

**EACCGC Privacy Policy - Effective March 20, 2020.**  
**Updated February 4, 2021**

The European American Chamber of Commerce, Greater Cincinnati (“EACCGC,” “we,” “us” or “our”) is a not-for-profit with the purpose of assisting European businesses launch and grow their U.S. operations through our trusted and engaged business networks. We provide programming and networking events in Greater Cincinnati to foster the development of European businesses.

We are committed to securing your privacy and protecting your personal data when you use our services. Here we explain how we use and protect your data. This Privacy Policy relates to the EACCGC site, any of its digital platforms, and any data you provide us. (the "Services").

Please read this Privacy Policy (“Policy”) to understand how the EACCGC treats your personal data while you are using our Services.

**What information do we collect?**

We collect personal data from you when you complete a physical application to become a member of the EACCGC.

We collect information from your Company when they complete an application for membership, and designate you as a recipient of the Services to attend events, place orders, subscribe to the newsletters, respond to a surveys, and participate in any other activity rendered available through the Services.

When ordering or registering with the Services, as appropriate, you may be asked to enter your: name, e-mail address, company, title, billing and mailing address, phone number, and credit card information.

We may collect your data both directly and indirectly. Your IP (Internet Protocol) addresses are automatically logged by our web server. EACCGC uses this information for statistical analysis purposes to better understand how you use the Services. We might use this information to evaluate areas you visit most frequently and the services you look most interested in.

EACCGC may collect, for example, the domain name of your internet provider, your browser type, time zone, language, operating system, date of the visit, URL of the last webpage visited before visiting our Services, URL of the first page you visit after leaving our Services, pages viewed, time spent on a page, click through, clickstream data, queries made, search results selected, history or comments made.

**What is the lawful basis for processing your personal data?**

<b>Purpose of Processing</b>	<b>Types of Personal Data</b>	<b>Legal Basis for Processing</b>
Register for an event provided by the organization	Name, contact details, credit card information, email	Performance of a contract
To fulfil our contractual obligations to our affiliates	Name, email	Performance of a contract
To comply with our legal or regulatory obligations	Name, address, salary details	Legal obligation

To use data analytics to improve our intranet website experience	Your IP address and pages visited on our Site	Legitimate interest – to understand our intranet website use better and to keep it updated and relevant
To fulfill orders for our products and services, or to permit you to access details about your orders for our products and services	Customer and prospective customer contact information collected in connection with an order or an inquiry	Performance of a contract
For use in marketing additional programming and events to your business	Customer and prospective customer contact information	Performance of a contract

**What do we use your information for?**

Any of the information we collect from you may be used in one of the following ways:

Providing our Services to you and fulfilling requests

- To personalize your experience. Your information helps us to better respond to your individual needs;
- To improve our Services. We continually strive to improve our Service offerings based on the information and feedback we receive from you;
- To process transactions;
- To contact you with information about EACCGC’ Services, unless you have requested not to be contacted;
- To send administrative information.

Service improvement and account management

- To improve our Services. We continually strive to improve our Services offerings based on the information and feedback we receive from you;
- To improve customer service. Your information helps us to more effectively respond to your customer service requests and customer support needs;
- To perform statistical analysis on your use of the Services;
- To evaluate our technology and how we can better provide our Services.

Marketing and advertising

- To communicate with you based on your interests or preferences;
- To contact you for marketing reasons, for business updates, or for invitations to events that may be of interest to you.

In certain cases, the collection and processing of data are necessary to comply with local laws. When you provide any personal data to EACCGC, it will be processed in accordance with the applicable laws, which may include retaining and reporting your personal data to official authorities for compliance with tax, customs or other legal obligations.

Although we do provide our sponsors with attendee list information from events you might register for, your information, whether public or private, will not be otherwise sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased Services requested; to administer a contest, promotion, survey or other Service feature; to send periodic emails.

If you provide consent, you can always withdraw your consent, you are not required to give such consent in order to use the Services, and you will not suffer consequences for withholding your consent.

The email address you provide for order processing may be used to send you information and updates pertaining to your order. In addition, we may also use the email address you provide to send you organizational news and updates, and related product or service information.

**Note:** If at any time you would like to unsubscribe from receiving future emails, we include detailed instructions on how to do so at the bottom of each email.

### **Do we use cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow them) that enables the sites or service providers' systems to recognize your browser and capture and remember certain information.

GrowthZone, one of our service provider use cookies to help us remember and process the items in your shopping cart, to understand and save your preferences for future visits, to keep track of advertisements, and to compile aggregate data about site traffic and site interaction so that we can provide better site experiences and tools in the future. We may contract with additional third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly. However, you can still place orders over the telephone or by contacting customer service.

### **Do we share information with Third Parties?**

We may permit third-parties to access your personal data when it is necessary for the third-parties to process data on our behalf in furtherance of our business activities that you have consented to, when the disclosure of such data is in your interest, or when it is required by law. EACCGC will conduct any necessary step to ensure the third-party's reliability and reputation.

### **Consent for transfer to another country**

We may also transfer your data for processing them in countries with a different data protection regulation. Please, bear in mind that such countries may have a different data protection law than yours.

By using our services, or giving us consent when required, you allow us to transfer and retain your personal information in all the different countries where our service providers have their facilities.

#### Members, partners, affiliates and contributors

EACCGC provides a global service. As a result, we may need to share your data with our partners, affiliates and contributors in offices worldwide, including the United States and Europe. We also share attendance data, including name, company, title, and email address with our sponsors as a result of their contributions.

#### Service providers, suppliers

We exchange data with our service providers, suppliers, and subcontractors. We also exchange data with other third parties collaborating with, or acting on behalf of, EACCGC. These persons are strictly forbidden to share this data with others. These persons are also strictly forbidden to share this data for any purposes different than those agreed upon with us.

#### Social media

There are links to social media services where it is possible to publish news, comments and analysis. These services may collect and share your data and disclose it to anyone that may access that page. We invite you to be prudent in using such features.

#### Corporate restructuring

Your data may be transferred to a third-party because of a restructuring or a sale of part or all of our business. As part of these transactions, we would have the right to transfer the information we have gathered through our Services to these third parties. The use or disclosure of such transferred data would still be subject to the policies described in this Privacy Policy. However, any data given after the transfer may be subject to the successor entity's policies.

#### Anonymized data and analytical data

GrowthZone produces and works with aggregated, anonymized and general/statistical data about our Services. GrowthZone may produce such data for research, analysis, and advisory activity.

#### Disclosure for Legal or Preventive reasons

In our sole discretion, we may use, share, or disclose some of your data to address legal concerns or potential liabilities, including but not limited to the following situations:

when we determine that there has been a misuse of the Services, such as unauthorized access, spamming activity, or attacks to our Services.

when we are required to provide access to your data to legal authorities under a specific request in accordance with the applicable law.

### **Data Integrity**

#### Security

Your personal data shall comply with the requirements established by law, respecting the obligation to protect the data confidentiality and secrecy. EACCGC ensures an adequate level of security for the personal data handled via its Services, choosing advanced safeguard measures in order to prevent any alteration, loss or unauthorized access to its Services and to avoid any harm to the personal data subjects.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Database to only be accessed

by those authorized with special access rights to our systems and are required to keep the information confidential.

Please, remember that safety is never 100%, EACCGC cannot and does not guarantee the security or confidentiality of the information collected.

#### Username and password

We may ask you to create a username and password for the Service registration. It is your responsibility to protect such information and to take the appropriate steps to protect against third party access or the disclosure of it. For security reasons, we recommend changing your password every 6 months. In the event you forget your password, we will communicate with you through your registered email address while using the appropriate security procedures.

#### Data retention

We retain your data only for the time necessary to conduct the activities outlined on our Services or to comply with a legal request, unless a longer retention period is ordered or allowed under applicable law. In some cases, we may need to hold data for record-keeping purposes or to conclude the transactions that were started before a request for revision or erasure of data occurs. Finally, some information might reside on our databases, back-ups or similar records without the possibility of being erased.

When we would like to maintain data for longer periods, we may choose to anonymize such information in order to stop the data from being attributed to a particular individual.

#### Enforcement

If you have questions or concerns about the protection of your personal data or this Privacy Policy, please direct them to our contact indicated below.

EACCGC will do its best to solve any query you may have about this Policy or our privacy practices. Our Team will collaborate with the relevant or local data protection and privacy authorities in any Country in which we have offices.

EACCGC reviews its Privacy Policy's periodically and ensures that its staff is familiar with the policy and understands complaint-handling arrangements.

#### Children's online privacy

We do not collect any information from anyone under 13 years of age. Our Services are all directed to people who are at least 18 years old or older.

In addition, we do not process data of children under the age of 16 without the parents' or guardians' consent. We recommend a parent, or a guardian assist when any minor intends to browse our Services.

#### **Linked Websites**

The Services contains links to other sites not related to EACCGC. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

The presence of a third-party's link on our Services does not signify an endorsement of the third-party's data handling practices, nor does it signify that the third-party's practices fall under this Privacy Policy.

We recommend you pay attention to your moving between different services and that you read carefully the privacy statements of each website you travel to.

### *What are your rights?*

**You have important rights that you may exercise to protect your personal data. You may access those rights at any time by contacting us at [eacc@europe-cincinnati.com](mailto:eacc@europe-cincinnati.com)**

You have the following rights concerning your personal data that we collect and process that you can exercise at any time:

- Right of access – you have the right to request a copy of the data that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restrict processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review: in the event that EACCGC refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the process below.

All of the above requests will be forwarded on to other parties holding and processing your data where appropriate.

### Marketing materials

From time to time, EACCGC may send its marketing materials to you. Any customer will be able to stop the sending of such materials by simply following the “opt-out” procedure available through the website, or by contacting us with a direct request. After the opt-out, Privacy Rules may contact you for relevant regulatory information.

### Access to personal data

When you contact us to verify the personal data we have collected about you, which is your right to do, we may conduct some test to ensure your identity.

In addition, EACCGC reserves the right to decline a request when manifestly unfounded or excessive (for example because it is repetitive) and/or to charge fees in consideration of the administrative costs needed for taking the action requested.

### How to access your personal data

If you want more information or further clarification on our use of your personal data, or if you want to exercise any of your rights (get a copy of your data held by the company, ask for the correction or erasure of such information, or stop the use of such information), you may submit a written request to us at the address below asking EACCGC to perform any of these tasks. Please note that a nominal fee may be assessed for each request, consistent with applicable law. In addition, there may be some narrow exceptions to the rights displayed above.

### **Modifications to this Policy**

This Policy is subject to change, and EACCGC may change it at any moment. For this reason, we encourage you to check this page periodically in order to remain updated with it. Our Policy will always indicate the date of the last change.

In addition, any modification to this Privacy Policy will be updated here, along with its effective date, to notify users as required by applicable law.

Please note, continuing to use our Services after the publication of changes on this page indicating a new effective date will be considered as an agreement to be bound by the new changes.

### **How can you Contact Us? (Updated February 4, 2021)**

If you have any questions about our information practices, please contact us by:

Calling us at 513-216-0847

or

writing to us at:

European American Chamber of Commerce, Greater Cincinnati.

P.O. Box 30130

Cincinnati, OH 45230

United States of America (USA)

[eacc@europe-cincinnati.com](mailto:eacc@europe-cincinnati.com)