

# **American Institute of Architects International Region Privacy Policy**

## **PRIVACY POLICY**

This privacy notice describes how “AIA International Region, a Region of The American Institute of Architects, hereafter referred to as “this Region”, “AIA Component”, “we”, “our”, or “us” AIA International Region, 1735 New York Avenue, NW Washington DC 20006-5292, United States collects and processes information about individuals. This privacy policy explains how we collect, use, retain and share personal information that you provide to us, or that we collect, when you use the AIA International Region website, located at [www.aiainternational.org](http://www.aiainternational.org) and other websites owned or controlled by this Region (“the Websites”) or related mobile applications, use AIA Component products and services and complete related forms, participate in AIA Component events, or communicate with our administration department (“Personal Data”).

Please note, this Privacy Notice does not cover the individual privacy practices of the websites of The American Institute of Architects, the national organization headquartered in Washington, DC, (“AIA National”) which is a separate legal entity (to understand how AIA National uses personal information, please contact them directly). This privacy notice does not cover the individual privacy practices of individual chapter websites, specifically those of: AIA United Kingdom, AIA Continental Europe, AIA Hong Kong, AIA Japan, AIA Middle East, AIA, Shanghai and AIA Canada.

AIA COMPONENT is committed to handling Personal data in compliance with applicable data protection laws, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (known as “General Data Protection Regulation”, or “GDPR”).

Please note that if you disagree with anything in this Privacy Notice, you must not use the Websites or mobile applications, or provide personal information to use in connection with this Region. As further set below, by subscribing to our services as a member or non-member you consent to the data handling practices described in this Privacy Policy.

In this Policy, in instances where the AIA Component and AIA National are referenced collectively, they shall be referred the “AIA.”

### **HOW TO CONTACT AIA International Region**

We are headquartered at 1735 New York Avenue, NW Washington DC 20006-5292, United States. You may contact our Chapter if you have any questions or concerns about our policies or practices regarding Personal Data by contacting: [info@aiainternational.org](mailto:info@aiainternational.org).

### **DEFINITIONS**

As used in this Policy:

“Personal Data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identify of that natural person.

“Cookie(s)” means a small piece of software that may be placed on a visitor’s machine during the use of our Websites.

“Data subjects” refers to AIA COMPONENT members, Website visitors, Suppliers, Events participants, Events sponsors, Events speakers, Employees, Business contacts and other people we have a relationship with or may need to contact.

### **WHICH PERSONAL DATA DO WE COLLECT?**

Your privacy is important to us. We adhere to all applicable privacy laws and regulations affecting your data and strive to adopt best practices when it comes to your privacy.

AIA COMPONENT may collect the following categories of Personal Data to the extent necessary to achieve the purposes outlined in this Policy:

- Identification data, such as first name, name, pictures, IP address, cookies, photographs;
- Contact data, such as email address, telephone number, postal address;
- Other data that you have provided while contacting us, especially using the Contact us or signup forms on our Website;Cookies.

For marketing purposes and to improve our Websites and services, we also collect data sent through surveys.

In some circumstances, we also collect and process special categories of data, such as Menu choices.

### **HOW YOUR INFORMATION IS USED AND ON WHAT BASIS**

*We communicate with our members and customers electronically and through bulk mail advertisements. All electronic communications adhere to the CAN SPAM Act and EU Privacy Policy (GDPR).*

Your data is used according to your relationship to us. A description of the different relationship types is below.

We process your Personal Data only if you have granted express consent for its stated purposes.

AIA COMPONENT also has a legitimate interest in the processing of personal data to the extent strictly necessary for the purposes of ensuring network and information security.

AIA COMPONENT processes Personal Data for the following purposes as well:

- For general membership administration: AIA COMPONENT has legitimate interest in the processing of Personal Data for the purpose of administering the membership and collecting membership fees.
- For contract management purposes: AIA COMPONENT has legitimate interest in the processing of Personal Data of representatives and contact persons of entities and associations which AIA COMPONENT contracts (e.g. with respect to services agreements, consultancy agreements, sponsorship agreements, funding agreements).
- For marketing purposes: AIA COMPONENT processes Personal Data from individuals who register themselves on the Website and give their express consent to receive updates from AIA COMPONENT. You may revoke your consent to being contacted by email for promotional purposes any time, by clicking on an unsubscribe link in the footer of the AIA COMPONENT email alerts or replying directly stating your wish to unsubscribe. AIA COMPONENT updates may include the following: newsletters, information about future events or AIA COMPONENT.
- Further, we use a third-party supplier (Mailchimp or another similar service we may engage in the future) to enable email tracking technology to obtain data on if you open an email or if you click on links in an email. This data will be used to help improve future marketing messaging and/or to prioritise follow-ups based on perceived communications relevance. Learn more from their Privacy Policy.

Without your consent, we will not make use of Personal Data unique to you, such as your IP address, your device and browser information, or the time and number of times you open an email or click on a link. You can update at any time your preferences in the footer of the email alerts you may receive from us.

- For business purposes: If you are a member of AIA COMPONENT, we process your Personal Data, such as name, email address, phone number, position/company and company address, only with your consent, to create the AIA COMPONENT annual and monthly newsletter. This publication is shared across the AIA COMPONENT network for the purposes of generating business referrals across the AIA COMPONENT network and keeping our members connected.
- For organising seminars and conferences: AIA COMPONENT processes Personal Data from individuals who register online to participate to seminars and conferences organised by AIA COMPONENT for the purpose of managing the registration and participation to such events based on the necessity for AIA COMPONENT to meet its obligations as organiser of the events under the general terms and conditions that are expressly accepted by the individuals and/or based on consent for certain Personal Data.

We also use third party suppliers and vendors, such as hotels, catering services to meet our obligations as organiser of the events under the general terms and conditions that are expressly accepted by the individuals and/or based on consent for certain Personal Data.

- For website administration purposes: When you visit our website, our system automatically collects information about your visit, such as your browser type, your IP address and the referring website. See below for descriptions about the Cookies used on our Websites and the Privacy Policy of our third party supplier "Squarespace" (<https://www.squarespace.com/privacy>).

We have strategic partners who have access to membership lists for promotional mailings. Email addresses, telephone numbers, and other demographic data are not made available to our advantage partners. These partners are bound by GDPR to respect your privacy.

## **SHARING PERSONAL DATA**

In addition to the sharing through usages described above, we engage third parties, such as hosting companies, security auditors, or analytics providers, to support us in activities relating to hosting and operating our Websites, marketing, analytics, improving the Websites and other platforms, and sending email newsletters.

These processors may be located outside the European Union in which case We ensure that these processors provide appropriate safeguards.

We generally require such vendors to agree to maintain the confidentiality of all of our confidential and/or proprietary business information, including your Personal Data, and to use such information solely for the purpose of providing Services to us.

We may disclose your Personal Data if required by law, regulation, or other legal subpoena or warrant. We may also disclose your Personal Data to a regulatory or law enforcement agency if we believe it to be necessary to protect the rights, property, or personal safety of AIA COMPONENT, its members or any third party.

The above will be done with your informed consent and with adequate protective measures in place.

## **RETENTION PERIOD**

AIA COMPONENT will only keep Personal Data for the time that is strictly necessary to achieve the purpose(s) for which they were collected, e.g. for the duration of a contractual relationship or of a project/event, and for a period of time thereafter if so required by applicable law or if in the primary interests of the Data subjects.

## **COMMITMENT TO DATA SECURITY**

*AIA COMPONENT is committed to protect all Personal Data it processes. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have implemented reasonable appropriate physical, and electronic procedures to safeguard and secure the information we collect online and by paper. For Website security purposes and to ensure that this service remains available to all users, our computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals evidence of possible abuse or criminal activity, such evidence may be provided to appropriate law enforcement officials.*

Our employees are provided with context-specific access to our systems and servers and your Personal Data are subject to contractual obligations to access and use your Personal Data only as required to deliver Services to you.

*Please do not send us sensitive information, such as your credit card or social security numbers, via e-mail. It is possible that during transmission of your e-mail this information may be intercepted by a third party. We cannot guarantee its safety while in transit.*

## **WEB BROWSING PRACTICES**

### **Cookies**

*As is common practice with almost all professional websites, our Websites use Cookies. This page describes what information they gather, how we use it and why we sometimes need to store these Cookies. We will also share how you can prevent these Cookies from being stored however this may downgrade or 'break' certain elements of the Websites functionality.*

*You can prevent the setting of Cookies by adjusting the settings on your browser (see your browser Help for how to do this and our Website). Please, also see the Cookies policy of our service provider (Squarespace Learn more from their Privacy Policy <https://www.squarespace.com/privacy>).*

*The Cookies We Use:*

- **Email related Cookies:** *Our site offers email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.*
- **Forms related Cookies:** *When you submit data to us through a form, such as those found on contact pages or comment forms, Cookies may be set to remember your user details for future correspondence.*
- **Analytics cookies:** *Our site uses certain third-party cookies, such as Google Analytics, Google Tag Manager, and Google Adwords. These are trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These Cookies may track things such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.*

### **External Links Disclaimer**

*We provide links from our Website pages to external web sites because they provide information that may interest our members. This is provided as a convenience only. External*

*links do not constitute an endorsement by us of the opinions, products, or services presented on the external site, or of any sites linked to it. We are not responsible for the legality or accuracy of information on externally linked sites which may contain separate privacy policies and data processing disclosures, or for any costs incurred while using externally linked sites.*

### **Social Networking Sites and Applications**

*It is important to note that we also link to other third-party sites and applications (e.g., LinkedIn, Facebook, Twitter, YouTube, Instagram). These sites and applications may not follow the same privacy policies as we do. For instance, these sites and applications may use cookies, collect data, and use the data in ways that we would not. We are not responsible for the privacy practices on these other sites. Please refer to the privacy policy of these sites.*

## **CHILDREN'S PRIVACY**

*Our Websites are not directed to children under the age of 15, if you are not 15 years or older, do not use our Website. We do not knowingly collect Personal Data from children under the age of 15. If we learn that Personal Data of persons less than 15 years-of-age has been collected through our Website, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 15 has posted, submitted or otherwise communicated Personal Data to our Website without your consent, please contact us at : [info@aiaeurope.org](mailto:info@aiaeurope.org) so that we may take appropriate action to remove the minor's Personal Data from our systems.*

## **DATA SUBJECTS' RIGHTS**

**Your Rights.** *Subject to applicable law, you have the following rights in relation to your Personal Data:*

**Right of access:** *If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.*

**Right to rectification:** *If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data 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 Personal Data so that you can contact them directly.*

**Right to erasure:** *You may ask us to delete or remove your Personal Data 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 Personal Data so that you can contact them directly.*

**Right to restrict processing:** *You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data 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 Personal Data so that you can contact them directly.*

**Right to data portability:** *You have the right to obtain your Personal Data from us in a structured, commonly used and machine-readable format. You may transmit those data to another controller.*

**Right to object:** You may ask us at any time to stop processing part or all of your Personal Data, and, when legally allowed, we will do so:

If we are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or

If we are processing your Personal Data for direct marketing.

**Right to withdraw consent:** If we rely on your consent to process your Personal Data, 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 Personal Data, you can report it to a supervisory authority in EU. We ask that you please attempt to resolve any issues with us first although you have a right to contact your supervisory authority at any time.

**Post-mortem right to privacy:** you have the right to give us instructions concerning the use and disclosure of your Personal data after your death.

You may exercise your rights by contacting us as indicated under “How to Contact Us” section.

If you wish to exercise any of these rights or if you are not satisfied about how we protect your privacy, you should address your request by email together with a copy of your ID (which we will only use to verify your identity), to AIA COMPONENT, as data controller at the following address: [info@aiainternational.org](mailto:info@aiainternational.org).

AIA COMPONENT will aim at responding to data subject requests without undue delay and in any event within 1 month of receipt of the request unless it is particularly complicated or you have made several requests in which case we aim to respond within three months. We will let you know if we are going to take longer than one month.

## **MODIFICATIONS TO THIS PRIVACY NOTICE**

If we make any material changes to this Notice or the way we use, share or collect personal data, we will notify you by revising the “Last Updated” at the top of this Notice, prominently posting an announcement of the changes on our site, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to this Notice in the future will be posted on this page and, where appropriate, notification sent to you by e-mail. Please check back frequently to see any updates or changes to this Notice.

## **COMPLAINTS**

If you have a complaint or concern about how we use your Personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time.

Any dispute over privacy or the terms contained in this Privacy Policy will be governed by ~~French law~~ EU law.