



Association of Insurance Compliance Professionals®

Privacy Policy

Approved by Board September 22, 2018

The Association of Insurance Compliance Professionals, Inc. (“AICP”, “we”, “us”) respects the privacy of its members, the visitors to its website, and others. AICP has created this Privacy Policy to demonstrate its firm commitment to privacy and security.

This Privacy Policy describes how AICP collects information from its members (“member”) from users of the website (“user”), and from individuals who communicate with AICP, attend its events or contact AICP for information (“visitor”). The document describes how the collected information is used, and rights related to the collection and use of such information. For the purpose of this document “you” means any member, user or visitor.

Please read the policy carefully and note that by using AICP’s website, or interacting with us in any manner, you signify your agreement to this Privacy Policy (to the extent permitted by applicable law). AICP will update this policy from time to time. Any revisions, amendments, or modifications will be posted on the website in accordance with applicable law.

What information does AICP collect and how is personally identifiable information used once it is collected?

Anonymous information refers to data that cannot be tied back to a specific individual. AICP does not collect any personally identifiable information from users browsing its public website. Only aggregate data—such as the number of hits per page, browsers, and Website types—is collected. Aggregate data is only used for internal and business purposes and does not include any personally identifiable information.

Personally identifiable information refers to data that tells AICP specifically who the user is. To gain access to members-only resources and personalization features on the AICP website, members are asked to provide some limited information. This data is submitted voluntarily. AICP asks users to provide their name and password for login purposes and to verify contact information for event registration.

Log Data

When a user uses, or interacts with our Website, or clicks on a link that directs the user to our Website, the user’s browser automatically provides, and we automatically collect and store, certain information about the user’s device (computer, tablet, smartphone) and the user’s activities. This includes:

- Preferences and settings: time zone, language, and character size;
- Identifiers: IP address
- Technical information: type of device, operating system name and version, device manufacturer, browser information (type, version), screen resolution;

- Coarse Geographic information: geographic location derived from the IP address.

We collect this data for the proper operation of our Website. Until the user registers with us, this data cannot be linked to a specific individual.

Traffic Data

Data generated by the use of the Website also includes: (for European Economic Area users, if the user has accepted profiling cookie)

- Information about use of the Website such as: date stamp, URL of the visited page, URL of the last webpage visited before visiting our Website or a website using our Website. URL of the last webpage visited before visiting our website;
- History of interaction with our webpages such as: pages viewed, time spent on a page, click through, clickstream data; queries made, search history, search results selected; comments made, type of service requested, purchases made.

The database storing AICP membership contact information is a record that is held in the members only section of the Website. Its use for commercial or solicitation purposes is denied to all, except as specifically permitted for AICP events, sponsors and exhibitors. Non-members will be denied requests for lists of members, except as specifically permitted for AICP events, sponsors and exhibitors.

Payment Information

If a visitor or member signs up for an event, program, conference, or requests some other service for which payment is required, the visitor or member is asked to provide payment information. This information is collected and processed by an external payment processor; we do not have access to it.

Registered Visitor or Member Information

If a visitor registers on the website to request information, or to become a member, a record is created in the name of that registered visitor or member. Depending on the situations, we may request preferred contact and other information as follows:

- First and Last Name
- Employer Information
- Email address
- Address, including country
- Telephone number
- Title
- Product line
- Age range

Only the minimum amount of information necessary to operate or manage the account and for legitimate AICP purposes is mandatory. To access the user account, the registrant is requested to choose a username

and password. Some of this information will be posted in the member directory on the AICP website and in printed materials and may be made available to AICP sponsors and exhibitors.

Communication from Visitors or Members

When a visitor or member completes an online form, visits our website, or otherwise contacts us by email, phone, or text, we automatically collect and store certain information about that individual and his/her activities, as we receive from such individual, for example:

- Name and contact information;
- Employer information, if any;
- The nature of the communication;
- The purpose of the interaction, and the action we took in response to the inquiry or request;
- Any action the individual takes upon receipt of such communication (for example, whether the individual registers to attend an event that we offer, becomes a member, or requests to receive documentation).

The information collected in connection with each type of interaction is retained so that we can continue interaction with the requestor and for legitimate AICP purposes.

Communications to Visitors or Members

Unless we are prohibited by applicable law from using certain categories of cookies and a user has not otherwise consented to our use of such cookies, we insert a tag or GIF in some of our correspondence. In that case, our message contains images or links that when viewed or clicked, allows us to know whether the user has accessed or declined to open our message. This action may also allow us to count unique clicks or visits and potentially track the recipient.

This information helps us understand how the individual reacts to our communications and limit the amount and nature of information provided.

Purposes of processing

We use personally identifiable information for the following purposes:

Service

- To allow members to create and maintain a member account, verify a member's identity and assist a member if he/she misplaces or forgets his/her login or password;
- To respond to visitors or members' inquiries, allow them to sign up for communications, request information and documents, to contribute to or download AICP content;
- To finalize purchase orders and deliver a service;
- To carry out market research and surveys;
- For interaction on social media

Marketing

- For marketing purposes via e-mail, text, instant messaging, applications, regarding AICP's products and services, or those of selected third parties, such as sponsors and exhibitors;

Marketing to Existing Members

- To interact with existing members by sending marketing communications regarding products and services that are identical or similar to those the member or visitor has previously purchased or requested via the AICP

Profiling

- To create a profile of a person as an AICP user, through the use of profiling cookies and by collecting and analyzing information on the user's interest in order to serve information and advertisements that may be relevant to that user. All algorithms involved in this processing are regularly tested, to ensure the processing's fairness and control for bias;

Analytics

- For development and administration of the AICP, to improve AICP's offerings and troubleshoot any technical issues which may arise in connection with the use of the AICP Website and services.

Misuse or Fraud

- To prevent and detect any misuse of the AICP, or any fraudulent activities carried out through the AICP.

Categories of Recipients

We believe that our practices below are fair, lawful, and proportional in light of the legitimate interests and needs of our organization, our legal obligations, and our obligations under our contracts; that they fairly address each individual's legitimate rights and expectations in view of the context and purpose of the collection and use of the information collected; and are not intrusive or contrary to individuals' rights.

We share personally identifiable information with the following entities:

Disclosure to Marketing Partners

In countries where such activities do not require prior explicit consent, we may provide personally identifiable information of individuals to sponsors and exhibitors. These partner firms use this information to provide individuals with information on products and services that may be of interest.

In countries, such as in the European Economic Area, where such activities are restricted, we conduct these activities in accordance with applicable local laws.

Service Providers

We share information with our suppliers, subcontractors, and other third parties who provide services to us (collectively “service providers”) in connection with management, our Website, payments and financial transactions, our events, hosting, data analytics, information technology and infrastructure, order fulfillment, email delivery, auditing, and other related activities as necessary to perform the services that the Member purchased and to comply with our legal or contractual obligations. We provide only the information such service providers need to perform their designated functions. For the terms and conditions, and security of third party websites to which you might link from our website, we have no responsibility or obligation with respect to such third-party websites. You should review the third-party website’s terms and conditions and security provisions and policies.

Events and Tradeshows

If, in connection with an event or a tradeshow, an individual provides us with contact information, we assume that this constitutes an affirmative explicit consent to our collection and use of this information for marketing purposes, and your authorization to provide this information to AICP sponsors and exhibitors.

Some of the events or tradeshows in which we participate may be organized and hosted by hotels, restaurants, venues, and other unaffiliated organizations. These entities may require attendees to these events to provide information such as their name, email address, and/or phone number as part of the registration process. We cannot control this collection or use of information. We encourage you to read the privacy statements of any third parties to whom you provide information, as they control how such information is handled.

Fraud Prevention and Protection of Legal Rights

We may use and disclose information to the appropriate legal, judicial or law enforcement authorities and our advisors and investigators (i) when we believe, in our sole discretion, that such disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of AICP, its members, or others; (ii) when an individual has abused AICP services, exceeded the permitted use of the service, gained unauthorized access to any computer network or system, any application, engaged in spamming, denial of service attacks, use of malicious code, or similar attacks; (iii) to exercise or protect legal rights or defend against legal claims; or (iv) to allow us to pursue available remedies or limit the damages that we may sustain.

Law Enforcement

We may have to disclose personally identifiable information if a court, law enforcement or other public or government authority with appropriate jurisdiction so requests, and we believe, in our reasonable discretion, that such request was made in compliance with applicable law.

Corporate Reorganization

We may transfer personally identifiable information to a third party in case of the reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, including in the event of bankruptcy or corporate restructuring. Except as otherwise provided by a bankruptcy or other court, the use and disclosure of all transferred personally identifiable information will be subject to policies that are consistent with the policies described in this Privacy Notice. Any information that any individual submits or that is collected after that transfer may be subject to a new privacy policy adopted by the successor entity.

What are "cookies" and how does AICP use them?

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of a user's computer, often used to provide you with a customized experience. This unique number identifies the user's web browser but not the user. A cookie will not provide personally identifiable information about users, such as their name and address.

The use of cookies is now an industry standard and cookies are currently used on most major websites. If users prefer, they can reset their browser to notify them when they have received a cookie. They can also set their browser to refuse to accept cookies altogether.

AICP uses cookies. At no time is any personal information stored within any AICP created or provided cookie. Most web browsers automatically accept cookies, but it is possible to change your browser setup so that it does not accept cookies. Accepting cookies through your browser is a personal choice. You can still enjoy the AICP website if you choose not to accept cookies.

What privacy issues arise with links to other sites and who collects information and has access to it?

Data collected through AICP's website is collected and maintained solely by AICP.

This website contains links to other websites. AICP has no control over, and is not responsible for, the privacy policies or content of such sites.

How can members modify their AICP member information?

Members may change their information by sending an e-mail to aicp@aicp.net or by mail to the following postal address: AICP, 11130 Sunrise Valley Drive, Suite 350, Reston, VA 20191 or by utilizing the member update feature in the members-only section of www.aicp.net.

AICP may occasionally need to send members messages pertaining to their use of the services and/or the sites. These messages are limited in that they, among other things, will clearly indicate the originator of the e-mail.

What types of security procedures are in place to protect against the loss, misuse, or alteration of information?

AICP has security measures in place to protect the information under its control. While the organization makes every effort to ensure the integrity and security of its network and systems, it cannot guarantee that its security measures will prevent third-party "hackers" from illegally obtaining information. Any information that is disclosed in public areas of AICP's website, in the members-only section, or on the Internet may become public information. Members and visitors should exercise caution when deciding to disclose personally identifiable information in these areas.

Children's Privacy

AICP distributions and operations generally are not directed to individuals under the age of 13. We do not solicit or knowingly collect personally identifiable information from such individuals. If you become aware that a child has provided us with personally identifiable information, please contact us as indicated in the "How to Contact Us" section below. If we obtain actual knowledge that we have collected personally identifiable information from a child under the age of 13, we will take steps to delete such information from our database.

California Privacy Rights

If you are located in the California, you have the following additional rights.

Shine the Light

In addition to the information provided in this Privacy Policy, under California's "Shine the Light" law, California residents who provide "personally identifiable information" (as defined in the California law) in obtaining products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the personally identifiable information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of personally identifiable information and the names and addresses of those businesses with which we shared such personally identifiable information for the immediately prior calendar year. To obtain this information, please contact us by sending a letter or calling us at the contact information below.

Do-Not-Track

Some browsers give individuals the ability to communicate that they wish not to be tracked while browsing on the Internet. California law requires that we disclose to users how we treat do-not-track requests. The Internet industry has not yet agreed on a definition of what "Do Not Track" means, how compliance with "Do Not Track" would be measured or evaluated, or a common approach to responding to a "Do Not Track" signal. Due to the lack of guidance, we have not yet developed features that would recognize or respond to browser-initiated Do Not Track signals in response to California law.

In the meantime, there are technical means to prevent some of the tracking, if any.

Rights of EU Data Subjects

Scope

This section applies if you are an individual located in the European Union or European Economic Area (collectively, "EU") ("EU Data Subject").

Data Controller. AICP is the data controller for the processing of your personally identifiable information.

Legal Basis for the Processing

The grounds on which we rely to process personally identifiable information, according to the purposes identified, include the following:

Purpose	Legal Ground	Mandatory/Not
Service	The information necessary to provide the services, fulfill the requests that you make, take steps before entering into a contract with you, or perform a contract entered into with you.	No If you do not provide the information you need, we will not be able to provide certain services to you over the AICP website.
Marketing	The collection of information for marketing is needed for the legitimate interest of AICP so that it can understand its market and have opportunities to communicate with potential or current members so long that the use of the data is not overridden by the interest of the individual. Some forms of marketing to certain users may require opt-in consent, and we will request such consent as applicable	No Members and visitors have the right to object to the use of their personally identifiable information for marketing purposes. There is no consequence for not providing the information. A member or visitor who has previously consented to the use of personally identifiable information for marketing, can withdraw this consent at any time.
Marketing to Existing Member	Marketing to existing members is based on AICP's legitimate interest in expanding its relationship with individuals who have previously	No Members can opt-out of these communications at any time.

	purchased or shown interest in goods or services provided by AICP that are identical or similar to those the individual has previously purchased or requested through the AICP.	
Profiling	For some users, visitors or members, (depending on applicable law) processing is based on prior consent, collected by means of the cookie pop-up banner and/or a specific tick box.	No Individuals can elect to not consent to the collection of information about them through cookies. There is no consequence for such refusal other than not being able to benefit from greater personalization when using the AICP.
Analytics	AICP has a legitimate interest in understanding how users use its website or services, so that it can improve them accordingly both to enhance user experience, and to troubleshoot technical issues.	No
Misuse; Fraud	AICP has a legitimate interest in preventing and detecting fraudulent activities or misuse of the AICP for potentially criminal purposes.	No

Retention of Personally identifiable information

Information Uses	Retention period
Providing the Service	Retained as necessary to fulfill such purposes. We may retain the information as necessary to protect AICP's interests related to potential liability.
Market	Retained from the moment the individual gives consent (if any is required by

	<p>applicable law) until consent is withdrawn.</p> <p>If consent is withdrawn or not renewed, personally identifiable information will no longer be used for these purposes.</p> <p>We may retain the information as may be necessary to protect AICP's interests related to potential liability</p>
Marketing to Members	<p>Retained from the time when we receive it in the context of purchases or requests made via the AICP until the individual objects to this processing.</p> <p>If a user objects to the processing, the personally identifiable information will no longer be used for these purposes.</p> <p>We may retain the information as may be necessary to protect AICP's interests related to potential liability.</p>
Compliance	<p>Retained for the period required by the specific legal obligation or by the applicable law.</p>
Analytics	<p>Retained as long as necessary to fulfil the purposes for which it was collected, unless the user objects to the processing and there are no other legal grounds justifying the retention of the information.</p>
Misuse, Fraud	<p>Retained as long as necessary to fulfil the purposes for which it was collected, unless the user objects to the processing and there are no other legal grounds justifying the retention of the information.</p>

EU Data Subjects Rights. Subject to applicable law, if you are located in the EU, you have the following rights in relation to your personally identifiable information:

- **Right of access:** If you ask us, we will confirm whether we are processing your personally identifiable information, and if so, provide you with a copy of that personally identifiable information. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personally identifiable information is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your personally identifiable information with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your personally identifiable information so that you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your personally identifiable information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data

when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personally identifiable information so that you can contact them directly.

- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your personally identifiable information in certain circumstances, such as where you contest the accuracy of that personally identifiable information or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your personally identifiable information with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personally identifiable information so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your personally identifiable information from us that you consented to give us or that is necessary to perform a contract with you. We will give you your personally identifiable information in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your personally identifiable information, and we will do so:
 - If we are relying on a legitimate interest to process your personally identifiable information unless we demonstrate compelling legitimate grounds for the processing; or
 - If we are processing your Personally identifiable information for direct marketing.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your personally identifiable information including profiling, that affect you, unless such processing is necessary for entering into, or the performance of, a contract between you and us or you provide your explicit consent to such processing.
- **Right to withdraw consent:** If we rely on your consent to process your personally identifiable information, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your personally identifiable information, you can report it to the data protection authority that is authorized to hear those concerns.

Amendments

We reserve the right to amend or update this Policy at any time. We will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the AICP Website or later, as provided by applicable law. Please regularly visit this page to acquaint yourself with the latest, updated version of the Privacy Policy

You may exercise your rights by contacting us as indicated under the "Contact Us" section below.

Questions About AICP's Privacy Policy.

If members, users, or visitors have any questions about this Privacy Policy, please contact: AICP, 11130 Sunrise Valley Drive, Suite 350, Reston, VA 20191, or send an e-mail to privacy@aicp.net