

# Our Privacy Policy

Last updated: January 10, 2021

#### Who we are

The Center for Evidence-Based Management (CEBMa) is the leading authority on evidence-based practice in the field of management and leadership. We are an independent non-profit organization that was founded by an international group of management scholars and practitioners.

## **Our Correspondence Address**

Rapenburg 66 2311 EZ Leiden The Netherlands +31 207 546 419

## How to contact us

We can be reached via <a href="mailto:privacy@cebma.org">privacy@cebma.org</a>

## **Our Privacy Policy**

This Privacy Policy (the "Policy") sets out the obligations of CEBMa with regard to the protection of your personal information and compliance with the General Data Protection Regulation effective 25 May, 2018 (the "GDPR") and explains how information is collected, used and disclosed by CEBMa and applies to information collected when you use or access CEBMa's website, products, services or applications (collectively the "CEBMa Services"), or when you attend a CEBMa event or otherwise interact with CEBMa. CEBMa respects the privacy rights of users and recognises the importance of protecting information collected about you.

If you use the CEBMa Services as part of an entity or oganisation that has an agreement with CEBMa (like your employer or a university), the terms of that organisation's contract for the CEBMa Services may restrict our collection or use of your information more than what is described in this Policy.

Please read the following carefully to understand how we will collect, use and maintain your personal information. This Policy also describes your choices regarding use, access and correction of your personal information.

#### Information we collect

We collect certain information (including personal information) relevant to the services we provide, and the information will be collected and processed in accordance with this Policy. The types of information that we may collect directly from you may include your name, username, email address, city, country, transactional information (including services purchased and billing address), information collected by cookies or other tracking technologies and any other information you may choose to provide. Please be aware that the information that you choose to provide may reveal or identify information that is not expressly stated (e.g. if you choose to provide your picture, your picture may reveal your gender). We also store the files and other information that you upload or provide to us or in connection with the CEBMa Services in order to be able to provide you with the features and functionality of the CEBMa Services.

# **Information collected by Cookies**

We (including service providers who work on our behalf) use various technologies to collect information, to help personalise your online experience and in our electronic communications with you. Cookies are small data files placed on your hard drive or in device memory by a web page server. Cookies are designed to help us improve the CEBMa Services, customise your experience and your preferences, allow you to access and use the CEBMa Services without re-entering your account ID and/or password, understand which areas and features of the CEBMa Services are most popular and count visits.

#### **Use of Information**

We may use the information collected for the limited purpose of providing the CEBMa Services and related functionality and services for which we have been engaged. The information may be used to perform a variety of purposes, including to:

- Provide, operate, maintain and improve the CEBMa Services;
- Enable you to access and use the CEBMa Services, including uploading, downloading, collaborating on and sharing content and emails on your behalf;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Provide and deliver any other services and features you may request, process and complete transactions, and send you related information, including purchase confirmations and invoices;
- Respond to your comments, questions, and requests and provide customer service and technical support;
- Communicate with you about services, features, surveys, newsletters, events and provide other news or information about us;
- Monitor and analyse trends, usage, and activities in connection with the CEBMa Services and for research purposes;
- Investigate and prevent fraudulent transactions, unauthorised access to the CEBMa Services, and other illegal activities;
- Improve the CEBMa Services; and
- For other purposes about which we notify you.

## **Processing Personal Information**

Any and all information collected by us is collected in order to ensure that we can facilitate efficient transactions with third parties including, but not limited to, our customers, partners, associates and efficiently manage our employees and contractors. Your information may also be used by us in meeting any and all relevant obligations imposed by law.

Information may be disclosed within CEBMa in accordance with this Policy. Under no circumstances will information be passed to any individual within CEBMa that does not reasonably require access to that information with respect to the purpose(s) for which it was collected and is being processed.

## **Your Choices**

You may update, correct or request deletion of your information about you at any time by emailing us at <a href="mailto:privacy@cebma.org">privacy@cebma.org</a>. Please note that deletion may not be automatic as it is subject to applicable laws, legal obligations and legitimate business purposes.

## **Your Access Rights**

You may make a request at any time to see the information we hold about you or processes on behalf of a third party. To request this information, please contact us in writing at <a href="mailto:privacy@cebma.org">privacy@cebma.org</a>. Upon receipt of such request, we shall have a maximum period of 30 days within which to respond.

#### **Retention and Deletion**

We will retain your information for as long as your account is active or as needed to provide the CEBMa Services. We will retain and use your information to comply with our legal obligations, resolve disputes and enforce our agreements. At the end of the retention period, we will delete your personal data in a manner designed to ensure that it cannot be reconstructed or read.

#### Information that we share

We do not share information with companies, organisations and individuals unless one of the following circumstances applies:

## With your consent

We will share personal information with companies, organisations or individuals outside CEBMa only when we have your consent to do so.

## For legal reasons

We will share personal information with companies, organisations or individuals outside CEBMa if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable terms and conditions, including investigation of potential violations.
- detect, prevent or otherwise address fraud, security or technical issues.

## **Information Security**

The security of your information is very important to us. Whilst no security is completely secure, we use physical, electronic, and administrative safeguards that are designed to protect your personal information from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. In particular:

- We encrypt many of our services using SSL (secure socket layer)
- We review our information collection, storage and processing practise, including physical security measures, to guard against unauthorised access to systems

• We restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations.

In the event that your personal information is acquired, or reasonably believed to have been acquired by an unauthorised person and applicable law requires notification, we will notify you by e-mail or mail. We will give you prompt notice, consistent with the reasonable requirements of law and we will investigate to determine the scope of the breach and restore the integrity of the data system.

# Transfer of your information to third countries

We have developed and implemented global data security practices designed to ensure that your personal information is appropriately protected. Please note that personal information may be transferred, accessed and stored outside of the European Economic Area ("EEA") as necessary for the use of the CEBMa Services. These countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective). Specifically, our servers are located in the Netherlands, and our third party service providers and partners operate in the EU and the US. This means that when we collect your personal information we may process it in any of the countries where our service providers are located. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information. The Standard Contractual Clauses are available upon request. We have implemented similar appropriate safeguards with our third party service providers and partners and further details are available upon request. By providing your personal information you consent to us transferring your personal information to third party entities that provide services to CEBMa.

### **Sensitive Information**

We ask that you do not send us, and you do not share any sensitive personal information (e.g., government-issued or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

# **Children's Privacy**

None of our services are directed to individuals under 16. We do not knowingly collect information from individuals under 16 nor promote or market our services to minors. If you believe that we have mistakenly or unintentionally collected information of a minor without appropriate consent, please notify us at <a href="mailto:privacy@cebma.org">privacy@cebma.org</a> so that we may immediately delete the information from our servers and make any other necessary corrections.

#### **Contact Us**

Any questions about this privacy policy should be addressed to <a href="mailto:privacy@cebma.org">privacy@cebma.org</a> or to CEBMa at Rapenburg 66, 2311 EZ Leiden, The Netherlands, Attention: Privacy Officer.

# **Policy Updates**

We may update this Policy from time to time. In the event we make any material changes that reduce your rights or our obligations under this Policy, we will post a prominent notice in this section of this Policy notifying you when it is updated.

# **Implementation of Policy**

This Policy shall be deemed effective as of 10-01-2020. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved & authorized by:

Name:	Eric Barends
Position:	Managing Director
Date:	January 10, 2020
Signature:	Esmi