

## ISSA's Data Privacy Policy

This Data Privacy Policy document (Privacy Policy) outlines how the International Securities Services Association (ISSA) requests, collects and processes data about visitors (Users) to the ISSA website. The policy also explains what precautions are taken to ensure the safety and confidentiality of any personal data that is processed by those accessing both the public and member section of our website.

### I Introduction

ISSA is an Association, incorporated in 1989 as a non-profit association under Swiss law in Zurich, Switzerland. ISSA contributes to the development of the worldwide securities services industry, but does not sell any products or data. ISSA is committed to protecting the privacy of Users of the ISSA website. We only request and collect data from Users that is needed for the specific business use. How much information we may store about Users, depends on the Users' relationship with ISSA.

This policy outlines the data requested, collected, processed and stored based on the following specific business use types:

- All Users of the website
- Users who contact ISSA
- Users who access the Members Section of the website.

Additionally, the document provides information on the precautions taken by ISSA to ensure the security of Users' data as well as the rights and responsibilities of Users with respect to personal information that may identify them.

### II All Users of the ISSA website

This section of the Privacy Policy applies to all Users of the ISSA website.

We do not collect any personal identifying information (Personal Data) about Users while they are surfing the public section of our website, unless information is provided by the User in order to contact us (electronic forms). For information on Personal Data collected about Users who have contacted ISSA, as well as Users who access the Member Section, please refer to sections III and IV of this policy document.

What we collect whilst Users are browsing the public section of our website are the Users' device domain names and which contents were accessed. We also collect aggregate information about Users' visits, for example which contents are accessed most or least often. We use the collected data to analyze how and when the contents of our site are viewed and with the intent of offering Users more relevant data.

We use cookies only to determine the Users' journey on our website (session cookies). These cookies are not linked to any Personal Data, thus Users will not receive any emails from ISSA as a result of visiting our website, unless these are specifically requested by contacting us. In such cases, the Users' data will be retained for the time necessary to process the request and to comply with legal obligations.

If Users wish to deny the use of cookies from this website and not allow cookies to be saved on their computer, Users should change their web browser's security settings to block all cookies from this website.

It should be noted that this Privacy Policy does not extend to third-party websites links from our website. We recommend that – before surfing third-party websites – Users read any privacy policy relating to these websites to learn what data they may collect and how they treat it.

Should Users require more information than is described in this Privacy Policy, they should email their request to [issa@issanet.org](mailto:issa@issanet.org), specifying what additional information they would like to know. Requests will normally be answered within two weeks.

Should Users not agree with the terms of this policy, they should discontinue accessing this website immediately. Should Users receive information from us that they do not find relevant, we provide Users with the opportunity to opt-out and stop receiving emails. Users will find this link at the bottom of our mails.

We periodically update this Privacy Policy and the updated version of the policy is made available on our website. Major changes to this privacy policy will also be announced in our periodic newsletters.

### III Users who contact ISSA

In addition to the information outlined in Section II above, Section III applies to all Users who have been in email, phone or written contact with ISSA or who have completed an electronic form through our website.

To drive solutions, strengthen collaboration and facilitate communication, ISSA is in regular contact with a number of Users, including its members, Working Group participants, marketing and event contributors, ISSA event participants and other interested parties. For this purpose, we may keep track of Users' Personal Data (such as the User name, e-mail address, phone number and company name).

ISSA requests and collects Users' Personal Data if Users:

- are ISSA Member Representatives
- are a member of one, or more, of our Working Groups or Committees
- contribute to ISSA publications or events
- subscribe to our Newsletter
- request, and are given access, to our Member Section (only available to employees of ISSA Member Firms)
- register for one of our events
- are in contact with a representative of ISSA, express interest in ISSA and give ISSA their contact details
- request information about our organization or publications
- fill in electronic forms on our website (contact forms and surveys).

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ISSA may collect, process and store information, for each User including:

- User contact details (such as name, title, firm, mailing and e-mail address, phone number)
- Membership details (such as whether Users are, or have been a member representative, an Executive Board, Operating Committee or Working Group member, if Users have registered to one of our events, if Users have requested access to the Member Section or have subscribed to our newsletter)
- Billing details (such as those for membership fees or attending an event)
- Member Section access details (such as User name, e-mail address, encrypted password, user category, timestamp of last visit)
- Each User's relationship with ISSA.

ISSA uses Users' personal data as follows:

Type of data	Purpose
Name, title, company, e-mail address	To identify the User
Address details and billing address	For letters and invoices
E-mail addresses, phone numbers	To contact the User
E-mail addresses, password, user category	For verifying Member Section login and restricting access to content according to User category
Relationship with ISSA	Determines the amount of interaction with each User and what kind of information could be useful to the User
ISSA events registrations	For making arrangements as to a User's attendance (bookings, billing, dietary requirements, etc.) and to potentially invite a User to similar events

By providing Personal Data to us, Users consent to the collection, storage and processing of this data by ISSA. We collect, process and store all Personal Data in accordance with applicable data protection laws and do our best to ensure that any data collected is accurate.

Users' Personal Data may be stored electronically by ISSA on third-party tools used by ISSA as well as in paper form, where that data has been provided by Users. These tools include, but are not limited to, Salesforce (a CRM tool), Simplifie (a collaboration tool) and Survey Monkey (a survey tool).

#### **IV Users who access the ISSA Members Section of the website**

In addition to the information outlined in Sections II and III above, Section IV applies to all Users who access the ISSA Members Section of our website.

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If Users are granted access to our Member Section, we use the User name, e-mail address and a password to create a User Account and assign each User to a user category to restrict access to content. We also register when Users log onto the Member Section (only the time stamp of the Users' last visits are stored), but do not track which data Users access.

The cookies used in the Member Section are linked to the individual User login data and allow:

- ISSA to check that Users are authorized to access the Member Section and control what contents are displayed to Users
- Users to stay logged in for the duration of the session.

## V Security of User data

We take considerable precautions to make sure that the Personal Data that Users share with us is kept safe and in accordance with this policy and applicable data protection legislation, such as the General Data Protection Regulation. In particular, we seek to protect Users' Personal Data that is transmitted, stored or otherwise processed by ISSA and/or our third-party service providers from accidental or unlawful alteration, destruction, loss, unauthorized disclosure or access. We do not use Users' Personal Data for commercial purposes, nor do we share it with any other organization without requesting your consent, with the limited exceptions of the tools aforementioned under their data privacy agreements. We, and/or our third-party service providers, may disclose information to cooperate with law enforcement or regulatory authorities or otherwise comply with applicable laws and regulations.

## VI User rights with respect to Personal Data

Users can, at any time:

- Ask us to let them know what data we hold on them
- Request that the Users' Personal Data be updated
- Restrict or revoke their consent for ISSA to provide them with information
- Demand that their personal data or parts of it be deleted, unless there is a legal obligation for us to keep it.

To exercise their rights, or if an email has reached them by mistake, Users should write to [issa@issanet.org](mailto:issa@issanet.org) and let us know/specify their request.

## VII User responsibilities with respect to Personal Data

It is the responsibility of Users to review this policy regularly to make sure they are aware of any changes and comply with any changed policy.

If Users submit personal data, it is their responsibility to make sure that the information is correct. Users should also assist us in keeping Personal Data accurate and up-to-date by informing us on any relevant changes.

If Users have been granted access to the Member Section on our website, it is their responsibility to uphold confidentiality of their login data. Users are also responsible for all activities carried out under their Member Section identity.

If Users are part of a mailing list or invitation list which includes personal details of others (e.g. email addresses), Users cannot use this data for any purpose beyond its intent or distribute it themselves.

In the event of any questions about our Privacy Policy, please contact [issa@issanet.org](mailto:issa@issanet.org)

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## International Securities Services Association