

## **Privacy Policy of the American International Recruitment Council Updated May 11, 2018**

AIRC respects the privacy of its members and other visitors to its website. AIRC is committed to responsible and appropriate use of its website and users. To protect online privacy, AIRC has implemented the following policy.

This Privacy Policy discloses the privacy practices for the American International Recruitment Council (“AIRC”) website located at [www.airc-education.org](http://www.airc-education.org) (the “Site”). In this Privacy Policy, the terms “we,” “us,” or “our” refer to AIRC, and the terms “you” and “your” refer to you as a visitor to the Site. To read the full version of the policy, please download this document: [AIRC Privacy Policy](#).

This Privacy Policy governs our collection of information from you through your use of this Site. It does not apply to any information you may provide to us, or that we may collect, offline and/or through other means (for example, information gathered via mail or telephone). By visiting and using this Site, you agree that your use of this Site, and any disputes over our online privacy practices, will be governed by this Privacy Policy and or Terms of Use. The AMS implementation is responsive, which means the same secure code that is executed on a desktop device is also used on mobile devices.

### **Types of Information AIRC Collects**

The types of information collected on our Site are described below. This information may be collected directly by us, or it may be collected by our third party website hosting provider, or another service provider, on our behalf. No personally identifiable information (such as your name, address, email address, or telephone number) is automatically collected via our Site; personally identifiable information about Site users is collected only when it is knowingly and voluntarily submitted by Site visitors.

### **Information You Voluntarily Provide**

We may collect and store information, personal or otherwise, that you voluntarily supply to us while on our Site. Some examples of this type of information include information that you submit electronically when you contact us with questions or request email updates or RSS feeds, and information you post on public posting areas on our Site (such as the comment feature for news articles and updates). We may also ask for information (including a credit or debit card number) from those who pay for an AIRC membership, pay AIRC Certification fees, pay for event registration or conduct other transactions on our Site.

This category of information also includes information that you electronically submit when you submit an AIRC membership application, or an AIRC Certification application, via our Site. All information voluntarily supplied by you via our Site as part of the AIRC membership application process and/or the AIRC Certification process will be collected and stored by us in accordance with the terms of this Privacy Policy.

While some areas of our Site are available to the public, many of the features and services that are available on the Site are made available only to AIRC members (the “Restricted Access Areas and Member Only”). If you (or your institution, agency or

organization) are not an AIRC member but would like to join, you can request membership by visiting the “Join AIRC” section of the Site and completing the membership application for the category of membership you seek. The AIRC membership form will require you to submit certain personally identifying information, such as billing information and general contact information. As part of the membership application process, you also will be asked to create a username and password for access to the Restricted Access Areas of the Site. When you log in to the Restricted Access Areas, you will have the option of providing additional information to complete your (or your institution’s, agency’s or organization’s) member profile. We may also give you the option of making your member profile visible to other registered AIRC members. The more information you provide, the more valuable your member profile will be to other members who wish to know more about you as an AIRC member.

When you become an AIRC member, we collect information about you including (but not limited to) your name, your employer’s name, your work address (including your country location), and your email address. We may also collect a mobile phone number. Members may edit their profile at any time to change, add, or remove personal information.

We process your personal information for membership administration, to deliver member benefits to you, and to inform you of AIRC-related events, content, and other benefits or opportunities associated with your AIRC membership. AIRC may also use this information to help understand our members’ needs and interests to better tailor our products and services to meet your needs.

### **Live events and web conferences**

AIRC hosts many events throughout the year. These include in-person conferences like the Annual Conference and Summer Workshop, as well as live webinars (collectively “events”). If you register for one of our events and you are a member, we will access the information in your member account to provide you with information and services associated with the event. If you are not a member and you register for one of our events, we will collect your name and contact information, which we will store in our database(s) and use to provide you with information and services associated with the event.

If you are a presenter at one of our events, we will collect information about you including your name, employer and contact information, and photograph, and we may also collect information provided by event attendees who evaluated your performance as a presenter. We may also make and store a recording of your voice and likeness in certain instances.

We keep a record of your participation in AIRC events as an attendee or presenter. This information may be used to provide you with membership and certification services, or to tell you about other events.

In association with attending one or more of our conferences, you will have the option to download an event app to help you navigate the conference and plan your schedule. The event app may require the device identifier associated with your device but does not collect or use any other personal data.

Some of our events are sponsored. AIRC provides an attendee list to sponsors, co-sponsors and exhibitors of our events. AIRC may also allow sponsors, co-sponsors and/or exhibitors to send you material by mail once per sponsored event, in which case AIRC engages a third-party mailing service and does not share your mailing address directly with the sponsor/exhibitor. If you do not wish to have your information included in an attendee list or to receive information from sponsors, co-sponsors and/or exhibitors, you can express your preferences when you register for events or you may contact the AIRC directly [at staff@airc-education.org](mailto:staff@airc-education.org).

### **Your correspondence with AIRC**

If you correspond with us by email, the postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you of AIRC conferences, or other services; or to keep a record of your complaint, request, and the like. If you wish to have AIRC “erase” your personal information or otherwise refrain from communicating with you, please contact us [at staff@airc-education.org](mailto:staff@airc-education.org).

### **Purposes for processing your data**

AIRC processes your data to provide you with the goods or services you have requested or purchased from us, including membership services, events, certification, and training. We use this information to refine our goods and services to better tailor them to your needs and to communicate with you about other services AIRC offers that may assist you in your career or otherwise help you do your job as a recruitment professional.

### **Payment card information**

You may choose to purchase goods or services from AIRC using a credit or debit card. Typically, payment card information is provided directly by users, via the AIRC website, into the PCI/DSS-compliant payment processing service to which AIRC subscribes, and AIRC does not, itself, process or store the card information. Occasionally, members or customers ask AIRC employees to, on their behalf, enter payment card information into the PCI/DSS-compliant payment processing service to which AIRC subscribes. We strongly encourage you not to submit this information by email. When AIRC employees receive payment card information from customers or members by email, fax, phone, or mail, it is entered as instructed and then deleted or destroyed. Accounting data, per GDPR does not fall into the “deleted” data scope as it is legally required for tax purposes.

### **Information That Is Automatically Collected**

We also may collect and store non-personally identifiable information that is generated automatically as you navigate through our Site. For example, our Site’s servers may

automatically collect limited information about your computer's connection to the Internet, including your computer's IP address. The IP address is a number that lets computers attached to the Internet know where to send data - such as the web pages users view. Your IP address does not tell us who you are. We use this information to deliver the Site's content to you upon request and to measure traffic within the Site. Our Site's servers also may log information such as the type of web browser software you use to access the Site, the operating system running on your computer, and the speed of your computer's CPU, for purposes of measuring traffic patterns on the Site and the usage of Site services and features and optimizing the Site to accommodate our users. This information is not correlated with any personally identifying information you may provide.

We may at times also use a standard feature found in browser software called a "cookie" to enhance your experience with the Site. Cookies are small files that your web browser places on your hard drive for record-keeping purposes. By showing how and when visitors and members use the Site, cookies help us identify how many unique users visit us and track user interests, trends and patterns. They also prevent you from having to re-enter your preferences on certain areas of the site where you may have entered preference information before. For example, if you are an AIRC member, and you select the "Remember Me" option when you log in to the Member Areas, we can use cookies to recognize you so you won't need to reenter your username and password the next time you visit the Site). Of course, you are free to set your web browser not to accept cookies.

### **How AIRC Uses Collected Information**

We may use the information that we collect from you in a variety of ways, including, but not limited to, for purposes of processing your membership request or application for AIRC Certification, offering you more personalized features, providing you with communications and services you have requested, sending you RSS feeds and email notifications you have requested, notifying you of important changes or additions to our Site, our Site policies, or the features and services offered via our Site, sending you email updates, administrative notices and other communications that we believe may be of interest to you, delivering our Site content to you, measuring Site traffic and improving the Site and the services and features offered via the Site. By using our Site, you agree that we may use any information submitted by or collected from you via the Site for any of the foregoing purposes, and for any other purpose related to the Site and the AIRC membership and Certification processes.

We also may provide your information, personal or otherwise, to our third-party service providers, agents, contractors and External Reviewers for purposes related to Site administration and operation and to the processing and/or evaluation of AIRC membership and Certification applications. For example, if you submit an application for AIRC Certification, the information you submit will be shared with one of our External Reviewers who will evaluate your application and report to AIRC the results of the evaluation. Our third-party service providers, agents, contractors and External Reviewers have agreed not to share your information with others or to use it for purposes other than those for which we provide it to them.

We do not sell or rent any personal information about our members or Site visitors to telemarketers, mailing list brokers, or any other companies.

Please be aware that we may occasionally release information about our Site visitors and registered members if required to so by law or if, in our business judgment, such disclosure is reasonably necessary; (a) to comply with legal process; (b) to enforce our Terms of Use; or (c) to protect the rights, property, or personal safety of our Site, us, our Site visitors and/or AIRC members.

Please also keep in mind that whenever you voluntarily make your personal information or other private information available for viewing by other Site visitors, AIRC members or third parties online – for example, by using the “Post a Comment” tool that is available in certain areas of our Site – that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third party use of such information.

### **Member Directory**

AIRC makes member information available through the AIRC Online Member Directory to other AIRC members using this Site. Members are invited to opt-in to having their information shared in the Member Directory.

### **International Use**

When you use the Site or submit your information (including personal data) to us via the Site, you expressly consent to AIRC’s collection, disclosure and transfer of your information (including personal data) for the purposes identified in the section of the policy entitled “How AIRC Uses Collected Information.” If you reside outside the United States, please be aware that (i) AIRC’s databases are stored on servers and storage devices located in the United States, (ii) your information (including personal data) may be transferred to the United States for processing and storage, and (iii) the United States, and the localities within the United States where AIRC’s databases are located, may not guarantee the same level of protection for personal data as the locality or country in which you reside. By using our Site, you consent to the transfer of such information outside of your country.

### **Transferring personal data from the EU to the US**

AIRC has its headquarters in the United States. Information we collect from you will be processed in the United States. AIRC collects and transfers to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of the AIRC in a manner that does not outweigh your rights and freedoms. AIRC endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with the AIRC and the practices described in this Privacy Notice. AIRC also minimizes the risk to your rights and freedoms by not collecting or storing sensitive information about you.

### **Data subject rights**

The European Union’s General Data Protection Regulation and other countries’ privacy laws provide certain rights for data subjects. This Privacy Notice is intended to provide you with information about what personal data AIRC collects about you and how it is used. If you have any questions, please contact us at [Staff@airc-education.org](mailto:Staff@airc-education.org).

If you wish to confirm that AIRC is processing your personal data, or to have access to the personal data AIRC may have about you, please contact us at [Staff@airc-education.org](mailto:Staff@airc-education.org).

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside AIRC might have received the data from AIRC; what the source of the information was (if you didn't provide it directly to the AIRC); and how long it will be stored. You have a right to correct the record of your personal data maintained by AIRC if it is inaccurate. You may request that AIRC erase that data or cease processing it, subject to certain exceptions. You may also request that AIRC cease using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how AIRC processes your personal data.

Reasonable access to your personal data will be provided at no cost to AIRC members, conference attendees and others upon request made to AIRC at [Staff@airc-education.org](mailto:Staff@airc-education.org). If access cannot be provided within a reasonable time frame, AIRC will provide you with a date when the information will be provided. If for some reason access is denied, AIRC will provide an explanation as to why access has been denied.

### **Security of your information**

To help protect the privacy of data and personally identifiable information you transmit through use of this Site, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

### **Data storage and retention**

Your personal data is stored by AIRC on its website provider's servers, and on the servers of the cloud-based database management services AIRC engages, located in the United States. AIRC retains data for the duration of the customer's or member's business relationship with AIRC. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information to comply with our legal obligations, resolve disputes and enforce our agreements. Accounting data, per GDPR does not fall into the "deleted" data scope as it is legally required for tax purposes. The entire AMS site is secure using SSL. The data is stored at Tierpoint, a U.S. based SSAE 16 SOC audited facility on the East Coast that is manned 24 hours a day, 7 days a week, 365 days a year.

For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact AIRC data protection officer at [Staff@airc-education.org](mailto:Staff@airc-education.org).

### **Changes and updates to the Privacy Notice**

By using this Site, you agree to the terms and conditions contained in this Privacy Notice and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use this Site or any AIRC benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Notice and Conditions of Use, or any other agreement we have with you, will be governed by the laws of the District of Columbia. You also agree to arbitrate such disputes in the District of Columbia, and to abide by any limitation on damages contained in any agreement we may have with you.

As our organization, membership and benefits change from time to time, this Privacy Notice and Conditions of Use is expected to change as well. We reserve the right to amend the Privacy Notice and Conditions of Use at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice and Conditions of Use at this Site. We may e-mail periodic reminders of our notices and terms and conditions and will e-mail AIRC members of material changes thereto, but you should check our Site frequently to see the current Privacy Notice and Conditions of Use that is in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this Site.