

## Privacy Policy for members, candidates and relations (unofficial translation)

This privacy policy concerns the policy of CFA Society Netherlands as well as that of the foundations affiliated with her, Foundation VBA Opleidingsinstituut Morreau and Foundation Register Risk Manager for Financial Institutions, further described as CFA Society Netherlands. CFA Society Netherlands attaches great importance to the protection of your privacy and therefore handles personal data with care. In this document is described how we handle personal data received through digital means (website, app, e-mail) or offline, with regard to our members, candidates, participants of our events and other relations. CFA Society Netherlands complies in all cases with applicable laws and regulations, including the General Data Protection Regulation (GDPR). This implies that we at least:

- process your personal data in accordance with the purpose for which they were provided, these goals and type of personal data are described in this Privacy Policy;
- limit the processing of your personal data to only those data that are minimally required for the purposes for which they are processed;
- ask for your express consent if we need it for the processing of your personal data;
- have taken appropriate technical and organizational measures to ensure the security of your personal data;
- will not pass on personal data to other parties, unless this is necessary for carrying out the purposes for which they were provided;
- are aware of your rights regarding your personal data, to point this out and to respect them.

If, after reading our Privacy Policy, or in a more general sense, you have questions about this or wish to contact us, you can do this via the contact details at the bottom of this document.

### *The objectives of personal data processing*

The objectives of personal data processing are related to the purposes of CFA Society Netherlands, as can be found in the articles of the Association CFA Society Netherlands. The objectives of the association are to (1) promote the profession of investment professional in general and (2) continuous education on and the dissemination of information about the Investment Decision-Making Process, (3) the highest ethical principles, and (4) the realization of professional conduct.

Our society aims to achieve its objectives by, inter alia:

- instructing and training individual members and the general public in the sound and trustworthy principles, practices and conduct;
- guiding, encouraging and aiding the continuing education of professionally engaged individuals;
- supporting the development and establishment, promulgation and maintenance of the CFA Code and Standards for individuals professionally engaged in the Investment Decision-Making Process, and ;
- enforcing the standards as referred to under (iii) above for members;
- providing useful tools, such as the website and the app;
- the publication of the magazine VBA Journal;
- informing members, stakeholders and interested parties via newsletters, website and app.

### *Processing personal data of members, candidates and participants in events and/or educational programs*

Personal data of members, candidates and interested parties are processed by CFA Society Netherlands for the following purpose(s):

- administrative purposes (such as member administration, raising contributions);

- the organization of education and events;
- communication about the educational programs and events, membership and society;
- the publication of newsletters and trade magazines;
- the distribution of information to members, participants and/or sponsors;
- to announce information about stakeholders and activities of the foundation/association through social media, the website and the app (including photos, for example);
- other activities of internal management;
- to better understand your needs;
- to improve our services;
- website visit monitoring;
- to maintain and manage your history of accreditations and qualifications, such as PE registration & diploma registration (a.o. RBA, RMFI);
- to verify your identity.

The basis for processing these personal data is based on the following processing grounds, or 'legal bases' referred to in article 6 of the AVG:

- your approval;
- the data is necessary for the conclusion and/or execution of the agreement between us, or in which you are a party ;
- the data are required to comply with a legal obligation imposed on us;
- the data are necessary for our legitimate interest, or that of another. It concerns the following "justified interests" (provided – after careful consideration - these do not interfere with your rights or interests too much):
  - the society's interest to maintain a relationship with our members;
  - the society's interest to gain more insight into our users and members and their wishes;

the society's interests in the effective delivery of information and services to you and in the effective and lawful operation of our businesses; For the objectives mentioned above, CFA Society Netherlands may request the following personal data from you:

- name, address, residence;
- titles;
- gender;
- telephone number;
- fax number
- professional data (profession and organisation);
- Invoices;
- e-mail address;
- social media data, such as LinkedIn, Facebook and Twitter;
- website;
- date of death;
- dietary requirements;
- data on participation in our educational programs, courses and events;
- IP address and website or app Use;
- photo and video recordings;
- identification documents for the purposes of verifying your name if you are an examination candidate;
- exam results;
- special categories of data, if you wish to share this data with us for the purposes of a reasonable adjustment /special consideration application regarding membership or participation in exams;
- any consents and preferences provided by you;

*Processing personal details of prospect, stakeholder / lobby contacts and/or interested party*

CFA Society Netherlands, according to its statutes, aims to 'promote the profession of investment professional in general'. An important part of this is information provision, such as the dissemination of newsletters, reports, press releases and other publications, and maintaining personal contacts. Personal data of prospects, stakeholders-/lobby contacts and/or interested parties are processed by CFA Society Netherlands for the purpose of this information provision. The basis for the processing of such personal data is your consent: for example verbal consent, issuing a business card or linking using LinkedIn. Another basis constitutes the legitimate interest referred to in article 6 paragraph 1 (f) AVG. The legitimate interest is also the fact that contact with prospects, stakeholders and companies operating in the sector is crucial when gathering and sharing knowledge and viewpoints, which is necessary in promoting the profession of investment professional in general as described in the statutes.

For the above objective(s), CFA Society Netherlands may collect the following personal information from you:

- name;
- company and function;
- address information;
- phone number;
- e-mail address;
- social media data such as LinkedIn, Facebook and Twitter;
- other data shared voluntarily by you.

### *How long do we keep your personal data?*

**We retain your personal data for as long as it remains necessary in relation to the purposes for which it was collected. For examination candidates we hold your data indefinitely as proof of your examination history or your having sat the examination. After ceasing your relationship with CFA Society Netherlands, we may continue to hold your data to enable us to respond to questions or to complaints or to comply with legal or regulatory requirements.**

### *Photo and video images*

CFA Society Netherlands may take pictures and videos of participants during its events and meetings which may be published in, among others, its newsletters, social media and on the website. We rely on justified interest and journalistic use and free news gathering. For journalistic use permission is not required. We are selective and careful in choosing photos and videos for publication afterwards. However, if you object to the use of your image, please contact us using the address at the bottom of this document or inform the photographer. With our professional photographers processor agreements were signed. Participants may also take pictures during events and training sessions. CFA Society Netherlands is expressly not responsible for the use of these photographs.

### *Provision to third parties*

We may share the information you give us with third parties if this is necessary for the execution of the above described purposes.

For example, we use a third party for:

- taking care of the internet environment;
- taking care of the (financial) administration;
- taking care of newsletters and invitations;
- sending printed works, such as our trade journal *VBA Journaal*.

But we also provide information to others than our processors. By means of the website, persons can request information from public registers such as the RBA register, the RMFI register and the members list of CFA Institute. The AVG Personal Data Protection Act requires that persons should give their permission to disclose their personal data to third parties. These registers may therefore be incomplete.

We never pass on personal data to other parties with whom we have not entered into a processor agreement. With these parties (processors), we make the necessary arrangements to ensure the security of your personal data. Furthermore, we will not pass on the information provided by you to other parties, unless this is legally required and permitted. We may also share personal data with third parties if you give us permission in writing. CFA Society Netherlands never sells personal data to third parties.

### *Outside of the EU*

We may only transmit personal data to third countries if that country or organization has an adequate level of protection. The European Commission (EC) has adopted a scheme for the transfer of personal data to the USA. This scheme is called the Privacy Shield. Since your membership with CFA Society Netherlands is commonly accompanied by a membership of the CFA Institute established in the United States and your personal data are managed by the latter, it is important to know that CFA Institute in the United States complies with the GDPR/AVG as well as the Privacy Shield and personal data are only shared via a private section of the website, c.q. the CRM database. You can read the CFA Institute privacy Policy by using the link <https://www.cfainstitute.org/en/about/governance/policies/privacy-policy>. Data from local members, prospects, stakeholders, lobby contacts or interested parties is stored in a secluded area of the CRM database, shared with CFA Institute. To this end, a processor agreement has been put in place with CFA Institute.

### *Minors*

We only process personal data of minors (persons under 16 years of age) if written permission has been given by the parent, caregiver or legal representative.

### *Security*

We have taken appropriate technical and organizational measures to protect your personal data as well as possible against unlawful processing. For example, we have taken the following measures;

- all persons who are able to access your data on behalf of CFA Society Netherlands are obliged to maintain their confidentiality.
- we use a username and password policy on all our systems;
- we use pseudonyms and ensure the encryption of personal data if there is reason to do so;
- we make back-ups of the personal data in order to be able to recover these in case of physical or technical incidents;
- we regularly test and evaluate our measures;
- our employees have been informed about the importance of the protection of personal data;
- Personal data is only shares via cloud applications.

If you have the impression that your data is not properly secured or there are indications of abuse, please contact us directly.

### *Cookies and similar techniques*

We use cookies on our website. This is a small text file that is stored in the browser of your computer, tablet or smartphone on the first visit to this website. We use the following cookies:

*a. Cookies with a purely technical functionality.*

These ensure that the website works properly and that, for example, your preferences are remembered. These cookies are also used to make the website work properly and to be able to optimize it.

*b. Cookies with analysis functionality.*

CFA Society Netherlands uses Google Analytics and its own analysis to measure visits to our website. For example, to know what devices our visitors use the most, so that we can customize our website accordingly. The association has regulated Google Analytics according to the [manual](#) of the [Dutch Privacy Authority](#) (AP). More information about the privacy statement of Google Analytics can be found at <http://www.google.com/intl/nl/policies/privacy/>.

You can opt out of cookies by setting your Internet browser to not store cookies. In addition, you can also delete any information previously saved through your browser's settings. However, by deleting or not allowing cookies, some of the website's functionalities may not work properly.

### *Your rights concerning your data (inspection, rectification, deletion, etc.)*

You have the right to inspect, rectify or delete the personal data that we have received from you. Members can always access and adjust their data through the link <https://www.cfainstitute.org/Account> (click My account on website [www.cfavba.nl](http://www.cfavba.nl)). You can also object to the processing of your personal data (or a part thereof) by us or by one of our processors. You also may ask us to transfer the personal data that you provided us, to yourself or directly to another party. We may ask you to identify yourself before we comply with the aforementioned requests. If we may process your personal data on the basis of consent, you are always entitled to withdraw this consent.

Every request can be addressed to us via [info@cfavba.nl](mailto:info@cfavba.nl). To make sure that a request has been made by you, please send a copy of your identity document with the request. In this copy, make your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and 'Burgerservicenummer' (BSN) black. This to protect your privacy.

### *Costs and deadlines*

In exercising the aforementioned rights, CFA Society Netherlands will not charge the person concerned, except for misuse (unfounded and/or excessive requests). CFA Society Netherlands will give you an acknowledgement of receipt immediately upon receipt of the request and indicate the procedure in this case.

### *Complaints*

If you have a complaint about the processing of your personal data, we ask you to contact us directly. You always have the right to file a complaint with the Dutch data protection authority, this is the supervisory authority in the field of privacy protection.

### *Changes*

Privacy is in full motion, like CFA Society Netherlands itself. Therefore we will need to adjust our Privacy Policy every now and then. We may change this policy if developments give rise to that. The most current Privacy Policy can be found on our website. We recommend that you periodically review this Privacy Policy in order to stay informed of any changes.

### *Questions & contact details*

If you have any questions or comments regarding our Privacy Policy, please contact us!

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