



PRIVACY POLICY

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CONTENTS

| | |
|--|----------|
| 1. Introduction | 3 |
| 2. What personal information do we collect about you? | 3 |
| 3. Why do we process personal information about you? | 4 |
| 4. Our lawful basis for processing personal information | 4 |
| 5. Will we share this information with others? | 5 |
| 6. How long do we keep your personal information for? | 5 |
| 7. International transfers | 5 |
| 8. Social media | 5 |
| 9. Your rights | 6 |
| 10. What if you have questions or need to make corrections to your information? | 7 |
| 11. How will we let you know of changes to our privacy notice? | 7 |
| 12. How to contact us | 7 |

1. INTRODUCTION

The Association of Professional Social Compliance *Auditors* ("APSCA" "us", "we"), is a non-profit corporation incorporated in the District of Columbia, the United States of America.

APSCA exists to enhance the professionalism, consistency and credibility of the individuals and organizations performing independent social compliance audits.

Our website is located at www.theapsca.org (the "Website").

We are committed to protecting your privacy and will only use the information that we process about you (your 'personal information') lawfully. This policy is intended to give you an understanding of how and why we use your personal information that you provide to us both on our website or elsewhere.

APSCA, as a member organization, stores and maintains personal information on our members, as well as those who interact with us via the Website or other methods of contact. This data is kept secure and confidential and is used in the normal day to day duties of APSCA.

Please read this policy carefully to understand how we will collect, use and store your personal information.

2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We collect personal information from our members. The personal information we collect can include:

- a) your full name;
- b) City, State, Country Post/Zip Code;
- c) work telephone and/ or personal mobile number(s);
- d) work and/ or personal email address;
- e) employer and role;
- f) information relating to your accreditation(s), skill(s), certification(s), education, degrees
- g) photos of your participation at our events;
- h) records of your correspondence with us;
- i) records of your membership (e.g. the date you joined APSCA and what qualifications you hold);
- j) information you may enter onto the Website (e.g. when contacting us via the online form); and
- k) any other information you may share with us.

We will never collect sensitive personal information (such as health information) without your explicit consent and unless it is absolutely necessary to do so.

There is also information about your computer hardware and software that is automatically collected by the Website. This information can include: your IP address (the unique identifying number of a computer), the browser you use, for example Internet Explorer (IE), Firefox, Chrome etc., APSCA domain names, access times and referring Website addresses. This information is used by us for the operation of the Website, to maintain quality of the service, and to provide general statistics regarding use of the Website.

We also collect information about the use of our website using cookies (see our [Cookies Statement](#)).

Any information we collect from you is via your direct interactions with us, either on the Website or if you communicate with us. We may receive your personal information via your employer, if you are put forward for enrolment.

3. WHY DO WE PROCESS PERSONAL INFORMATION ABOUT YOU?

The information we process about you may be done for a number of purposes and these are detailed under the lawful basis of processing section below.

4. OUR LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION

Under EU and UK data protection law, organizations who operate in the EU or the UK need a 'lawful basis' to process personal information. The law allows for six ways to process personal information (and additional ways for sensitive personal information). Four of these are relevant to the types of processing that [APSCA](#) carries out. This includes information that is processed on the basis of:

- (a) Your consent
- (b) Processing necessary for the performance of a contract with you;
- (c) Processing necessary for compliance with a legal obligation; and/or
- (d) Our legitimate interests. Personal information may be processed if it is necessary for a legitimate interest of the organization using the information, as long as that interest is not overridden by the privacy rights of the individual whose information is being used.

The lawful basis we rely upon to process your personal data may differ for each processing activity. Below, we set out which processing activity is linked to which lawful basis:

| LAWFUL BASIS | PROCESSING ACTIVITY |
|------------------------------------|---|
| Consent | <ul style="list-style-type: none"> to conduct surveys, for example, in relation to our pilot program; to use non-essential cookies when you allow us to do so; and to manage your communication preferences; |
| Performance of a contract with you | <ul style="list-style-type: none"> to administer your membership (e.g. signing you up as a member and handling your membership record). |
| Compliance with a legal obligation | <ul style="list-style-type: none"> to comply with applicable laws and regulations, and requests from statutory agencies; and governance, including delivery of our exempt purposes, statutory and financial reporting and other regulatory compliance purposes. |
| Our legitimate interests | <ul style="list-style-type: none"> for our own internal administrative purposes; delivering services and/or other materials and information you have requested from us; maintaining the membership profile of our members; responding to your requests for information; communicating with you about your membership; to carry out research to find out more information about our members' backgrounds and interests; to improve our member services; for the purposes of any proposed restructuring, acquisition, purchase or merger of any part of our business; administration and operational management, including responding to queries, regarding examinations, working / consultation groups, how to find an audit firm, register to receive newsletter, complaints; member services, including information about how to join APSCA, information about our membership services, the development of new services and processing the payment of fees; and for the purpose of investigating a potential ethical violation. <p>If you would like to change our use of your personal information in this manner, please get in touch with us using the details in the "How to contact us" section below.</p> |

5. WILL WE SHARE THIS INFORMATION WITH OTHERS?

We may share your personal information with third parties, including the following:

- with contractors, suppliers, or other third parties that provide services on our behalf;
- with other members, whom you have given us permission to share information on your accreditations tab or by association with a [Member Firm](#);
- with our professional advisors;
- as part of a sale, merger or acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding;
- pursuant to a court order, or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties; or

On the rare occasion that [APSCA](#) transitions ownership to another organization, you will be given the opportunity to opt-out before any personal information is transferred. [APSCA](#) will not trade or sell personal information with anyone else, nor send mailings on behalf of other organizations. However, we may share information that has been de-identified or aggregated without restriction.

6. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We will keep your personal information for no longer than is necessary for the purposes for which it is processed, in accordance with our internal policies.

The length of time that information will be kept may depend on the reasons for which we are processing the information and, on the law, or regulations that the information falls under such as financial regulations, statutory limitation periods, or any contractual obligation we might have.

Subject to the above, we will typically store information relating to members for 7 years after their last payment or interaction with us.

Once the retention period has expired, the information will be confidentially disposed, permanently deleted, or in some cases archived.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

7. INTERNATIONAL TRANSFERS

If you are based in the EU/UK, please note that, as we are a US based organization, your personal information may be transferred to, and processed in, countries other than the EU/UK, including the United States. These countries may have data protection laws that are different to EU/UK laws.

If we transfer your information outside of the EU/UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the jurisdiction in which the recipients are based ensures adequate protection of personal data subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the "How to contact us" below for more information about the protections that we put in place and to obtain a copy of the relevant documents.

8. SOCIAL MEDIA

Our social media pages can be found in the following places:

 Twitter: https://twitter.com/the_APSCA

 LinkedIn: <https://www.linkedin.com/company/association-of-professional-social-compliance-auditors/>

 Youtube: https://www.youtube.com/channel/UCXGqUeVAxKgmtbZgZ8_FSaw

Twitter

Visit Twitter's Privacy Notice <https://twitter.com/en/privacy> for more information about how Twitter manages personal information, or contact Twitter online at: <https://help.twitter.com/forms/privacy>

LinkedIn

Visit LinkedIn's Privacy Notice <https://www.linkedin.com/legal/privacy-policy> for more information about how LinkedIn manages personal information or contact LinkedIn online at: <https://www.linkedin.com/help/linkedin>

YouTube

YouTube is owned and operated by Google LLC.

Visit Google's Privacy Notice <https://policies.google.com/privacy?hl=en> for information about how Google manages personal data on YouTube, or contact Google online at:

https://support.google.com/policies/answer/9581826?p=privpol_privts&hl=en&visit_id=637515779011092935-303061437&rd=1

9. YOUR RIGHTS

Under European and UK data protection law, data subjects in those jurisdictions have the following rights:

(a) Right of access

You have the right to know what information we hold about you and to ask, in writing, to see your records. We will supply any personal information you ask for that we hold about you within one month of receipt of the request unless an extension is permitted. We will not normally charge you for this. We may ask you for proof of identity as we need to be sure we are only releasing your personal information to you.

This is called a data subject access and can be done by writing to us using the "How to contact us" section below.

(b) Right to be informed

You have the right to be informed how your personal information will be used. This policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

(c) Right to withdraw consent

Where we process your data on the basis of your consent (for example, to send you marketing e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the "How to contact us" section below.

(d) Right to object

You also have a right to object to us processing personal data where we are relying on it being within our legitimate interests to do so (for example, if we are investigating a potential ethical violation). To do this, or to discuss this right further with us, please contact us using the details in the "How to contact us" section below.

(e) Right to restrict processing

In certain situations, you have the right to ask for processing of your personal information to be restricted, for example, if there is some disagreement about its accuracy or legitimate usage.

(f) Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal information deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information (such as your name, email address and your [APSCA](#) membership number) in order to ensure that you are not contacted in the future.

(g) Right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using the details in the "How to contact us" section below.

(h) Right to data portability

Where we are processing your personal information because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

Finally, you have the right to make a complaint to your country's data protection regulatory authority. For example, in the UK, this is the Information Commissioner's Office.

If you would like to exercise any of these rights please contact us using the details in the "How to contact us" section below. Alternatively, if you would like to make a complaint to regulatory authority, you may do so directly.

10. WHAT IF YOU HAVE QUESTIONS OR NEED TO MAKE CORRECTIONS TO YOUR INFORMATION?

We want to make sure that your personal information is accurate and up to date. Please let us know if your details change. We may also use publicly available sources to keep your records up to date (e.g. checking against deceased records). You may also ask us to correct or remove information you think is inaccurate.

You can also opt-out of receiving all or some of our marketing communications or request that we stop processing information about you for certain purposes (e.g. profiling) at any time by contacting us using the details below or updating your communication preferences on your [APSCA](#) profile.

If you are unhappy with the way in which we have handled your personal information, please contact us using the details below. You also may be entitled to make a complaint to the applicable regulatory body in the jurisdiction in which you are located.

If you believe that the information we hold may have been mishandled or a breach in confidentiality has occurred, please contact [APSCA's](#) appointed Data Privacy officer at data.privacy@theapsca.org – who will investigate and escalate to [APSCA's](#) Executive Board Chair as necessary.


11. HOW WILL WE LET YOU KNOW OF CHANGES TO OUR PRIVACY NOTICE?

We may change this privacy notice at any time in our discretion. If we decide to make significant changes to our privacy notice, we will aim to notify you of these changes. We will also post the changes to this page.

12. HOW TO CONTACT US

Please contact us if you have any questions about our privacy notice or information we hold about you:

 Email: data.administrator@theapsca.org

 Phone: +1 630 418 8548

 Or write to us at: 1747 Pennsylvania Ave, Suite 1000, Washington DC 20006 USA



APSCA



ASSOCIATION OF PROFESSIONAL
SOCIAL COMPLIANCE AUDITORS

