This Policy covers the following:

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This Policy applies to all of the personal data we collect about you, including information collected at events and information collected on www.alcus.org and any other websites (including mobile access) where this policy is linked to; all of which are referred to as the “Site” in this policy.

The Association of Language Companies recognizes the importance of protecting our users’ privacy. To that end we have created our privacy statement and spam policy in order to demonstrate our commitment to privacy. Information on how Site content can and cannot be used is also listed below. Please note that spam laws and regulations above and beyond The Association of Language Companies’ policies may apply to commercial electronic messages sent to individuals who have elected to list their contact information on the Site.

We may occasionally amend this Policy. Any new policy will automatically be effective when it is published on the Site. You should therefore return here regularly to view our most up to date Policy. You should also print a copy for your records.

Who we are

You can find details of all of our group entities below:
What Information do we collect?

Most of the information we collect is information provided directly by you. This may include:

- **Contact information** – information such as name, job title, company name, department, email address, physical mailing address and telephone number;
- **Professional information** – such as your employment background, job description and related information;
- **Transaction information** – your contact information, the services you are interested in, your purchasing requirements, your financial information including credit card or other payment information;
- **Responses to surveys** – information you provide in responding to a survey on the Site, via an app or email, on the telephone or otherwise; and,
- **Include any other information collected.**

We may also collect, and process information obtained through the Site or the device you are using, including:

- **Member information** (including username and password);
- **Location information** (including GPS signals sent by a mobile device, location information gathered from social media networks or sensor or IP address data from your device);
- **information from cookies, web beacons or from the internet**, including your IP address, browser type, operating system, domain name, access times, which pages you visit within our Site and referring website addresses – for more on this please see the next section below on how we use your information;
- **If you ask us to connect with other sites** (for example if you ask us to connect with your Facebook account) we may get information that way too; and,
- **We may record any telephone calls for quality assurance and training purposes.**
We may use publicly accessible information to verify information we are provided with and to manage and expand our organization.

Throughout the website there may be forms to request information and purchase or obtain products and/or services. These forms typically ask for contact information, financial information, and demographic information. Information from these forms is used to deliver the information, products and/or services that you request. It may also be used to notify you of future Association of Language Companies products, services and/or opportunities that may be of interest to you. When completing these forms, please do not supply another person’s personal data to us unless we prompt you to do so and you have received that individual’s consent to do so.

**How do we use your information?**

We use information collected about you as outlined in this Policy.

**General**

Our primary purpose in collecting your personal data is to provide you with the services you requested and those which we believe will optimize your use of the Site. We may use your personal data for the following purposes:

- To provide the information, services or support you request and related after-sales services;
- To identify you, and to contact you from time to time with service updates;
- To send other messages that are useful to the service we provide, including messages regarding our awards programs as well as messages from and regarding The International Coach Federation Foundation;
- To manage our relationship with you and to carry out any related administration;
- To provide personalized, targeted, or location-based content, services, and advertising from us and third parties;
- To promote services, or the services of our suppliers, including by email and via social media platforms (subject to the relevant marketing permissions);
- To compare information for accuracy, and verify it with third parties*;
- To detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Policy or any other purpose referenced herein or therein*;
- To carry out research, including market research, statistical research on site traffic, sales and other commercial information to assist us in improving the services we provide to you and tailor the Site*;
- To keep track of the areas of our Site you visit, the amount of time you spend and the date and time you access our Site to enable us to tailor it to better match your interests and/or preferences.
In more legal terms, we process your personal data where we have your consent to do so, which you may withdraw at any time, or otherwise where this is necessary for:

- The performance of our contract with you for the provision of our services or to take preliminary steps at your request;
- Us to fulfil our legal obligations; or,
- The purposes of the legitimate interests pursued by us or by a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. Our legitimate interests are those indicated with a “*” above, and we consider that we have implemented sufficient checks and protections to ensure that your rights and interests are not unreasonably intruded on.

*However, you can object to processing on any of these bases at any time and, if you do so, we will stop processing the personal data unless we can show compelling legitimate grounds which override your rights and interests, or we need the data to establish, exercise or defend legal claims – see “Your rights” below.

Cookies

Cookies are small pieces of information that are stored by your browser on your computer’s hard drive. Our Site uses “cookies” to help you access our Site. Also, our Site’s cookies help speed up navigation, keep track of items and help to provide you with custom-tailored content. In addition, we also use cookies to remember information that you gave us so you do not have to re-enter it each time you visit our Site. We use four types of cookies, which we describe in this section.

- **Essential**: cookies that are essential to provide you with services you have requested. For example, these include the cookies that make it possible for you to stay logged into your membership account. If you set your browser to block these cookies, then these functions and services will not work for you. In particular, we won’t be able to save your preferences about cookies.

- **Performance**: cookies which measure how often you visit our sites and how you use them. We use this information to get a better sense of how our users engage with our site, so that users have a better experience. For example, we collect information about which of our pages are most frequently visited, and by which types of users. We also use third-party cookies to help with performance. For example, the Google Analytics cookie gives us information such as your journey between pages and whether you have downloaded anything.

- **Functionality**: cookies that are used to recognize you and remember your preferences or settings when you return to our site, so that we can provide you with a more personalized experience.

- **Advertising**: cookies that are used to collect information about your visit to our site, the content you have viewed, the links you have followed and information about your browser, device and your IP address. We have set out more details on this below.
These various technologies are used in analyzing trends, administering the Site, tracking users’ movements around the Site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies on an individual as well as aggregated basis. As is true of most websites, we gather some information automatically and store it in log files. This information includes IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data.

Cookie consent

In most cases we will need your consent in order to use cookies on the Site. Exceptions to this apply such as where the cookie is essential in order for us to provide you with a service you have requested (e.g. to enable you to put items in your shopping basket and use our check-out process. If you visit our Site when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely. If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this Site. For further information about cookies and how to disable them please go for example to the UK Information Commissioner's webpage on cookies: https://ico.org.uk/for-the-public/online/cookies/. We do not knowingly collect or process data from anyone under the age of thirteen (13) years old.

Who may use your information?

We are committed to keeping your e-mail address confidential. We do not sell, rent or lease our subscription lists to third parties. We may disclose your personal data to enforce our policies, to comply with our legal obligations or in the interests of security, public interest or law enforcement in any country where we have entities or affiliates. For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.

We share your information with third parties who help deliver our services to you. Examples include hosting our web servers, analyzing data, providing marketing assistance, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that data for any other purpose.

You may have accessed our Site through a hyperlink from the website of one of our subsidiaries or trading partners If so, you consent to your personal details and purchase information, including behavioral patterns, being shared with that trading partner in accordance with our contractual relationship with them.

If we or any part of our group is sold, or some of its assets transferred to a third party, your personal information, as a valuable asset, may also be transferred to the acquirer, even if they are not in the same line of business as us. Our member database could be sold separately from the rest of the organization, in whole or in a number of parts. Potential purchasers and their advisors may have limited access to data as part of the
sale process. However, use of your personal information will remain subject to this Policy. Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration.

Please remember that when you share information publicly on the Site, for example a comment on a blog post, it may be indexable by search engines, including Google, which may mean that the information is made public.

**Third party links and services**

The Site may use and contain links to third parties’ websites. We are not responsible for the privacy practices or the content of those websites or services. Therefore, please read carefully any privacy policies on those links or websites before either agreeing to their terms or using those websites. If you have asked us to share data with third party sites (such as social media sites), their servers may not be secure. Note that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result, others may nevertheless unlawfully intercept or access private transmissions or data.

**How Do We Protect Your Information?**

We take what we consider to be appropriate technical and organizational measures to guard against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect our user database and access to this database is restricted internally. However, it remains your responsibility:

- Where you have a member’s account for the Site:
  - To log off or exit from Site when not using it;
  - To ensure no-one else uses the Site while your device is logged on to the Site (including by logging on to your device through a mobile, Wi-Fi or shared access connection you are using);
  - To keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network. You should use a password which is unique to your use of the Site – do not use the same password as you use for another site or email account; and,

- To maintain good internet security. For example, if your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you
can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected.

**Where is your information processed?**

When you signed up for a member’s account at this Site you agreed that we may transfer your personal data to countries outside the European Economic Area. We will put in place appropriate security measures to safeguard your personal data where any such transfer is made. If we transfer your personal data outside your country, we will take steps to ensure that your privacy rights continue to be protected in compliance with applicable data protection law and this Policy.

**Marketing communications**

If you have given permission, we may contact you by about any of the following:

- Member updates (only for registered members);
- Membership renewal reminders (only for registered members);
- Invitations to webinars and teleconferences designed to enhance your membership experience (only for registered members);
- Invitations to participate in our initiated and/or supported research;
- Information about our industry research; and/or,
- Events
- Partner Updates

In compliance with the CAN-SPAM Act, GDPR, and CASL all email sent from our organization will clearly state who the email is from and provide clear information on how to contact the sender. In addition, all email messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further email communication from us.

We are committed to keeping your information confidential. We do not sell, rent or lease our subscription lists to third parties, and we will not provide your personal information to any third-party individual, government agency or company at any time unless compelled to do so by law. We will use your email address solely to provide timely information about The Association of Language Companies and its programs and services. The Association of Language Companies will maintain the information you send via email in accordance with applicable international law.

You should have a prior relationship with the person receiving your email. If you prefer not to receive any direct marketing communications from us and/or our partners, you can opt out at any time by emailing us at info@alcus.org or calling us at (856) 494-6866. See further 'Your rights', below.
How long do we keep your information?

We will retain your personal data only as long as is necessary for the purposes set out in this Policy, or as is required by applicable law, and then we will delete it.

Change in Terms of Privacy

The Association of Language Companies reserves the right to alter its privacy policies. Any changes to the policy will be posted on this page.

This site is controlled and operated by The Association of Language Companies from its offices within the United States. The Association of Language Companies makes no representations that materials, information, or content available on or through this site are appropriate or available for use in other locations, and access to them from territories where such materials, information, or content are illegal is prohibited. Those who choose to access this site from other locations do so on their own volition and are responsible for compliance with applicable local laws.

Site Content

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All materials on this site (as well as the organization and layout of the site) are owned and copyrighted by the Association of Language Companies. All rights reserved. No reproduction, distribution, or transmission of the copyrighted materials at this site is permitted without the written permission of The Association of Language Companies.

Your rights

As explained above, you have the right to opt-out of receiving marketing communications from us. In addition, to the extent permitted by the laws of your country, you may have the right to object to the processing of your personal data for direct marketing purposes. If your objection is not to direct marketing in general, but to direct marketing by a particular channel e.g. email or telephone, please specify the channel you are objecting to.

Further, to the extent permitted by the laws of your country, you may also have the right to access, correct, delete, restrict, be forgotten, or object to processing of, or request data portability of the personal data collected about you subject to some conditions and exceptions. You can find out more about these rights in the EU by reading the General Data Protection Regulation here: http://www.eugdpr.org/the-regulation.html. In the EU you also have the right to lodge a complaint with a data protection regulator there.

If you wish to inquire about any of those rights or would like to submit a request then please send us your request by any of the following ways:
You may contact our headquarters by emailing your request to info@alcus.org; or,

You can call us at (856) 494-6866.

**How do you contact us?**

If you have any questions about this Policy, the practices of this Site, or your dealings with this Site, we encourage you to contact us using the following details:

- Emailing your request to info@alcus.org; or,
- You can call us at (856) 494-6866.