

## PRIVACY POLICIES FOR THE ACRN OXFORD LTD

### ACRN Oxford Ltd. Privacy Policy

At ACRN, we respect your privacy. We want to ensure that you get the information, content, and experiences that matter most to you. ACRN is committed to protecting the privacy of its members, customers and other contacts.

### Scope

This privacy policy applies to all personal data processed by members and clients of ACRN as well as partners doing business with ACRN in all countries.

### What information do we collect?

ACRN collects the following personal data in line with the use purposes explained in a subsequent section:

- - Your name and contact details
- - Emergency contact information
- - Education and professional information
- - Payment information
- - Registration and participation in ACRN events and activities
- - Subscription preferences
- - Authentication data
- - Location information
- - Author and peer review information
- - Other information you upload or provide to us

### How do we use your information?

ACRN uses (and, where specified, shares) your personal information for the following purposes:

**To process transactions.** ACRN uses personal information such as name, physical address, telephone number, email address, and company/institution to engage in interactions with you, including contacting you about your order, subscription, event participation, or membership. We use financial/credit card and payment information to process your order and may need to share some of this information with delivery services, credit card clearing houses, and other third parties to complete the transaction.

**To provide support or other services.** ACRN may use your personal information to provide you with support or other services that you have ordered or requested. ACRN may also use your personal information to respond directly to your requests for information, including registrations for newsletters, conferences, courses or other specific requests.

**To provide information based on your needs and respond to your requests.** ACRN may use your personal information to provide you with notices of new service developments and events.

**To administer products.** ACRN may contact you if you purchase products to confirm certain information about your order (for example, that you did not experience problems in the download process). We may also use this information to confirm compliance with licensing and other terms of use and may share it with your company/institution.

**To communicate with you about a meeting, conference, or event.** We may communicate with you about a meeting, conference, or event hosted by ACRN. This may include information about the event's content, event logistics, payment, updates, and additional information related to the event. Information you provide when registering for or participating in a conference managed or co-sponsored by parties, other than or in addition to ACRN may be shared with those parties, and the treatment of such information is further subject to the privacy policies of those parties. ACRN and its

conference co-sponsors may contact you after the event about the event, subsequent iterations of the event and related events. Please note that ACRN conference, meeting or event organizers, co-sponsors, exhibitors, and other third parties may directly request your personal information at their conference booths or presentations. Providing your information to them is optional, and you should review their privacy policies to address your particular needs and concerns about how they will treat your personal information.

**To include you in ACRN Member Directories.** If you are an active member of ACRN, at your request, we may include your information in ACRN Member Directory. We may also enable private member to member messaging (your email address is never shared). Active members can customize their member directories visibility preferences any time in account settings.

**To assist in your participation in ACRN activities.** ACRN will communicate with you, if you are participating in certain ACRN activities such as ACRN conferences or authoring or reviewing in the ACRN Oxford Journal of Finance and Risk Perspectives. ACRN may send you information such as newsletters related to those activities.

**To update you on relevant ACRN benefits, programs, and opportunities.** ACRN may communicate with you regarding relevant ACRN benefits, programs, and opportunities available to you, through your membership(s) with ACRN.

**To engage with third parties.** ACRN may share your personal data with third parties in connection with services that these individuals or entities perform for or with ACRN. These third parties are restricted from using this data in any way other than to provide services for ACRN. These third parties are carefully selected by ACRN and obligated to keep your data secure. From time to time, we may also share your information with third parties whom we think might provide content, products, or services of interest to you.

**To protect ACRN content and services.** We may use your information to prevent potentially illegal activities and to enforce our terms and conditions. We also use a variety of technological systems to detect and address anomalous activity and to screen content to prevent abuse, such as spam. These efforts may, on occasion, result in a temporary or permanent suspension or termination of some functions for some users.

**To get feedback or input from you.** In order to deliver products and services of most interest to our customers, from time to time, we may ask members and customers to provide us input and feedback (for example through surveys, usability studies).

**To protect ACRN information assets as well as your own personal data.** The ACRN Information Security Program protects the confidentiality, integrity, and availability of ACRN information assets by following a risk management approach based on policies, standards, guidelines, and procedures to meet security objectives while supporting business and operational goals.

### **How can you control your information?**

You can control the information we have about you and how we use it in several ways.

- - Use the unsubscribe method provided in our various communications
- - send an email to [seeds@acrn.eu](mailto:seeds@acrn.eu) for any information on what we have stored

### **How will you know if the Privacy Policy is changed?**

ACRN may update its Privacy Policy from time to time. If we make any material changes we will notify you by email if you are an ACRN member, or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Technical and regulatory information**

### **Logging practices**

ACRN automatically records the Internet Protocol (IP) addresses of visitors. The IP address is a unique number assigned to every computer on the internet. Generally, an IP address changes each time you connect to the internet (it is a "dynamic" address). Note, however, that if you have a broadband connection, depending on your individual circumstance, the IP address that we collect may contain information that could be deemed identifiable. This is because, with some broadband connections, your IP address doesn't change (it is "static") and could be associated with your personal computer.

As well as recording the IP addresses of users, ACRN may also keep track of sites that users visited immediately prior to visiting ACRN's website and the search terms they used to find it. We keep track of the pages visited on ACRN's website, the amount of time spent on those pages and the types of searches done on them. Your searches remain confidential and anonymous. ACRN uses this information only for statistical purposes to find out which pages users find most useful and to improve the website.

ACRN also captures and stores information that you transmit. This may include:

- Browser/Device type/version
- Operating system used
- Media Access Control (MAC) address
- Date and time of the server request
- Volume of data transferred

### **External links behavior**

Some of ACRN's websites link to other sites created and maintained by other public- and/or private-sector organizations. ACRN provides these links solely for your information and convenience. When you transfer to an outside website, you are leaving the ACRN domain, and ACRN's information management policies no longer apply. ACRN encourages you to read the privacy statement of each external website that you visit before you provide any personal data.

### **Cookies and web beacons**

Cookies and web beacons are electronic placeholders that are placed on your device by websites to track your individual movements on that website over time. ACRN uses both session-based cookies (which last only for the duration of the user's session) and persistent cookies (which remain on your device and provides information about the session you are in and waits for the next time you use that site again).

These cookies and web beacons provide useful information to ACRN, enabling us to recognize repeat users, facilitate the user's access to and use of our sites, allows us to track usage behavior, and to balance the usage of our websites on all ACRN web servers.

Tracking cookies, third-party cookies, and other technologies such as web beacons may be used to process additional information, enable non-core functionalities on the ACRN website and enable third-party functions (such as a social media "share" link). We may also include web beacons and other similar technology in promotional email messages to determine whether the messages have been opened.

### **Do Not Track (DNT)**

The online advertising industry has self-regulatory initiatives designed to provide consumers a choice in the types of ads they may see online and to conveniently opt-out from online behavioral ads served by some or all of the companies participating in these programs. Our websites do not respond to DNT consumer browser settings.

### **Collaboration with authorities**

ACRN has appointed and mandated a privacy officer who represents the regulatory authorities inside the ACRN organization, and in return represents the ACRN organization to regulatory authorities.

The ACRN privacy officer will ensure proper communication with the relevant regulatory authority for privacy. The privacy officer will lead investigative action, complaint handling and data breach notification. The privacy officer will also monitor regulatory changes and consult the regulatory authority where implementation of a regulatory or technological change leads to doubt.

### **Transfer of information to other countries**

As a global organization, ACRN engages in a number of international activities. In connection with the management of those activities, ACRN may transfer information to other countries. By submitting your information to ACRN via the websites, or in connection with your interactions with ACRN offline, you consent to such transfers and to the processing of this information in other countries.

### **Responses to legal requests**

ACRN reserves the right to share your information to respond to duly authorized information requests of governmental authorities or where required by law.

In the event of bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. The promises in this privacy policy will apply to your information as transferred to the new entity.

### **Your European Union privacy rights**

Under the General Data Protection Regulation (Regulation EU 2016/679) (also known as GDPR), if you are an individual protected by the GDPR you may have certain rights as a data subject. To request information about or avail yourself of those rights, please send an email to [seeds@acrn.eu](mailto:seeds@acrn.eu) with "GDPR Request" in the subject line. In the email please describe, with specificity, the GDPR right you are requesting assistance with. Please note additional information may be requested prior to initiation of a request and that ACRN reserves the right to charge a fee with respect to certain requests. Upon ACRN's completion of its review you will be notified if your request has been granted, denied, or exemptions apply.

### **How do I contact you if there is an issue?**

If you have any questions or concerns about this Privacy Policy or about the use of your personal information, please feel free to contact us by email [seeds@acrn.eu](mailto:seeds@acrn.eu).