

Sohn Foundation London

Privacy and Cookies Policy

The Sohn Foundation London (company number: 08075575, charity number: 1148454) is a wholly owned subsidiary of The Ira Sohn Conference Foundation, Inc. (“Sohn London” or “our” or “we” or “us”) which collects data about individuals.

We take your right to privacy very seriously and respect any personal information you share with us and endeavour to keep it safe. This privacy policy is intended to give you an understanding of how and why we use the information you give us via our website (“the Site”), or otherwise.

By using our website or providing us with any personal information, you agree to your personal information being used and stored in the manner set out in this policy.

We may update this policy from time to time without notice to you, so please check it regularly.

CONTENTS

1.	Collection of your Personal Data	1
2.	Use of Personal Data Collected.....	2
3.	Our legal basis for processing data.....	3
4.	Who has access to your information	4
5.	Security Measures	4
6.	Collection of Personal Data from Children	4
7.	Right to update your preferences	4
8.	Data retention.....	5
9.	Your privacy rights	5
10.	Complaints.....	6
11.	Links to Other Sites	6
12.	Cookies	6
13.	Updates to Privacy Policy	7
14.	Contact Information.....	7

1. Collection of your Personal Data

1.1 We collect personal data about you for a number of reasons, including communicating with you, responding to requests for information, and to process donations.

1.2 The personal data we collect can include:

- (a) Your full name;
- (b) Postal address;
- (c) Telephone number;
- (d) E-mail address;

- (e) Bank details;
 - (f) Information provided via online forms, registration forms, surveys, etc.
 - (g) Debit and credit card information when purchasing tickets to an event or making a donation;
 - (h) Records of your correspondence with us, if you have contacted us;
 - (i) Your connection to the charity;
 - (j) Donation and gift aid details; and
 - (k) Details of your visit to the Site including aggregate and user-specific information on which pages users access.
- 1.2 We also collect information about the use of our website using cookies (see the cookies policy for more information).

2. **Use of Personal Data Collected**

- 2.1 Sohn London may use the data collected about you to:
- (a) Process a donation;
 - (b) Acknowledge donations and send a thank you letter;
 - (c) Deliver services, literature and/or other materials and information you have requested from us;
 - (d) Administer events, including our annual conference;
 - (e) Administer the Sohn London Investment Competition;
 - (f) Send marketing and promotional communications about fundraising opportunities, events and other products or services;
 - (g) To communicate with you and/or respond to any queries or correspondence from you;
 - (h) For our own internal administrative purposes and keep a record of your relationship with us;
 - (i) To manage your communication preferences;
 - (j) To conduct surveys, research and gather feedback;
 - (k) Conduct research, obtain feedback and conduct statistical analysis; and
 - (l) To comply with applicable laws and regulations, and requests from statutory agencies.

- 2.2 We also use IP addresses to help us analyse trends, administer the site, track users' movement, and gather broad demographic information for aggregate use.
- 2.3 Unless you specify that a gift be "anonymous" or otherwise request that your name not be listed when making a donation to us, we list the names of donors who give \$1,000 and up in some brochures and benefit programs, so as to recognise their generosity publicly.
- 2.4 Note that if you have attended a previous Sohn Conference or event we will contact you by e-mail to let you know about the same or similar events in the future (unless of course you tell us you would prefer not to hear from us). We will only send additional marketing or fundraising appeals to you by e-mail with your consent.
3. Our legal basis for processing data
- 3.1 As we collect and use personal data, we must have a lawful basis for so under data protection law. The General Data Protection Regulation ("GDPR") sets out six ways in which personal data can be legitimately used. The GDPR requires us to tell you the legal basis which we rely on when processing your data. These include:
- (a) you providing us with consent to use your data for a particular purpose (such as collecting your credit card details to complete a donation or an email address to send you a confirmation email regarding a donation);
 - (b) using your data when it is in our "legitimate interests", which are set and explained below;
 - (c) using your data to complete a contract that you have entered into with us (this can include providing you with event tickets that you have purchased from us); and
 - (d) to process data where we are under a legal obligation to do so (such as processing your gift aid declaration).
- 3.2 Personal data may be legally collected, processed and used if it is necessary for a legitimate interest of our organisation to use your data, as long as it is fair and does not adversely impact on your rights. When using your personal data and information, we will always consider if it is fair and balance to do so and if it is within your reasonable expectations. We will ensure we balance your rights and our legitimate interests to ensure we use your personal data in ways that are not unduly unfair or intrusive. Our legitimate interests include:
- (a) Administration and operational management: to manage and administer our events, to provide information that you have requested,
 - (b) Fundraising and Sponsorship: to administer donations and sponsorship monies to send correspondence related to donations, and to send you information about our work and fundraising appeals.
 - (c) Charity governance: to pursue and delivery our charitable purposes, statutory and financial reporting and other regulatory compliance purposes and intergroup transfers of data between (but not limited to) Sohn London and Sohn Conference Foundation and investigating, preventing or taking action in relation to any illegal activities which violate our policies or are required by law.

3.3 If you want to have more information about our use of legitimate interests or to change our use of your personal data in this manner, please get in touch with us using the contact details set out in Section 14 below.

3.4 We will retain your data for no longer than is necessary for the purposes it was collected in accordance with our data retention policy.

4. Who has access to your information

4.1 Personal data is shared with our parent charity, The Ira Sohn Conference Foundation, Inc, based in the US, so that we can administer Conferences and donations across the international group of charities.

4.2 Unless otherwise agreed, Sohn London will not sell or disclose to other third parties any personal data you provide to us, except to the extent necessary to comply with applicable laws or valid legal processes, to protect the rights and intellectual property of Sohn London, or in urgent circumstances to protect Sohn London or the personal safety of any individual. We may also merge or partner with other organisations and in so doing, acquire or transfer information. Your personal information may be among the transferred assets.

4.3 We may allow our staff, consultants or other external providers acting on our behalf to access and use your information for the purposes for which you have provided it to us (such as delivering communications, analysing data and processing credit card payments). We will only provide those companies with the information they need to deliver the relevant service, and for no other purpose.

4.4 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). For example, when transferring it to the Ira Sohn Conference Foundation in the US. Where we do send your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information, for example, entering into EU approved model contract clauses for international transfers.

5. Security Measures

5.1 Sohn London has established reasonable precautions to protect collected personal information from loss, misuse, unauthorised access, disclosure, alteration or destruction, which include technical, contractual, administrative and physical steps. Please note that unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or via e-mail; any transmission is at your own risk.

6. Collection of Personal Data from Children

6.1 Sohn London does not knowingly solicit information from children and it does not knowingly market the Site or its products or services to children. To the extent that Sohn London is able to determine the age of users by their submissions to, or communications with, the Site, Sohn London will not knowingly collect or process information from individuals under thirteen years of age without their parent's or guardian's consent.

7. Right to update your preferences

7.1 You may at any time opt-out of receiving direct marketing communications from Sohn London by contacting us using the details set out in section 14 below. Sohn London will not share your personally identifiable information with an unrelated third-party without giving you the opportunity to consent to this.

7.2 If you make any changes to your communication preferences, we will update your records as soon as possible. It may take up to a month for our systems to update and stop any postal communications from being sent to you.

8. **Data retention**

8.1 We keep personal data for as long as there is a need to keep it in connection with the purposes for which it was collected and in accordance with our Data Retention Policy. The length of time may depend on the reason for which we are processing the data and the type of data being processed, however in most cases we retain data for 7 years in order to comply with financial and HMRC reporting requirements. We will carefully and securely dispose of any data after the retention period has expired.

8.2 In the event that you ask us to stop sending you marketing communications, we will retain certain details, such as your name, to help us ensure that you are not contacted again.

9. **Your privacy rights**

9.1.1 You have a number of rights under data protection legislation. These include:

(a) **Right of access**

You have the right know what information we hold about you and to ask, in writing, to see your records. We will provide you with details of the records we hold as soon as possible and at latest within one month, unless the request is complex. We may require proof of identity before we are able to release the data. Please use the details in the "Contact us" section below if you would like to exercise this right.

(b) **Right to be informed**

You have the right to be informed how your personal data will be used. This policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

(c) **Right to withdraw consent**

Where we process your data on the basis of your consent (for example, to send you marketing texts or e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the "Contact us" section below.

(d) **Right to object**

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by

post). To do this, or to discuss this right further with us, please contact us using the details in the “Contact us” section below.

(e) Right to restrict processing

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

(g) Right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us using the details in the “Contact us” section below.

(h) Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

10. **Complaints**

10.1 If you have any comments, concerns or complaints about the way we have used your personal data, please do not hesitate to contact us using the details in section 12 below. You are also entitled to make a complaint to the Information Commissioner’s Office.

11. **Links to Other Sites**

11.1 Sohn London does not endorse, and is not responsible for, the privacy practices or the content of other websites that may be linked to the Site, including product information. You should review these policies in connection with your use of such third-party sites.

12. **Cookies**

12.1 To enhance the Internet experience, Sohn London may also use Internet technologies such as “cookies” and “JavaScript.” Sohn London may identify users through these technologies solely to customize and enhance the Internet experience of the individual users. For example, Internet cookies save data about individual users, such as the user’s name, password, user-name, screen preferences, the pages of a site viewed by the user, and the advertisements viewed or clicked by the user. When the user revisits the Site, Sohn London may recognize the visitor by the Internet cookie and customise the user’s experience accordingly. Users may decline Internet cookies, if any, by using the appropriate feature of their Web client software, if available. If cookies are disabled, however, all features of our Site may not operate as intended. We believe these technologies add value to the user experience, and the

information resulting from these technologies is not sold or otherwise made available to third parties, unless otherwise agreed. This information may include which URL you just came from, which URL you next go to, what browser you are using, what features you click on and read (in whole or in part), and your IP address. We use such data only in the aggregate. This collective data helps us to determine how much our visitors use parts of the website, and to do internal research on our users' demographics, interests, and behavior, so as to better understand and serve you.

13. Updates to Privacy Policy

13.1 The practices outlined above represent our current website guidelines and demonstrate the Sohn London's ongoing application to ensure compliance with the GDPR and data protection practices. To keep up with the rapidly evolving Internet environment, Sohn London will from time to time review and revise these practices without notice. You should review the Privacy Policy periodically to ensure familiarity with its then-current terms and conditions. Your continued use of the Site shall constitute your acceptance of such changes. This privacy policy was last updated in May 2018.

14. Contact Information

14.1 Questions or concerns regarding Sohn London's data protections practices should be addressed to:

Sohn Foundation London

E-mail: info@sohnconference.org

Write to us at:

**10 Queen Street Place
London EC4R 1BE
United Kingdom**