

WISTA International may change this Privacy Policy from time to time, and it is your responsibility to check the WISTA International website periodically, so you are aware of any changes. When we make changes to this Privacy Policy, we will notify you by posting the updated Privacy Policy on the WISTA International website with an updated effective date at the top of the Privacy Policy. We may also notify you of material changes by email if your email address is registered to receive WISTA updates. By using any of the Sites, you are agreeing to be bound by this Privacy Policy.

Any questions regarding this Privacy Policy and WISTA International's privacy practices should be sent by email to <u>wista@wistainternational.com</u> or by writing to WISTA International's registered office: Claremont, Holland Road, Maidstone, Kent, England, ME14 1UT ("Registered Office").

# WHAT IS WISTA INTERNATIONAL?

Formed in 1974, WISTA International is a global organisation connecting female executives and decision makers around the world. The National WISTA Associations ("NWAs"), which are members of WISTA International, provide in-country and regional networking, business and skill building opportunities, and corporate visibility, and also facilitate relationships within the industry.



On a global scale, individual members of WISTA International's NWAs have access to a diverse network of executives in the shipping, trading, and logistics industries on whom they can call for referrals, connections, advice, or business collaborations.

WISTA International is classed under the GDPR regulations as a data controller. That means WISTA International decides how your Personal Data is processed and for what purposes. WISTA International is a company registered in England and Wales, Company number 05396872, with the registered address noted above. For all data protection matters please email <a href="wista@wistainternational.com">wista@wistainternational.com</a> or write to our Registered Office.

# COLLECTION OF PERSONAL DATA.

We may collect the following Personal Data about you:

# 1. Information you provide

- We collect Personal Data that you knowingly choose to provide through the Sites or when you
  interact with WISTA International in order to benefit from a particular feature or participate in a
  particular activity, such as when you sign up to receive emails from us or complete a form on one of
  the Sites.
- We may receive Personal Data about you, such as your name, company, job title, and business
  contact information, from the responsible NWA if you choose to serve in a particular role with the
  NWA or with WISTA International, such as if you choose to serve on the WISTA International
  Executive Committee ("ExCo") or as an Ambassador, or if you participate in a WISTA International
  committee, or present at a WISTA International conference or event.
- We receive any information that you choose to provide if you post information on one of our social media pages.
- If you apply for a scholarship opportunity, we will receive Personal Data about you from the responsible NWA, such as your name, contact information, and CV.
- If you choose to include your profile on the WISTA website or on a WISTA App, we will receive the Personal Data included in your profile.
- We may collect any Personal Data that you knowingly provide if you choose to complete a survey.
- If you contact us, we may keep a record of that correspondence.
- We may collect other Personal Data as explained at the time of collection.

# 2. Passive Information Collection, Use, and Choices

As you navigate the Sites, certain Personal Data may be passively collected, meaning it is gathered without you actively providing it. This is done using the following techniques in the following ways:

• IP Addresses and Device Data: An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our Sites, we may view the IP address and other device data of the device you use to connect to the Internet. We use



this information to determine the general physical location of the device and understand from what geographic regions our website visitors come. We also may use this information to calculate Site usage levels, help diagnose server problems, and administer the Sites.

- Through your browser. Certain information is collected by most browsers, such as your Media Access Control ("MAC") address, computer type and operating system type and version screen resolution, and Internet browser type and version.
- Social Media Widgets. Our Sites may include social media tools, including social media widgets or plug-ins, to connect you to our social media accounts. These features may set a cookie or use other automatic collection and tracking technologies to collect information about you and your use of the social media features through and in connection with our Sites. These social media tools may be hosted by a third party. Your interactions with these tools and the corresponding social media platforms are governed by the privacy policies of the companies that provide such platforms.
- Cookies: Like many organizations, our Sites may use "cookies" to help make sure the Sites are meeting the needs of our users and to help us make improvements. Cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. We may use cookies set by us on the Sites to tell us, for example, whether you have visited us before or if you are a new visitor. We use third-party cookies set by our service provider, Google Analytics, to collect information about how visitors use the Sites, including how long you spend on each page, and how you got to the Sites. We do not use data collected by cookies to identify who you are. We do not allow Google to use or share our analytics data. You can visit <a href="https://www.google.com/analytics/learn/privacy.html">https://www.google.com/analytics/learn/privacy.html</a> to learn more about Google Analytics' use of cookies. Specifically, Google Analytics uses the following cookies if you use the Sites:

Cookie	Cookie Name	Purpose	Expiration
Google	_ga	Measure how	2 years
		visitors use our Site,	
	_gat	including identifying	24 hours
		each unique user to	
	_gid	our Sites and details	1 minute
		of each page visited.	
		_gat is used to limit	
		the collection of	
		analytics data on	
		high traffic sites.	

You can visit <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> for information on how to opt out of Google Analytics cookies.

You can refuse use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies, you may not be able to access all or parts of our Sites or functionality may be limited.



You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies.

Changing your internet browser settings can prevent the use of cookies. Each browser has a different procedure for disabling the use of cookies. The Help function within your browser should tell you how. Alternatively, you may visit <a href="http://www.aboutcookies.org">http://www.aboutcookies.org</a> where you can review information on how to control cookies on a variety of browsers. You will also find details of how to delete cookies from your computer and other general information about cookies.

We do not track your behaviour across third party websites. Our Sites currently do not respond to "Do Not Track" ("DNT") signals and we operate as described in this Privacy Policy whether or not a DNT signal is received, as there is no consistent industry standard for compliance.

### 3. Information About Minors

The Site is not intended for persons under the age of 18. We do not knowingly collect Personal Data from persons in this age group. We reserve the right to delete any information identified as having been provided by such persons at our discretion.

# **HOW IS YOUR PERSONAL DATA USED?**

WISTA International may use your information to:

- Process initial membership applications to WISTA International to join or set up an NWA.
- Process applications to join WISTA International committees.
- Process applications to receive scholarships or other benefits that may be offered from time to time.
- Respond to your enquiries and fulfil your requests.
- Carry out WISTA International's obligations arising from any contracts entered into.
- Seek your views or comments on the services and activities provided by WISTA International.
- Notify you of changes to WISTA International's services, changes to our terms of use for the Sites, and changes to this Privacy Policy.
- To manage profiles held on our website or a WISTA App.
- If in accordance with your preferences, we may post your name, title, company, and contact
  information on the Sites as part of the profiles held on our website or WISTA App, or to identify your
  role with an NWA or WISTA International, such as if you serve as an officer or on a committee.
- If in accordance with your preferences, post copies of the WISTA International newsletter to your email address.
- If in accordance with your preferences, send you communications that may be of interest, including
  information about events that members of WISTA International's NWAs may attend, and other
  activities
- Create aggregated reports about membership where personal data is not revealed but used to compile the aggregated data.
- If in accordance with your preferences, advise you of activities and promotions of other maritime associations that are relevant to WISTA International.



- For our business purposes, such as data analysis, audits, developing new offerings, enhancing our Sites, improving our services, identifying Site usage trends, and determining the effectiveness of our promotional campaigns.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- For any other purpose specified at the point of collection.

# DISCLOSURE OF PERSONAL DATA.

Your Personal Data may be disclosed for the following purposes:

- To our agents, representatives, contractors, and service providers so they can provide us with support services.
- To the relevant NWAs and to other individual members for purposes of managing your participation as an ExCo member, Board member, committee member, or officer or contractor of WISTA International.
- If you are an individual member and it is in accordance with your preferences, your name, title, and contact information will be included in the profiles held on our website or a WISTA App, which is available on-line, and so it may be viewed by individual members and the public.
- If you apply for a scholarship that is jointly sponsored with a third party, we may share your Personal Data with that third-party sponsor for purposes of evaluating the application or processing your registration, if your application is successful. We will notify you at the time of the application that the scholarship is jointly sponsored with a third party.
- You may disclose Personal Data if you post such information on our social media accounts. Please
  note that any information you post or disclose on our social media accounts will become public
  information and may be available to users of the social media accounts and to the general public.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- Otherwise, with your consent.

### WHERE YOUR PERSONAL DATA IS PROCESSED.

No matter where you are located, you consent to the processing and transfer of your Personal Data in and



to other countries, including the United States. The laws of other countries, including the United States, governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

### DATA RETENTION.

WISTA International will review its retention periods for Personal Data on a regular basis. WISTA International will hold your Personal Data in its systems for as long as is necessary for the relevant activity, e.g., as long as you are a member of an NWA, committee, or NWA Board. WISTA International will remove your Personal Data from its systems when you inform WISTA International that you are no longer a WISTA member or as otherwise requested by you.

# WHAT IS WISTA INTERNATIONAL'S LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

The European Union General Data Protection Regulation ("GDPR") requires us to tell you about the lawful grounds we rely on to collect, use, disclose, and otherwise process your Personal Data. Our lawful bases for processing your Personal Data are:

- 1) To enter into and perform a contract with you: We may process Personal Data to meet our contractual obligations to our members, including providing the benefits of membership to individual members, or to take steps in anticipation of entering into a contract.
- 2) <u>To comply with a legal obligation</u>: We need to use and disclose Personal Data in certain ways to comply with our legal obligations, such as our obligation to employ reasonable safeguards to provide you with a safe user experience on our Sites.
- 3) For our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms: In many cases, we handle Personal Data because it furthers the legitimate interests of the organization. This includes:
  - Customer service;
  - Sending communications to you to let you know about information you have told us is important to you;
  - Protecting users, our workers, and our property;
  - Analysing and improving our operations (e.g., optimizing the design and operation of our Sites);
  - Preparing profiles for the website or a WISTA App; and
  - Managing legal issues.
- 4) With your consent: Where permitted by law, we handle Personal Data on the basis of your express consent.



#### YOUR CHOICES.

You have a choice about whether or not you wish to receive information from WISTA International. If you do not want to receive direct communications, then you can make your choices by ticking the relevant boxes on the form on which WISTA International asks about collecting your information. WISTA International will not contact you unless you have given your prior consent. You can change your marketing preferences at any time by contacting WISTA International by email at <a href="wista@wistainternational.com">wista@wistainternational.com</a> or writing to WISTA International's Registered Office.

You can opt-out of the use of certain cookie-related processing by following the instructions above in the section of this Privacy Policy called Passive Information Collection, Use, and Choices.

# HOW YOU CAN ACCESS AND UPDATE YOUR PERSONAL DATA.

The accuracy of your Personal Data is important. WISTA International is working on ways to make it easier for you to review and correct the information that it holds about you. In the meantime, if you change email address, or if any of the other information is inaccurate or out of date, please email WISTA International at: <a href="wista@wistainternational.com">wista@wistainternational.com</a> or write to our Registered Office as indicated above.

You have certain rights with respect to your Personal Data, including the right to access the Personal Data that we maintain, and the right to object to certain processing of Personal Data by WISTA International. If you would like to submit a data access, correction, restriction, or deletion request, or if you would like to object to certain processing, you can do so by contacting us by email at <a href="wista@wistainternational.com">wista@wistainternational.com</a> or writing to our Registered Office, and we will process such request with respect to any Personal Data that we are able to link to you individually based on the information that you can provide to us. These rights and options that you have with respect to Personal Data are subject to limitations and exceptions under applicable law.

# SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION.

When you give WISTA International Personal Data, WISTA International takes steps to ensure that it is treated securely. Non-sensitive details (e.g., your email address) may be transmitted over the Internet and this can never be guaranteed to be 100% secure. As a result, while WISTA International strives to protect your Personal Data, it cannot guarantee the security of any information and you transmit such information at your own risk. Once WISTA International receives your information, WISTA International makes best effort to ensure its security. Where WISTA International has given, or where you have chosen, a password which enables you to access certain parts of the WISTA International website, you are responsible for keeping this password confidential. WISTA International asks you not to share your password with anyone.



#### LINKS TO OTHER WEBSITES

The WISTA International Sites may contain links to other websites run by other organisations. This Privacy Policy applies only to the WISTA International Sites, so WISTA International encourages you to read the privacy statements on the other websites you visit. WISTA International cannot be responsible for the privacy policies and practices of other sites even if you access them using links from the WISTA International Sites. In addition, if you linked to the WISTA International Sites from a third-party site, WISTA International cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

# HOW TO MAKE A COMPLAINT.

Should you have queries or complaints regarding the processing of your Personal Data or this Privacy Policy, please in the first instance contact the WISTA International President and WISTA Data Compliance Officer via email at: <a href="wista@wistainternational.com">wista@wistainternational.com</a> or write to our Registered Office as indicated above. We will try to resolve your concerns. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the UK's Information Commissioner's Office:

- 1. On the Helpline if in the UK, please use 03031231113, or, if outside the UK, please use +44 1625 545 700;
- 2. Via email on the website <a href="https://ico.org.uk/global/contact-us/email">https://ico.org.uk/global/contact-us/email</a> or directly at <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>; or
- 3. At the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

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