



Privacy Policy 2018

Table of Contents

1. About Us
2. Definition of terms
3. Policy Objective and Overview
4. Application of Local Laws
5. Principles for Processing Data
6. Who do we collect personal information about?
7. When do we collect personal information?
8. What personal information do we collect from you?
9. How do we collect your personal information?
10. Purposes for Personal Data Processing (sensitive and non-sensitive)
11. Purposes for Personal Data Processing (sensitive and non-sensitive) for Employees
12. Who do we share your personal information with?
13. Security and Confidentiality
14. Rights of Data Subjects
15. How we protect your personal information
16. How long we keep your personal information
17. Data Transfers in the U.S. and Internationally
18. Marketing
19. Other Websites
20. Pixel Tags
21. Automated Decisions
22. Enforcement Rights and Mechanisms
23. Communication about the Policy
24. Obligations toward Data Protection Authorities (DPAs)

1. About us

Sweet Adelines International, a 501(c)(3) non-profit corporation with international headquarters office located at 9110 South Toledo Avenue, Tulsa, Oklahoma, 74137 United States of America.

We may be contacted via telephone at:

918.622.1444

or

1.800.992.7464

In this Privacy Policy, references to “we” or “us” or “SA” are to Sweet Adelines International, our Chapters, Regions and/or Quartets.

2. Definition of terms

TERM	DEFINITION
“Consumer”	Any natural person, but excludes any individual acting in his or her capacity as an Employee.
“Controller”	A person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
“Data Protection Officer”	The individual designated by Sweet Adelines International as the initial point of contact at International Headquarters for inquiries, complaints, or questions regarding privacy matters. Currently, such officers are identified at the end of this Policy.
“Data Protection Coordinator”	The individual designated at the Chorus and Region level as the point of contact for inquiries, complaints, or questions regarding privacy matters at the Chorus or Region level.
“Employee”	Any current, former or prospective employee, temporary worker, intern or other non-permanent employee of Sweet Adelines International or any current or prospective subsidiary or affiliate of Sweet Adelines International.
“European Economic Area (“EEA”)”	Includes the following countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Republic of Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the UK (England, Scotland, Wales, & Northern Ireland).
“Personal Data”	Any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by

	reference to an identification number or to one or more factors specific to his or physical, physiological, mental, economic, cultural or social identity and includes information, that (i) relates to an identified or identifiable Member, Employee or Supplier’s representative; (ii) can be linked to that Member, Employee or Supplier’s representative; (iii) is transferred to Sweet Adelines International in the U.S. from the EEA or Switzerland, and (iv) is recorded in any form.
“Privacy Shield”	The EU-US Privacy Shield framework and agreement between the United States of America, via the US Department of Commerce and the EEA relating to the protection of Personal Data.
“Privacy Shield Principles”	The Principles and Supplemental Principles of the Privacy Shield.
“Processing”	Any action that is performed on Personal Data, whether in whole or in part by automated means, such as collecting, modifying, using, disclosing, or deleting such data.
“Sensitive Personal Data”	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership or concerning health or sex, and the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.
“Supplier”	Any supplier, vendor or other third party located in the USA and/or the EEA or Switzerland that provides services or products to Sweet Adelines International. For the purposes of this Policy Suppliers shall be included within the definition of “Consumers” above.
“Sweet Adelines International entities (“Sweet Adelines International”)	Refers to Sweet Adelines International and all Regions, Chapters, and Quartets affiliated with Sweet Adelines International.

This Policy does not cover data rendered anonymous or where pseudonyms are used. Data is rendered anonymous if individuals are no longer identifiable or are identifiable only with a disproportionately large expense in time, cost or labor. The use of pseudonyms involves the replacement of names or other identifiers with substitutes, so that identification of individual persons is either impossible or at least rendered considerably more difficult. If data rendered anonymous become no longer anonymous (i.e. individuals are again identifiable), or if pseudonyms are used and the pseudonyms allow identification of individual persons, then this Policy shall apply again.

3. Policy Objective

The aim of this Privacy Policy (“the Policy”) is to provide adequate and consistent safeguards for the protection of individuals with regard to the processing of Personal Data (as defined in Section #2), the free movement of such data, as well as the collection, storage, use, transfer, and other processing of personal data by all “Sweet Adelines International entities” (as defined in Section #2).

The Privacy Policy developed in light of the European Union development of the General Data Protection Regulation, and is intended to be consistent with the intent of that regulation, particularly as it relates to the transfers of personal data from the European Economic Area to the United States and other countries.

As an international women’s membership-based organization dedicated to advancing the musical art form of barbershop harmony through opportunities in education, performance, and competition, we understand the importance of maintaining your privacy, keeping your personal information secure and complying with data protection laws.

We are the data controller of any personal information you provide to us. This means that we have responsibilities related to your privacy and your data. This privacy policy describes what personal information we may collect from you, why we use your personal information and, more generally, the practices we maintain and ways in which we use your personal information.

By providing your personal information to us, you acknowledge that we may use it in the ways set out in this privacy policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information. We may also give you the ability to opt-in or opt-out of selected uses such as marketing when we collect your personal information.

If you are registering other people for one of our events, or if you are a key contact at SA’s headquarters, a Chorus, Quartet, or Region and are providing personal information about members and/or alternative contacts such as individual members, you must ensure this privacy policy has been drawn to the attention of those individuals and that you have permission to share their information with us.

From time to time, we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check the SA website periodically to view the most up to date privacy policy.

4. Application of Local Laws

This Policy is intended to promote compliance with all relevant applicable laws. Sweet Adelines International recognizes that certain laws might be modified to require stricter standards than those described in this Policy, in which case the stricter standards shall apply. Sweet Adelines International will handle Personal Data in accordance with local law at the place where the Personal Data is processed. If applicable law provides for a lower level of protection of Personal

Data than that established by this Policy, then this Policy shall prevail. Any questions about applicable legislation and Sweet Adelines International's compliance with it shall be addressed to Sweet Adelines International.

5. Principles for Processing Data

Sweet Adelines International respects Employee, Member, Donor, Consumer, and third party privacy and is committed to protecting Personal Data. Sweet Adelines International desires to keep its Employees, Members, Donors and Consumers informed and to recognize and respect their privacy rights. Sweet Adelines International will observe the following principles when processing Personal Data:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified, legitimate purposes and not processed further in ways incompatible with those purposes.
- Data will be relevant to and not excessive for the purposes for which they are collected and used. For example, data may be rendered anonymous if deemed reasonable, feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses.
- Data subjects in the EU will be asked to provide their clear and unequivocal consent for the collection, processing and transfer of their Personal Data.
- Data will be accurate and, where necessary kept up-to-date. Reasonable steps will be taken to rectify or delete Personal Data that is inaccurate or incomplete.
- Data will be kept only as it is necessary for the purposes for which it was collected and processed. Those purposes shall be described in this Policy.
- Data will be deleted or amended following a relevant request by the concerned data subject, should such notice comply with the applicable legislation each time.
- Data will be processed in accordance with the individual's legal rights (as described in this Policy or as provided by law).
- Appropriate technical, physical and organizational measures will be taken to prevent unauthorized access, unlawful processing and unauthorized or accidental loss, destruction or damage to data. In case of any such violation with respect to Personal Data, Sweet Adelines International will take appropriate steps to end the violation and determine liabilities in accordance with applicable law and will cooperate with the competent authorities.

6. Who do we collect personal information about?

- present, past and prospective SA members;
- present, past and prospective employees of SA;
- individuals who attend SA events;
- individuals who enquire into SA membership;
- individuals who apply for scholarships;
- users of the SA website;
- donors;
- arrangers;

- directors;
- judges;
- educators;
- people who purchase our merchandise, music, *Pitch Pipe* magazine;
- members of the public who have contact with SA

7. When do we collect personal information?

We may collect your personal information if you:

- ask to be part of a mailing or marketing campaign;
- apply to be a SA member and throughout such membership;
- register (or someone on your behalf registers you) to attend a SA event;
- subscribe (or someone on your behalf subscribes for you) to receive marketing communications and/or industry updates from SA;
- make a donation;
- apply for a scholarship;
- enquire into SA membership but do not sign up;
- contact us via telephone; or
- use our website (for more information please see Section 21 on Pixel Tags).

8. What personal information do we collect from you?

We may collect the following (*non-sensitive*) personal information from **MEMBERS, DONORS and/or CONSUMERS**:

- name;
- email address;
- personal phone number;
- personal address;
- date of birth;
- your photo
- personal data in content members/consumers provide on Sweet Adelines International’s website and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits);
- financial information (for example credit card details for events or for expenses purposes);
- SA membership number; and
- password to the SA website members’ section.

Donor-Specific Information:

- Wills and Trust and related supporting documents if necessary;
- Insurance policy documents if necessary;

- Information related to intended beneficiaries if necessary;
- Investment related documentation if necessary;
- Real Property and Personal Property information if necessary;
- Other information as deemed necessary during course of communications.

We may also collect the following *sensitive* personal information from **MEMBERS and/or CONSUMERS**:

- we may collect information related to your physical condition in order to facilitate use of a scooter or other mobility assistance at our International Convention or other event.

Sweet Adelines International also may obtain and use Member, Donor and/or Consumer Personal Data in other ways for which Sweet Adelines International provides specific notice at the time of collection (including but not limited to e.g. surveys, focus groups, market research, inbound and outbound communications and education, event registration, etc.).

As permitted by local laws, the Personal Data relating to **EMPLOYEES** may include the following:

- name;
- contact information;
- date of birth;
- your photo
- government-issued identification information, passport or visa information;
- educational history;
- employment and military history;
- legal work eligibility status;
- information about job performance and compensation;
- financial account information; and
- other information Employees may provide.

9. How do we collect your personal information?

The ways by which Sweet Adelines International obtains Personal Data are defined hereby. Sweet Adelines International does not obtain any personal information about Employees, Members, Donors or Consumers unless the Employee, Member, Donor or Consumer has provided that information to Sweet Adelines International in a way providing for its clear and unequivocal consent to do so including but not limited to the list below.

We may collect your (non-sensitive) personal and sensitive personal information:

- face-to-face (directly from you);
- by telephone;
- by email;
- via our website

- via membership forms (submitted directly by you and by your organization);
- via various events attendance lists;
- via direct debit forms and expenses claim forms;
- via surveys sent or commissioned by SA;
- from survey data collected through third party surveys;
- via our computer database systems, including our SA conference system;
- via the key contact at your organization (through your chorus or quartet) who is responsible for registering all applicable members;
- from individuals or members who have registered you for an event;
- from event organizers, exhibitors and any other such third parties who are involved in organizing or contributing to SA events and/or the SA convention;
- from delegate lists obtained from third party events;
- from people working on our behalf, whether as a paid consultant or on a voluntary basis on our boards and/or committees including but not limited to our regional committees;
- from publicly available sources including but not limited to internet search engines, public records and registers and social media (e.g. Facebook, LinkedIn and Twitter).
- by completion of a written employment application
- by an employee benefits application
- by employee insurance form
- by employee consent form
- through completion of on-line or hard copy forms

Employees, Members, Donors and Consumers may choose to submit personal, private information by facsimile, regular mail, e-mail, or electronic transmission over our internal web site, interoffice mail, or personal delivery, as each of these methods may be deemed applicable each time.

10. Purposes for Personal Data Processing (sensitive and non-sensitive) for Members, Donors, Consumers and/or Suppliers

For Member, Donor and Consumer-specific Personal Data, the purposes of processing may include:

- Running day-to-day business relationship
- Marketing activities
- Photos of events
- Mailing Pitch Pipe editions
- Management of financial records
- Business Development Activities
- Conduct of transactions or facilitation of offering of Sweet Adelines International Services
- Conduct of surveys, focus groups, market research, inbound and outbound communications and education
- Process Donor activities

For Supplier specific information, the purposes of processing may include:

- Management of its relationships with its Clients and Suppliers
- Processing payments, expenses and reimbursements
- Carrying out Sweet Adelines International’s obligations under such contracts

If Sweet Adelines International introduces a new process or application that will result in the processing of Personal Data for purposes that go beyond the purposes described above, Sweet Adelines International will inform the concerned data subjects of such new process or application, new purpose for which the Personal Data are to be used, and the categories of recipients of the Personal Data.

Under data protection laws, for each purpose we must be able to rely on a legal ground to justify why we are using your (non-sensitive) personal information. The three primary legal grounds that we may rely on are:

For processing (non-sensitive) personal information	
Legal ground	Details
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party to or in order to take steps at your request prior to entering into a contract
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject
For our legitimate interests where these do not cause you undue harm	<p>Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal information.</p> <p>Our main legitimate interests for using your personal information are:</p> <p>(1) to enable us to run our membership organization; and</p> <p>(2) to promote SA services and the value of the services that we offer our members.</p>

When we use your sensitive personal information (for example, information about your health, typically related to your need for a scooter at an event) we must be able to rely on an additional legal ground. The additional legal grounds that we may rely on in these instances are:

For processing sensitive personal information	
Your explicit consent	You have given your explicit consent to the processing of your sensitive personal information for one or more specified purposes.

	You may withdraw your consent at any time by contacting us. If you do so, you may not be able to receive the benefit of some of our services where in order to provide them, we rely on your explicit consent to process your sensitive personal information.
For legal claims	Processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.
You have made this information public	You have made your sensitive personal information manifestly public.

For every use of your personal information, we have set out the relevant legal grounds that we will rely on and where relevant, the additional legal grounds that we rely on when we use your sensitive personal information.

A. Where you benefit from SA membership, the personal information that we collect about you may be used:

Use of personal information	Legal Grounds
<p>1. To administer your SA membership.</p> <p><i>As part of your membership, we need to carry out our obligations arising from the membership contract and general membership service activities such as invoicing and confirmation emails.</i></p>	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests
<p>2. To send you any guides, documentation, email alerts or other information relevant to SA membership</p>	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests
<p>3. To administer your expenses for meetings held at SA events</p>	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests
<p>4. To track email readership</p>	<ul style="list-style-type: none"> • our legitimate interests
<p>5. To share your details with regional committees</p>	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests
<p>6. To personalize your experience on the SA website</p>	<ul style="list-style-type: none"> • our legitimate interests
<p>7. To track the use of the SA website</p>	<ul style="list-style-type: none"> • our legitimate interests

B. Where you (as an employee of SA or non-member) register for and/or attend an SA event, the personal information that we collect about you may be used:

Use of personal information	Legal Grounds
<p>1. For event administration</p> <p><i>Where you have registered for an SA event such as the SA convention and/or regional events, we will use your personal information to:</i></p> <ul style="list-style-type: none"> • <i>process bookings;</i> • <i>send you the relevant information pack and to confirm details;</i> • <i>include your name on the member list which is available to other members (unless you have indicated to us that you do not want your details to appear on such lists) and third parties such as event organizers, regional committees, exhibitors and speakers;</i> • <i>to produce name badges;</i> • <i>to make necessary security, catering and all other event related arrangements; and</i> • <i>for any other necessary purpose related to the running of our events.</i> 	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests <p>Additional legal grounds for sensitive personal information?</p> <ul style="list-style-type: none"> • explicit consent
<p>2. For marketing purposes</p> <p><i>We and/or our partners, including exhibiting companies at events, may send you marketing emails where you have expressed an interest in receiving them. For more information about marketing communications, please see Section 18 on Marketing.</i></p>	<ul style="list-style-type: none"> • performance of our contract with you • our legitimate interests

C. Where you inquire into SA membership but do not sign up, the personal information that we collect about you may be used:

Use of personal information	Legal Grounds
<p>1. To provide information about SA membership</p>	<ul style="list-style-type: none"> • our legitimate interests • performance of your request
<p>2. To provide information about SA events (including regional events)</p>	<ul style="list-style-type: none"> • our legitimate interests • performance of your request

D. Where you are a member of the public, the personal information that we collect about you may be used:

Use of personal information	Legal Grounds
1. To provide you with additional SA information	<ul style="list-style-type: none"> • our legitimate interests • performance of your request

11. Purposes for Personal Data Processing (sensitive and non-sensitive) for Employees

Sweet Adelines International processes personal data for legitimate purposes related to human resources, business and safety/security. The limitation of purposes shall be taken into consideration before any type of processing of Personal Data and shall not be subject to any changes without prior notification. These principal purposes for Employee Personal Data include:

Human Resources purposes including but not limited to recruiting and hiring job applicants, and:

- Managing Employee communications and relations
- Providing compensation and benefits;
- Administering payroll;
- Processing corporate expenses and reimbursements;
- Managing Employee participation in human resources plans and programs;
- Carrying out obligations under employment contracts;
- Managing Employee performance;
- Conducting training and talent development;
- Facilitating Employee relocations and international assignments;
- Managing Employee headcount and office allocation;
- Managing the Employee termination process;
- Managing information technology and communications systems, such as the corporate email system and organization directory;
- Conducting ethics and disciplinary investigations;
- Administering Employee grievances and claims;
- Managing audit and compliance matters;
- Complying with applicable legal obligations, including government reporting and specific local law requirements; and
- Other general human resources purposes.

Sweet Adelines International may also obtain and process Personal Data about Employees' emergency contacts and other individuals (such as spouse, family members, dependents and beneficiaries) to the extent Employees provide such information to Sweet Adelines International. Sweet Adelines International processes this information to comply with its legal obligations and for benefits administration and other internal administrative purposes.

12. Who do we share your personal information with?

We may disclose your personal information to the third parties listed below for the purposes described in this privacy policy. You can contact us for details of specific disclosures made in respect of your personal information. The third parties listed below will only use your personal information under our strict instruction and are under an obligation to ensure appropriate security measures are in place.

- Insurers;
- Professional advisors including auditors, lawyers, tax advisors;
- IT service providers;
- Event organizers, event exhibitors and any other such third parties who are involved in organizing or contributing to SA events and/or the SA conference;
- Regional committees including chairmen and event organizers;
- Providers of our accounting and database software system; and
- Other SA members in positions of leadership in Regions, Chapters, Quartets.

We may also disclose your personal information to other third parties where:

- the disclosure is required by law or by a regulator with authority over us or you, such as where there is a court order or statutory obligation; and
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

13. Security and Confidentiality

Sweet Adelines International is committed to taking appropriate technical, physical and organizational measures to protect Personal Data against unauthorized access, unlawful processing, accidental loss or damage and unauthorized destruction.

1. Equipment and Information Security

To safeguard against unauthorized access to Personal Data by third parties outside Sweet Adelines International, all electronic Personal Data held by Sweet Adelines International are maintained on Systems that are protected by up-to-date secure network architectures that contain firewalls and intrusion detection devices. The data saved in servers is “backed up” (i.e. the data are recorded on separate media) to avoid the consequences of any inadvertent erasure, destruction or loss otherwise. The servers are stored in facilities with high security, access protected to unauthorized personnel, fire detection and response systems. The location of these servers is known to a limited number of Sweet Adelines International’s Employees.

2. Access security

The importance of security for all personally identifiable information associated with Sweet Adelines International’s Employees is of highest concern. Sweet Adelines International is

committed to safeguarding the integrity of personal information and preventing unauthorized access to information maintained in Sweet Adelines International's databases. These measures are designed and intended to prevent corruption of data, block unknown and unauthorized access to our computerized system and information, and to provide reasonable protection of Personal Data in Sweet Adelines International's possession. All employee files are confidentially maintained in the Human Resources department in secured and locked file cabinets or rooms. Access to the computerized database is controlled by a log-in sequence and requires users to identify themselves and provide a password before access is granted. Users are limited to data required to perform their job function. Security features of our software and developed processes are used to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

3. Training

Sweet Adelines International will be responsible for conducting adequate training sessions regarding the lawful, enumerated intended purposes of processing Personal Data, the need to protect and keep information accurate and up-to-date, the lawful purposes of collecting, handling and processing data that is transferred from the EU to the US and the need to maintain the confidentiality of the data to which employees have access. Authorized users will comply with this Policy and Sweet Adelines International will take appropriate actions in accordance with applicable law, if Personal Data are accessed, processed, or used in any way that is inconsistent with the requirements of this Policy.

14. Rights of Data Subjects

All Employees, Members, Donors and Consumers have access to their own personal information and may correct or amend it as needed. Employees may view their own personnel record upon request by contacting the Human Resources Department. Members, Donors and Consumers may contact the appropriate Data Protection Officer or Data Protection Coordinator to review, update, and revise their Personal Data.

1. The right to access your personal information

Subject to any relevant exemptions, you are entitled to request to see a copy of the personal information we hold about you to request details of how we use your personal information including any disclosures made and may request deletion or amendments. To exercise your rights to access your personal information, please contact us at 1.800.992.7464 or 918.622.1444.

Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case your personal information will be provided to you by electronic means where possible.

We shall provide information on action taken regarding your request without undue delay and in any event within one month (30 days) of receipt of your request.

2. The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any personal information we hold about you, please contact us at 1.800.992.7464 or 918.622.1444. We shall provide information on action taken regarding your request without undue delay and in any event within one month (30 days) of receipt of your request.

If the person demonstrates that the purpose for which the data is being processed is no longer legal or appropriate, the data will be deleted, unless the applicable law requires otherwise.

3. The right to withdraw consent to marketing

As set out in Section 18 on Marketing, you are entitled to withdraw consent to receiving marketing material from us at any time. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting us at 1.800.992.7464 or 918.622.1444. We shall provide information on action taken regarding your withdrawal without undue delay and in any event within one month (30 days) of receipt of your contact.

4. The right to complain to the Data Protection Officer

If you are not satisfied with our use of your personal information, our response to any exercise of your rights set out in this section, or if you believe us to be in breach of our data protection obligations, you have the right to complain to the Data Protection Officer, Joey Bertsch, at joey@sweetadelines.com.

5. Other rights

Under certain conditions, you may also have the right to require us to:

- delete any personal information that we no longer have a legal ground to rely on;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legal ground of legitimate interests unless our reason for undertaking that processing outweighs any prejudice to your data protection rights;
- provide you or another provider with a copy of your personal information that you provided us with; and
- restrict how we use your personal information while a complaint is being investigated.

If you contact us to exercise any of these rights, we will confirm your right to do so and shall provide information on actions taken without undue delay and in any event within one month (30 days) of receipt of your contact.

15. How we protect your personal information

Sweet Adelines International is committed to keeping your personal information secure. We keep your personal information in a secure server and have appropriate security measures in place in our physical facilities.

While we strive to protect your personal information, due to the nature of the internet, we cannot guarantee the security of any information you transmit to us. With this in mind, any transmission is at your own risk and we urge you to take every precaution to protect your personal information while you are online.

16. How long we keep your personal information

We only keep your personal information for as long as is reasonably necessary to fulfill the relevant purposes described in this privacy policy or if required by law, we may keep your information for longer.

17. Data Transfers in the U.S. and Internationally

We (or third parties acting on our behalf) may store or process personal information that we collect about you in countries outside the European Economic Area (“EEA”) and more specifically to: (i) Sweet Adelines International’s headquarters in Tulsa, Oklahoma, USA; (ii) Sweet Adelines International’s different affiliated entities in the US; (iii) Sweet Adelines International affiliated entities in other countries. Personal Data might be sent to the following third parties in or outside the EEA:

- **Selected Third Parties:** Sweet Adelines International will not disclose or share any personal information with any external entity or third party, except to an employee’s designated insurance provider, employee benefits administrator, travel professionals, clients to illustrate experience and qualifications for business purposes or promotion and not beyond that, to third party vendors and/or marketers upon Consumer’s explicit consent or as an employee or consumer may designate.
- **Other Third Parties:** Sweet Adelines International may be required to disclose certain Personal Data to other third parties: (i) As a matter of law (e.g. to tax and social security authorities); (ii) to protect Sweet Adelines International’s legal rights; (iii) in an emergency where the health or security of an employee or member is endangered (e.g. a fire); (iv) to Law Enforcement Authorities in accordance with the relevant legislation in the different EEA Member States.

In the event that we transfer your personal information outside the EEA, we will ensure that an adequate level of protection is in place to protect your personal information such as putting in place contractual protections which have the purpose of ensuring the security of any information passed and putting in place technical and organizational security measures to prevent the loss or unauthorized access of your personal information.

18. Marketing

We are committed to only sending you marketing communications that you have expressed an interest in receiving. More information about the marketing communications that we send to SA members can be found below.

Where you have registered for an event, whether you are an SA member or not, we may also send you marketing emails related to the event that you have registered for, for example, providing details of the exhibitors appearing. You can unsubscribe from such emails at the time of registering for the event or at any time subsequently by clicking the unsubscribe link at the bottom of any email or by contacting us at 1.800.992.7464 or 918.622.1444.

Where you are a non-member but you attend an SA event, unless you tell us otherwise, you will receive annual emails relating to upcoming SA events. You can opt-out of further emails related to the current year's convention or all future SA communications by following the link appearing at the bottom of any email.

Where you are an SA member:

We are committed to sending you, as an SA member, marketing communications that you have expressed an interest in receiving by becoming an SA member including:

- The Pitch Pipe – the SA member magazine;
- Other publications and guides;
- Regulation and compliance rules updates;
- Technical updates;
- Details of regional and international events;
- Monthly video and update from the International President;
- General updates;
- Training updates;
- Updates on events and products;
- Membership and research surveys; and
- Communications from SA approved third party providers. As well as sending you details of SA approved providers, we may also share your personal information with such providers so they can provide you with those details directly.

If you wish to unsubscribe from the communications sent by us to you as part of your SA membership, you may do so at any time by clicking on the “unsubscribe” link that appears at the bottom of all SA or partner marketing email communications. Otherwise, you can always contact SA at 1.800.992.7464 or 918.622.1444.

However, please note that individuals who are key contacts at their SA member organization will receive essential emails, which will include at a minimum, convention and membership renewal emails.

As part of your SA membership, you will also receive annual emails relating to the next annual SA conference. You can opt-out of further emails relating to the current year's conference by following the link appearing at the bottom of any conference email.

19. Other Websites

SA's websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third party websites.

20. Pixel Tags

Pixel tags (also called clear gifs or web bugs) are used to track who is reading a web page or e-mail, when, and from what computer.

They provide us with information about your interaction with our email messages (if you receive messages in html format) and to record some of the pages you consequently visit on our website.

We use this information so we can provide you with information tailored to your needs and interests, better plan our future campaigns and upgrade visitor information used in reporting statistics.

Pixel tag technology is used to analyze the reading habits of our membership in order to review and improve services to members and on occasion may use this for marketing purposes. Questions about this technology should be directed to the SA Information Technology Department at 918.622.1444 or 1.800.992.7464.

21. Automated Decisions

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved.

Sweet Adelines International does not make automated decisions for Employee, Member, Donor or Consumer data. If automated decisions are made, affected persons will be given an opportunity to express their views on the automated decision in question and object to it.

22. Enforcement Rights and Mechanisms

Sweet Adelines International will ensure that this Policy is observed and duly implemented. All persons who have access to Personal Data must comply with this Policy. Violations may lead to penalties and/or claims for damages.

If at any time, a person believes that Personal Data relating to him or her has been processed in violation of this Policy, he or she may report the concern to the competent Sweet Adelines International's official. In particular, if you have any inquires or complaints about the use or limitation of use of your personal information, you may contact your local data protection coordinator or IT department at corporate headquarters:

Corporate Headquarters:

Sweet Adelines International
9110 South Toledo Avenue
Tulsa, OK 74137
918.622.1444
1.800.992.7464

Or contact: Joey Bertsch, Data Protection Officer, at joey@sweetadelines.com

23. Communication about the Policy

In addition to the training on this Policy, Sweet Adelines International will communicate this Policy to current and new employees, members, and consumers by posting it on the organization's websites as well as on selected internal Sweet Adelines International websites and by providing a link to the Policy on information technology applications where Personal Data are collected and processed.

1. MODIFICATIONS OF THE POLICY

Sweet Adelines International reserves the right to modify this Policy as needed, for example, to comply with changes in laws, regulations or requirements. Changes must be approved by Sweet Adelines International's Data Protection Officer, outside attorney, or their designees, who will seek input as they reasonably deem appropriate from corporate executives such as the CEO, CFO, and COO, for the amended Policy to enter into force. If Sweet Adelines International makes changes to the Policy, this amended Policy will be submitted for renewed approval according to the relevant applicable provisions of the law. Sweet Adelines International will inform Sweet Adelines International Employees, Members, Donors and Consumers and other persons (e.g. persons accessing Sweet Adelines International websites to enter Personal Data such as job application information) of any material changes in the Policy. Sweet Adelines International will post all changes to the Policy on relevant internal and external websites.

Effective with the implementation of this Policy, all existing privacy guidelines relating to the collection and/or processing of Personal Data will, where in conflict, be superseded by the terms of this Policy. No other internal policy that conflicts with this Policy shall be applicable with respect to the protection of Personal Data handled by Sweet Adelines International. All parties to such agreements will be notified of the effective date of the implementation of the Policy.

Please contact us if you have any questions about our privacy policy or the information we hold about you.

You can contact us by email at joey@sweetadelines.com or by writing us at Data Protection Officer, Information Technology Department, Sweet Adelines International, 9110 S. Toledo Ave, Tulsa, OK 74137.

24. Obligations toward Data Protection Authorities (DPA)

Sweet Adelines International will respond diligently and appropriately to requests from DPAs about this Policy or compliance with applicable data protection privacy laws and regulations. Sweet Adelines International's employees who receive such requests should contact their human resources manager or business legal counsel. Sweet Adelines International will, upon request, provide DPAs with names and contact details of relevant persons. With regard to transfers of Personal Data between Sweet Adelines International entities, the importing and exporting Sweet Adelines International entities will (i) cooperate with inquiries from the DPA responsible for the entity exporting the data and (ii) respect its decisions, consistent with applicable law and due process rights. With regard to transfers of data to third entities, Sweet Adelines International will comply with DPAs' decisions relating to it and cooperate with all DPAs in accordance with applicable legislation.