

## PRIVACY POLICY

### 1. WHO WE ARE

This is the privacy policy (“**Policy**”) of GCC Board Directors Institute (“**GCC BDI**”, “**we**”, “**our**” or “**us**”).

GCC BDI is a data controller and is committed to protecting the personal data provided to us. This means information that identifies you personally such as your name, contact details or data that can be linked with such information in order to identify you.

Please take the time to read this Policy as it explains how we collect, use and store any personal data and the rights you have in relation to the protection of your personal data. If at any time, you have any concern or questions about your personal data, please let us know at [getinvolved@gcbdi.org](mailto:getinvolved@gcbdi.org).

### 2. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

GCC BDI collects certain personal data in providing its services. The personal data we may collect about you is listed below:

- **Contact details:** name, address, telephone number and email address;
- **Age:** your date of birth
- **ID number or passport** for exam registration only
- **Financial:** credit card details, billing address, and bank account information;
- **CV:** education and employment history, job title, qualifications and professional associations;
- **Demographic data:** nationality and gender;
- **Correspondence and contractual data:** any information you provide in your correspondence with us and details about any products or services we provide you; and
- **Cookies:** Cookies are small bits of data cached in a user’s browser. This site utilises cookies to determine whether or not you have visited the home page in the past. However, no other user information is gathered.

This data can be gathered when feedback or e-mails are sent to GCC BDI, when you register for services or to attend an event, express interest in becoming a member or make purchases via the site.

We also collect certain anonymous data regarding your usage of this site including type of browser and length of visit to the site. This data does not personally identify users, by itself or in combination with other information, and is gathered to improve the performance of this site.

### 3. WHERE WE COLLECT PERSONAL DATA FROM

We collect personal data directly from you, however where we are permitted to do so under applicable local laws, we may combine information that you have provided to us with other information that we already hold about you and which we have collected for a compatible purpose.

### 4. HOW WE USE YOUR PERSONAL DATA

We collect and process your personal data for a range of purposes. Where we process your personal data, we will have one or more of the below legal basis for processing your data:

- where we have a legal obligation, including:
  - to comply with laws and regulations that apply to GCC BDI; and
  - to establish, defend and enforce our legal rights.
  
- where we have your consent, including:
  - to carry out marketing activities and notify you of products or special offers that may be of interest to you;
  - sending our newsletter; and
  - we may also from time to time ask you for your consent for other purposes, which we will explain to you at that time.
  
- to provide a requested service or in relation to a contract with you including:
  - to manage our relationship with you including responding to your queries;
  - to manage your account;
  - to keep you informed about your order status and to process orders;
  - to process any payments; and
  - to authenticate the identity of individuals contacting us.
  
- where it is in our legitimate interest as follows:
  - internal training and quality assurance purposes;
  - to develop and carry out marketing activities;
  - for statistical purposes for improving our site;
  - to carry out surveys;
  - to organise events;
  - to host and maintain our site;
  - for risk management, information security and disaster recovery purposes;
  - to identify potential members;
  - research activities and administration;
  - preparing our Annual Report;
  - maintaining the Directors' Register; and
  - for recruitment.

Except as otherwise stated below, we do not sell, trade or rent your personally identifiable data collected on the site to others.

## **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We publish all individual members' names on GCC BDI's site. The register of individual members is also available for inspection by any member or officer of GCC BDI, upon request.

We will disclose your delivery information to third parties for order tracking purposes or to process your cheque or money order, as appropriate, fill your order, improve the functionality of our site, perform statistical and data analysis, deliver your order and deliver promotional emails to you from us. For example, we must release your mailing address information to the delivery service to deliver products that you ordered.

We may also share your personal data with third parties who perform functions on our behalf or provide services to us such as professional advisors (such as accountants, external auditors, lawyers, IT consultants, faculty, banks, examination centres and awarding bodies such as the Financial Academy and social media networks.

We may use non-personal "aggregated data" to enhance the operation of our site, or analyse interest in the areas of our site. Additionally, if you provide GCC BDI with content for publishing or feedback, we may publish your user name or other identifying data with your permission.

GCC BDI may also disclose personally identifiable data in order to respond to a subpoena, court order or other such request. We may also provide such personally identifiable data in response to a law enforcement agencies request or as otherwise required by law. Your personally identifiable data may be provided to a party if GCC BDI files for bankruptcy, or there is a transfer of the assets or ownership of GCC BDI in connection with proposed or consummated corporate reorganizations, such as mergers or acquisitions.

All credit/debit cards' details and personally identifiable data will NOT be stored, sold, shared, rented or leased to any third parties. GCC BDI will not pass any debit/credit card details to third parties.

## **6. HOW LONG WE KEEP YOUR PERSONAL DATA FOR**

We will only keep your personal data for as long as it is necessary for the purposes it was originally collected, unless we have a legal or regulatory reason to keep it for a longer period. Once the relevant retention period is complete, we will securely erase your personal data.

For more information on retention periods, please contact us at [getinvolved@gcbdi.org](mailto:getinvolved@gcbdi.org).

## **7. INTERNATIONAL TRANSFERS**

We may transfer your personal data, outside of the DIFC, specifically to the US, where we store data using cloud service providers including Amazon Web Services. Where we transfer any personal data, outside of the DIFC, we will (i) ensure that an adequate level of protection for that personal data is ensured by applicable data protection laws and (ii) in the absence of an adequate level of protection, provide appropriate safeguards such as the Standard Contractual Clauses ("**SCCs**") and/or (ii) enter into or establish any other appropriate instruments or undertakings required under applicable data protection laws to effect such data transfer without breach of such applicable data protection laws.

## **8. AUTOMATED DECISION-MAKING**

We do not carry out automated decision-making, including profiling.

## **9. SECURITY**

GCC BDI takes appropriate steps to ensure data privacy and security including through various hardware and software methodologies. However, [WWW.GCCBDI.ORG](http://WWW.GCCBDI.ORG) cannot guarantee the security of any information that is disclosed online.

## 10. OTHER WEBSITES

**GCC BDI is not responsible for the privacy policies of websites to which it links. If you provide any information to such third parties different rules regarding the collection and use of your personal information may apply.** We strongly suggest you review such third party's privacy policies before providing any data to them. We are not responsible for the policies or practices of third parties. Please be aware that our sites may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those websites linked to our site are not covered by this Policy. These other sites may send their own cookies or clear GIFs to users, collect data or solicit personally identifiable data. We cannot control this collection of data. **You should contact these entities directly if you have any questions about their use of the data that they collect.**

## 11. MINORS

GCC BDI does not knowingly collect personal data from minors under the age of 18. Minors are not permitted to use the [WWW.GCCBDI.ORG](http://WWW.GCCBDI.ORG) site or services, and we request that minors under the age of 18 not submit any personal data to the site. Since data regarding minors under the age of 18 is not collected, GCC BDI does not knowingly distribute personal data regarding minors under the age of 18.

## 12. YOUR RIGHTS

By law, you have a number of rights regarding your personal data in certain circumstances. Please contact us at the below details to exercise any of your rights:

Email: [getinvolved@gcbdi.org](mailto:getinvolved@gcbdi.org);

Telephone: +971 (4) 554 7967

Generally, we will respond to your request within one month, however if your request is complex and requires additional time, we will let you know as soon as possible.

	<b>RIGHTS</b>	<b>WHAT DOES THAT MEAN?</b>
1.	To access	You have the right to obtain access to your personal data that we are processing, as well as certain other data about how we process your data. Please see our Data Subject Access Request Form in Appendix 1
2.	To be informed	You have the right to be provided with clear, easily understandable and specific information about how we handle your personal data as found in this Policy.
3.	To object to processing	In certain circumstances, you have the right to object to processing including for direct marketing.
4.	To rectification	If your personal data is inaccurate or incomplete, please let us know as you are entitled to have your personal data corrected. Where we have disclosed your personal data to any recipients in the course of our relationship with you, we may communicate the rectification request to them.

5.	To erasure	In certain circumstances, you may have the right to the deletion or removal of your personal data. Where we have disclosed your personal data to any recipients in the course of our relationship with you, we may communicate the erasure request to them.
6.	To restrict processing	In certain circumstances, you may have the right to have us restrict the processing of your personal data. For example 'blocking' any further use of your personal data.
7.	To data portability	You have the right to have your personal data transferred. For example, if you obtain similar services from another organisation, you can request that we transfer your personal data in a secure manner to that organisation.
8.	To withdraw consent	Where you have provided your consent for the processing of your personal data, you can withdraw your consent at any time. This will not make any prior processing unlawful but it does mean that no further processing will be undertaken. This includes withdrawing consent for marketing.
9.	To non-discrimination	In certain circumstances, you have the right to not be discriminated against for exercising any of your data subject rights.
10.	To lodge a complaint	You have the right to lodge a complaint about the way we handle your personal data with the relevant data protection regulator.

### 13. MODIFICATIONS OF THE PRIVACY POLICY

This Policy would be changed or updated occasionally. Therefore, you are encouraged to frequently visit these sections in order to be updated about the changes on the website. Modifications will be effective on the day they are posted. If we make any material change to this Policy, we will inform you of these changes by our normal means of communicating with you, including by email, or by post.

## Appendix 1

### Data Subject Access Request Form

<b>1. Details of the person requesting the information.</b>	
Full name:	
Address:	
Telephone number:	
Fax Number:	
Email:	
<b>2. Are you the Data Subject?</b>	YES/NO
<b>(a) IF YES PLEASE COMPLETE THIS SECTION. ELSE PROCEED TO SECTION (b)</b>	
If you are the Data Subject please supply evidence of your identity i.e. ID card or Passport.	
Please tick appropriate box	
I am a current/former member of staff	
I am a current/former member	
I am neither of the above	
<b>Please now go to question 5.</b>	
<b>(b) IF NO</b>	
Are you acting on behalf of the Data Subject with their written authority? If so, that authority must be enclosed.	
Please also state the relationship of the Data Subject to GCC BDI:	
The Data Subject is a current/former member of staff	
The Data Subject is a current/former member	
The Data Subject is neither of the above	
<b>Please now go to questions 3 and 4.</b>	

<b>3. Details of the Data Subject (if different from 1.)</b>	
Full name:	
Address:	
Telephone number:	
Fax Number:	
Email:	
<b>4. Please describe your relationship with the Data Subject that leads you to make this request for information on their behalf.</b>	
<b>5. If you wish to see only certain specific document(s), please describe them.</b>	
<b>6. If you would like a more general search, please note that GCC BDI is able to search the following sections for personal data. Please indicate the sections that you would like searched:</b>	
• Members Register	
• Directors Register	
• Human Resources	
• Finance	
• Administrative files and information	
• Other	
<b>7. Declaration</b>	
<p>I, ....., certify that the information given on this application form is true. I understand that it is necessary for GCC BDI to confirm my/the Data Subject's Identity and it may be necessary for more detailed information to be obtained in order to locate the correct information.</p> <p>Signed:.....</p> <p>Date:.....</p>	

Please return the completed form to the Executive Director, GCC Board Directors Institute, 2201 South Tower, Emirates Financial Towers, DIFC, Dubai, UAE
or send by email to <a href="mailto:getinvolved@gcbdi.org">getinvolved@gcbdi.org</a>

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