

This Web site (the "Site") is owned and operated by Allinial Global. Allinial Global is concerned about your privacy on the Internet and is providing the following information concerning privacy issues pertaining to this Site.

Protecting the privacy of our users is important to Allinial Global (sometimes referred to in this Policy as "we," "our" or "us"). We hope the following statement about the information we collect from the [www.allinialglobal.com](http://www.allinialglobal.com) website and associated webpages and data collection forms (collectively, the "Site") including, without limitation, those webpages available only to Allinial member firms (each, a "Member") via the Members'-only portal (the "Member Portal"), will help you understand how we collect, use and safeguard the personal information provided to us on the Site and through the Portal by the users of the Site and Member Portal (such users and Members sometimes referred to in this Policy as "you" or "yours").

This Privacy Policy (the "Policy") is part of our [Terms of Service](#) (together with this Policy, collectively, the "Terms"). By using the Site and Member Portal, you acknowledge that you have read and agree to this Policy and consent to the collection, use, processing and storage of your personal information as described in this Policy. If you do not agree with this Policy, you may not use the Site or Member Portal.

We reserve the right to change this Policy at any time by posting revised Policy on the Site or by sending an email to the last email address you gave us, so we encourage you to review this web page periodically. The changes will be effective immediately when posted. Your use or continued use of the Site or Member Portal following the posting or email notification of any changes to these Terms will constitute your acceptance of the changed Policy.

**A Special Note for International Visitors to our Site: Much of our computer systems are currently based in the United States, so your personally identifiable information will be processed by us in the United States, where data protection and privacy regulations may be different than other parts of the world, such as the European Union. If you visit the Site or use the Member Portal as a visitor from outside the United States, you are agreeing to the terms of this Policy, and you will have consented to the transfer and processing of all such information in the United States, which may not offer an equivalent level of protection of that in the European Economic Area ("EEA") or certain other countries. For further information regarding our compliance with, and your rights under, the European General Data Protection Regulation 2016 (679) ("GDPR"), please see the section below titled "Additional GDPR Privacy Disclosures".**

## **Summary of Recent Changes**

**What's New as of 7/14/2021:** We recently changed our Privacy Policy to, among other things, reflect compliance with our obligations under the European Union (EU) General Data Protection Regulation (GDPR). The following is a summary of key changes:

**Transparency:** We've provided additional clarity regarding the information we collect from Customers, Members and Non-Members and how we process this information. We've also explained the choices and control individuals have over their information.

**Data Control:** We've described how individuals can (i) access, correct or delete their personal data from our systems; and (ii) provide or withdraw consent, as appropriate.

**Readability:** We've updated our Privacy Policy to make it easier to understand by re-organizing it and using plain English.

Last modified 07/14/2021

## **Visiting the Site.**

You can view many portions of the Site anonymously and without creating an account. In this case, we may collect anonymous information (i.e., information that cannot, separately or combined, be used to personally identify you) about your visit as set forth below. If you use or otherwise access the Member Portal or submit responses to interactive forms we may issue, you may provide certain personally identifiable information, which we may collect. Additional details on the specific information we collect and how we use the information is provided below.

## **Collection and Use of Anonymous Information.**

When you visit the Site anonymously (i.e., without logging in), we may automatically collect anonymous information about your visit that will not be used to personally identify you. This information may include, but is not limited to, your IP address, operating system, client type, whether you came to our Site from one of our advertisers, whether you have previously visited our Site, how long you stayed on our Site, what you viewed on our Site and browser type and version. This information is used for administrative purposes, such as to generate usage statistics, to help diagnose problems with our server, to administer the Site, and to ensure that the Site are accessible to the widest possible audience. Information collected while using the Site anonymously is never tied to a user account or otherwise associated with the identity of a user.

We may also track and analyze non-identifying and aggregate usage and volume statistical information from all Site and Member Portal users, described in the Terms under "Service Metrics" (collectively, the "Aggregate Information"). The Aggregate Information is used to help us diagnose technical problems, administer the Site and Member Portal, and improve our offerings and marketing. The Aggregate Information is never linked or otherwise associated with any personally identifiable information that we may collect.

We also use cookies to track affiliates and to enhance features of the Site. For further information on our use of cookies, please read the section below headed [Cookies and other Tracking Technology](#).

## **Collection and Use of Personal Information.**

### Collection of Personal Information

An account is required to access the Member Portal. To create an account, you will be asked to provide (by us or the Member with which your account is associated) personally identifiable information about yourself, including, without limitation, your name, association name (if applicable), firm name, address, telephone number and e-mail address. This information is associated with your account. You will also be required to use a username and password to help restrict access to your account.

We will also collect your personal information if you interact with our Site (e.g. via survey responses, message board posts or chat messages) or participate in our services, such as event registration and check-in, referral services, or request information regarding our products and services.

We use your personal information to create your account, administer the Site and Member Portal, identify account holders, provide you access to your account, process your requests for services (such as, but not limited to, registration for events), and provide customer services to you with respect to such requests for services, send you important communications and as otherwise described below.

### Other Uses of Your Personal Information:

We may use your personal information to periodically send information that we think you might find of interest from Allinial or its affiliates such as new services or programs, special offers, or other important service changes.

We may also use personal data of users to analyze how our websites are accessed, personalize your browsing experience and present products or features that may be more applicable to you, identify website technical problems, or to discover, investigate and remediate fraudulent or illegal activity.

You always have the option to opt out of our internal marketing communications by contacting us at [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com) or by following the opt-out procedure outlined in such communications. Please note that opting out of receiving these communications will not remove your personal information from our files and we will still contact you as necessary to provide you with services and products you have requested.

### Third Parties:

We do not sell, share, or rent your personal information to third parties for purposes other than as discussed below. We will only provide your personal information:

- to certain third-party providers whose software or services interface or otherwise may receive information from, or provide information to, our services, but only as necessary to provide you with the products and services you have requested from us;
- to our third party vendors who provide services on our behalf. These services may include, but are not limited to, customer or technical support, marketing services and website analytics. We will only permit these third parties to access, use and maintain the information that they need in order to provide these services on our behalf and subject to confidentiality obligations. They are prohibited from using the information for any other purpose;
- if you are an employee or representative of a Member, we may provide your firm name and contact information and basic resume data (as provided by you to us) to other Members or referral partners if you participate in our email list, discussion forums, member directory or referral services (or any similar Member services we may offer from time to time);
- to a third party that may acquire our business; or
- to comply with any legal obligation, subpoena or other court order, to cooperate with appropriate law enforcement agencies and other parties involved in investigating claims of illegal or inappropriate activity, and as necessary to enforce any of our Terms or to protect the rights, property or safety of our systems and network for the purposes of fraud protection and credit risk reduction.

### Sensitive Data

Allinial does not receive or process any of the following types of sensitive personal information unless required to by law: race or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic biometric data, health or mortality, sex life or sexual orientation data.

### **Protection of Your Personal Information.**

We take your privacy and the protection of your personal information very seriously. While no service provider can guarantee absolute security when communicating over the internet or wireless networks, we are committed to taking steps to help secure any personal information that may be in our possession. For example, we use electronic security measures, including encryption, passwords, and SSL network connections, all of which are reasonably designed to help protect your personal information from unauthorized access or disclosure, consistent with industry standards.

You are solely responsible for maintaining the secrecy of any password used to log in, if any, and you should always be mindful and responsible whenever disclosing

information online that the information is potentially accessible to the public, and consequently, could be collected and used by others without your consent.

## **Additional GDPR Privacy Disclosures.**

This section applies only to users visiting the Site from the EEA. Definitions of certain terms (including but not limited to Data Subject, Personal Data, Processing, Legal Basis, Data Processor, Data Controller) within this notice are defined under Article 4 of the GDPR, which can be found here: GDPR Definitions. [\[https://gdpr-info.eu/art-4-gdpr/\]](https://gdpr-info.eu/art-4-gdpr/)

### Legal basis for processing personal information (EEA only)

If you are from the EEA, our legal basis for collecting and using your personal data described above will depend on the personal data concerned and the specific context in which we collect it. This notice provides mandatory information as required under Articles 13 and 14 of the GDPR regarding the transparency of data processing of your personal data as the Data Subject.

Allinial will act as a Data Processor where your employer or principal is our Member acting as Data Controller. Under written contract, the Data Controller will pass personal data of their employees or agents to us to provide such employees with products and services in connection with the Member's business and association with Allinial. It is this contract that forms the "Legal Basis" for the processing of personal data carried out by Allinial in these circumstances.

Allinial will become a Data Controller if it collects additional personal data directly from you only where we have your consent to do so, and where we need the personal data to provide you with products or services you have specifically requested, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal data in question.

If we ask you to provide personal data to comply with a legal requirement or to provide you with products or services, we will make this clear at the relevant.

Similarly, if we collect and use your personal data in reliance on our or a third party's legitimate interests and those interests are not already listed above (see the ["Collection and Use of Personal Information"](#) section), we will make clear to you at the relevant time what those legitimate interests are.

Allinial acts as a Data Controller for any personal data held regarding its own employees, and legally processes this data under its employment arrangements with those Data Subjects.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the [“How to Contact Us”](#) section below.

### Your Privacy Rights as an EEA Person

In addition, if you are from the EEA, you may have broader rights to access and delete your personal data, to object to or restrict processing of your personal data, or request portability of your personal information.

To make such requests, you can send an email to [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com) or write to us at the mailing address in the [“How to Contact Us”](#) section below. We will consider and handle all requests in accordance with applicable laws.

If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

You also have the right to complain to your local data protection authority at any time. In general, when processing personal data to provide our products and services, we do so only on behalf of our EEA Members and in accordance with their instructions. This means that if you wish to access, review, modify or delete any personal data we process on behalf of a Member, under applicable EEA law or otherwise, you should contact that Member with your request. We will then help them to fulfill that request in accordance with their instructions.

For EEA Data Subjects, Allinial has adopted the following principles to govern its collection and processing of Personal Data:

- Personal Data will be processed lawfully, fairly, and in a transparent manner.
- The Personal Data collected will only be those data points specifically required to provide requested products or services to the applicable Member or Data Subject or to enable such Member or Data Subject to participate in our Site or products or services. Such data may be collected directly from the Data Subject or provided to Allinial via his /her employer. Such data will only be processed for that purpose.
- Personal Data will only be retained for as long as it is required to fulfill contractual requirements, or to provide products and services to our Members.
- Personal Data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data will be accurate and, where necessary, kept up to date.
- The Data Subject has the right to request from Allinial access to and rectification or erasure of their personal data, to object to or request restriction of processing

concerning the data, or to the right to data portability. In each case such a request must be put in writing and sent to [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com).

- Personal Data will only be processed based on the legal basis as explained above, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which will always take precedent. If the Data Subject has provided specific additional Consent to the processing, then such consent may be withdrawn at any time (but may then result in an inability to fulfil travel requirements).
- Allinial will not use personal data for any monitoring or profiling activity or process and will not adopt any automated decision making processes.
- The Data Subject has the right to make a complaint directly to a supervisory authority within their own country.

Allinial's data protection compliance is supervised by:

Richard Curry, Senior Developer

Allinial Global

1745 N. Brown Rd.

Suite 350

Lawrenceville, GA, 30043, USA

Phone: 1 (800) 282-3680

Fax: 1 (770) 279-4566

By email: [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com)

### **Submitted Content.**

By submitting or posting information, materials or content via the Site or the Services, you agree that we can further distribute such content as described in the Terms under "Submissions." You also agree that we may collect and use non-personally identifiable data about your use as noted in the Terms under "Site and Service Metrics." You agree that you have no expectation of or right to privacy with respect to such Submissions or Metrics Data, except for any limits on our ability to use or distribute such content as set forth in the Terms. The terms of this paragraph do not apply to personal information you submit to us via the Site or the Services, which we will use only as described in this Privacy Policy.

### **Cookies and other Tracking Technology.**

We use cookies or similar automatic data collection technologies as individuals interact with our Site to collect certain information about their equipment, browsing actions and patterns, including:

- Details of your visits to the Site, such as the date and time you access the Site, length of time you spend on our Site, websites you visited before or after Site, the resources and content that you access and use on the Site; and
- Information about your computer and internet connection, such as your IP Address, computer type, screen resolution, language, Internet browser type and version.

Below are the technologies we use for automatic data collection. We do not use any of these technologies to collect information from Members for marketing or advertising purposes.

### Browser Cookies

A cookie is a small file placed on a computer hard drive. Web browsers can be configured to restrict or entirely block cookies, to configure cookie notification settings and/or to delete cookies already present on the browser or device. Information on how to do this is provided by the web browser's help/reference section. Limiting or restricting certain types of cookies may prevent you from using certain portions of our Site, depending on how the browser settings are configured. For example, event registration cannot be completed successfully if cookies are disabled in the web browser. Unless the browser setting has been adjusted so that it will refuse cookies, our system will issue cookies when the browser interacts with our Site. For more information about cookies and how to disable them, see [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Session Cookies and Persistent Cookies

A "session" cookie lasts for a single browser session only and is deleted when the user closes the web browser. Session cookies allow website operators to link the actions of a user during a browser session. A "persistent" cookie remains on the user's device (even while powered off) until it expires or is deleted. A persistent cookie will be reactivated when a user returns to the website which posted the cookie. We use persistent cookies to help customize your web experience when you return to a web page or our website.

Neither of these cookies can read or access other cookies or any data from a user's hard drive. Further, neither of these cookies alone will personally identify a user; however, a cookie will recognize a user's individual web browser or device through an IP Address, browser version, operating system and other information, and individuals who log in to their Member Portal will be individually identifiable to particular Site using session cookies.



At this time, we do not respond to browser “do not track” signals, as we wait for a uniform standard put forth by regulators or the privacy industry. Allinial Global earnestly considers an individual’s independent right to determine how their personal data is processed and continues to monitor developments in this area.

You can learn about how you can adjust your browser’s settings to limit or disable cookies and other tracking technologies by visiting the section below titled ["Third Party Analytics Providers."](#)

### **Third Party Analytics Providers.**

We use third party analytics providers, including Google and others, to collect information about the usage of our Site and enable us to improve how these Site work. The information allows us to see the overall patterns of usage on the Site, helps us record any difficulties you have with the Site, shows us whether our advertising is effective or not, and allows us to use responses to advertisements to optimize ad performance. Google Analytics use cookies and other similar technologies to collect information about the usage of our Site and to report website trends to us, without storing any personal data on external third-party analytics provider platforms. See below for more information, or to opt out of these practices:

You may opt-out of Google Analytics by clicking here <https://tools.google.com/dlpage/gaoptout>.

### **Links to Other Sites.**

Our Site may contain links to, or incorporate or utilize, Third Party Services as described in the Terms under “Third Party Sites and Services.” We provide access to Third Party Sites and Services as a convenience to our users, and our provision of the same is not intended as an endorsement of or referral to the Third Party Sites and Services.

This Policy applies to this Site and the Member Portal only. Your use of Third Party Site and Services is be governed by their own privacy policies and procedures. We assume no responsibility or liability for the privacy practices of any Vendor or operator of Third Party Site and Services. We strongly recommend that you carefully read the privacy statements, notices and terms of service of any Vendor Member Portal and Third Party Site and Services to understand how your information will be handled.

### **How to Access, Correct or Delete Your Information.**

In various countries, including countries in the EEA, upon their request, users have the right to access their personal data and, if necessary, have it amended, deleted or restricted. You can also ask for some types of personal data to be delivered to them, or another organization they nominate, in a structured and machine-readable format.

Where we process your personal data on the basis of your consent, you have the right to withdraw your consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. You also have the right to complain to a supervisory authority for data protection in the country where they live, or where they work – although we hope that we can assist with any queries or concerns you have about our use of your personal data.

If you have an account with us, you can view and modify the personal information on our systems by visiting the “My Account” portion of the Member Portal/contacting us at [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com). You can also ask to review any of the personal information that we have retained, how we have used it, and to whom we have disclosed it at any time by contacting us as indicated below under the heading [“How to Contact Us”](#). We will endeavor to respond to all requests in a timely manner.

Note that Allinial processes data it receives from its Members under the direction of its Members and has no direct control or ownership of such personal data. Members are responsible for complying with any regulations or laws requiring notice, disclosure or obtaining consent prior to transferring the data to Allinial for processing purposes. Any user that is an employee or agent of a Member that seeks to access, correct or delete data, should direct their inquiry to its Member. If the Member requests that we remove the personal data of its user to comply with data protection regulations, we will process this request within 30 days.

We will not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. In such instances, we will inform you or the Member about the legal obligations that prevent us from fulfilling the request.

We will maintain an audit history of any requests to access, correct or delete personal information to maintain a record of compliance with regulatory requirements.

### **Children's Privacy.**

As addressed in the federal Children's Online Privacy Protection Act (COPPA) and associated rules, we do not knowingly collect or maintain any personal information from anyone under the age of 13. FURTHER, BY USING THE APPLICATION, YOU ARE ATTESTING THAT YOU ARE 18 YEARS OF AGE OR OLDER.

We encourage parents and guardians to take an active role in their children's online activities and interests. If you are a parent or guardian and you believe that your child has provided personally identifiable information on our Site, please contact us at [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com) so that we can delete the child's information.

### **CALIFORNIA PRIVACY RIGHTS**

Once a calendar year, California residents who provide personal information in obtaining products or services for household use may request and obtain from us information about the customer information that we shared, if any, with other businesses for their direct marketing uses. To request such information, please contact us at [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com).

### **How to Contact Us.**

Questions about this Policy, the Site or Member Portal should be addressed to:

Allinial Global

1745 N. Brown Rd.

Suite 350

Lawrenceville, GA, 30043, USA

Phone: 1 (800) 282-3680

Fax: 1 (770) 279-4566

By email: [rcurry@allinialglobal.com](mailto:rcurry@allinialglobal.com)