

▶ Enabling a secure, connected future ◀

Trusted Connectivity Alliance Privacy Policy

# **Privacy Policy**

## **Data Protection Privacy Policy**

### (EU GDPR Compliant)

Trusted Connectivity Alliance is committed to protecting the privacy of its members and those who access and use Trusted Connectivity Alliance documentation and resources on www.Trusted Connectivity Alliance.org (the website). We are also committed to complying with our obligations under the EU's General Data Protection Regulation (GDPR) for data collected in the European Union. The purpose of this Privacy Policy is to inform our members and you, the user, about the data we collect, how it is processed, the purpose for collecting it and the rights you have regarding the processing of such data. By using this website, you agree to be bound by the terms defined in this Privacy Policy. If you have any questions, you may contact the <u>Trusted Connectivity Alliance Secretariat</u> (see For More Information below).

#### **Data Collected and Cookies Collected**

Trusted Connectivity Alliance is the sole owner of the information collected on the website and collects personal contact information (name and email address) when a user completes and submits the "Contact Us" form found <a href="https://example.com/here">here</a> on the website. Additionally, Trusted Connectivity Alliance collects personal contact information (name and email address), company contact information (address, primary contact person, phone number, email address), and company details that help us determine whether you may be considered for membership (e.g. whether you are a SIM manufacturer when applying for membership/strategic partnership or determining your company size when applying as a Subscriber).

Currently, we do not collect cookies on our website.

#### How Personal Data Is Collected

Your data is communicated to us by your active intervention.

We collect personal data in one of two ways: through the website and from membership application forms. Personal data collected on the website only occurs when a user a) completes and submits a "Contact Us" form or b) submits comments or feedback on a given specification. Personal data collected from a membership application form is collected only after a potential member downloads the membership application form (this includes Subscriber applications), completes the form and sends it to the Trusted Connectivity Alliance General Secretariat for processing and approval.

## **How Personal Data Is Processed**

The personal data we collect may be used for one of several purposes. These include:

- For membership purposes:
  - Membership administration
  - o Provisioning of member benefits
  - Management of the Shipment Market Monitoring Process
  - Distribution of Shipment Market figures
  - Management of subscriptions
  - o Communication of reports, events/meetings, and other Member benefits
  - Management of Working Group activities
  - Member data analysis
- For user purposes:



- Coordination of responses
- Management and distribution of feedback for specifications and tools
- User data analysis (e.g. how many downloads of a given specification)

## Legal Basis for Collecting and Processing Personal Data

We collect and process personal data based on the following legal points:

- Our legitimate interests in the effective delivery of information and services to you (as listed above)
- For the execution and performance of a contract with Members and Subscribers
- Based on explicit consent between the Trusted Connectivity Alliance and its Members and Subscribers
- For legal compliance and obligations

## **Sharing Personal Data with Third Parties**

Trusted Connectivity Alliance shares personal data collected from membership applications with a very limited set of third parties for informational purposes (e.g. to answer inquiries related to a specific event), marketing and public relations (e.g. announcing when a company joins the Trusted Connectivity Alliance), and to conduct the Trusted Connectivity Alliance's Shipment Market Monitoring Process, in which participation is required as part of membership. Membership information is treated strictly in accordance with Member, Strategic Partner or Subscriber contracts, respectively. All other personal data gathered from the website (i.e. from inquiries) is only used for responding and is not stored or shared with third parties.

## **Geographic Location of Processing Personal Data**

Personal data obtained through our website are collected and processed in the UK; members' personal data may be processed and stored in the UK and the United States. In the event personal data are transferred to any other country outside of the UK or the United States, it will be for a legal purpose or legitimate interest (e.g. to perform a contract) and will be adequately protected in accordance with Chapter V of the GDPR, including as regards data subjects' rights.

#### **Personal Data Automatically Collected**

The Trusted Connectivity Alliance reserves the right to collect some personal data automatically from those users who visit the website, for example, using cookies.

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser that enables the site or service providers systems to recognize your browser and capture and remember certain information. Once you close your internet browser, the cookie simply terminates. Most browsers are initially set to accept cookies. However, if you would prefer, you can set your browser to refuse cookies, although our Website may not perform at optimum levels without cookies.

#### **Data Retention**

Trusted Connectivity Alliance may retain personal data for the length of time deemed necessary to maintain contractual relationships between Trusted Connectivity Alliance and an individual member, for record keeping and archiving information, and other legal requirements.

#### **Safeguards**

Trusted Connectivity Alliance takes its security responsibilities very seriously to ensure the protection of your information on our website. We will take all reasonable precautions to prevent the loss, misuse or alteration of personal data you volunteer. All members' personal data is stored on secure and password protected servers. As well,

TRUSTED CONNECTIVIT ALLIANCE Trusted Connectivity Alliance has implemented technical, physical and administrative safeguards to protect personal data.

## **Individual Rights Regarding Personal Data**

You have the following rights under the GDPR, in certain circumstances and subject to certain exemptions, in relation to your personal data:

- Right to access the data you have the right to request a copy of the personal data that
  we hold about you, together with other information about our processing of that personal
  data.
- **Right to rectification** you have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- **Right to erasure** you have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- Right to restriction of processing or to object to processing you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- Right to data portability you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

If we are processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

We have provided the information below for queries about exercising any of the rights set out above. If you are unhappy with how we process personal data, we ask you to contact the designated contact below so that we can rectify the situation.

#### Changes to our Privacy Policy

This Policy will be the subject of change and the use of information that we gather shall be subject to the Privacy Policy in effect.

#### For More Information

Inquiries regarding this Privacy Policy may be directed to: Mike Strock
General Secretariat
612 Roberson Way
Sandpoint, Idaho 83864, USA
Email: Secretariat@trustedconnectivityalliance.org

