

# **Communications Privacy Notice**

Last updated: 20 July, 2018

This document relates to personally-identifiable data collected and processed on behalf of <u>EDHEC-Risk</u> <u>Institute</u>, part of EDHEC Business School, for the purpose of electronic communications, postal communications and telephone contact.

#### 1. Data Sources

The personally-identifiable data comes from the following sources:

- Website subscribers.
- Event participants.
- Survey participants.
- Subscribers to e-mailing campaigns.
- Stakeholders and clients.
- Data subjects identified as having a professional role in relation to the activities undertaken.

#### 2. Data Usage

The personally-identifiable data is used for the following purposes:

- Providing the data subject with information on financial research (including but not limited to quarterly newsletters; publications such as research papers, articles, supplements, reports and surveys; press releases).
- Providing the data subject with information on related events (including but not limited to seminars; conferences; masterclasses; webinars).
- Providing the data subject with information on related activities.

Personally-identifiable data is not used for the purpose of automated decision-making.

## 3. Personally-Identifiable Data Fields

The personally-identifiable data that is processed is as follows:

- Title.
- First name.
- Last name.
- Company.
- Position.
- Professional postal address.
- Professional electronic address.
- Professional telephone number.

Personally-identifiable data is conserved for as long as it is reasonably necessary in the execution of the activities.

Personally-identifiable information is not transferred outside of the European Economic Area.

#### 4. Legitimate Interests for Processing Personally-Identifiable Data

The legitimate interests pursued for the processing of personally-identifiable data are to:

 Provide financial professionals with research, products and education on the latest advances in the area of retirement investment solutions.

#### 5. Use of Tracking Mechanisms

An invisible single-pixel image is used to obtain general statistical information on whether an electronic message has been opened and read, together with the geographical location. This data is used to improve the content provided to the data subject.

#### 6. Review and Correction of Personally-Identifiable Data

The data subject may review, update and correct their personally-identifiable information by contacting <a href="mailto:datamanagement@edhec-risk.com">datamanagement@edhec-risk.com</a>. Upon request, they will be informed in writing of which personally-identifiable data is stored.

### 7. Unsubscribing and Data Removal

- At any time, the data subject may unsubscribe to all communications by contacting <u>datamanagement@edhec-risk.com</u>. All electronic communications also include an opt-out option in the footer of the message.
- The data subject may request the deletion of their personally-identifiable information by e-mail to <a href="mailto:datamanagement@edhec-risk.com">datamanagement@edhec-risk.com</a> or by postal mail to EDHEC-Risk Institute, 393-400 Promenade des Anglais, BP 3116, 06202 Nice Cedex 3, France.
- Such requests will generally be processed within two working days.

#### 8. Disclosure

Personally-identifiable data will not be sold, rented, leased, forwarded or shared in any way with third parties.

## 9. Security

Appropriate technical and organisational measures have been implemented, such as limiting access to the data to authorised personnel only and storing data on a secure server, to protect personally-identifiable information against accidental or intentional manipulation, loss, destruction and access by unauthorised persons. The security procedures are continually enhanced as new technology becomes available.

#### 10. Data Protection Officer

The nominated Data Protection Officer correspondent is:

Damien Najean
Direction du Business Development (DBD)
EDHEC Business School
393-400 Promenade des Anglais
BP 3116
06202 Nice Cedex 3
France

E-mail: damien.najean@edhec.edu.

## 11. Regulator

In the event of any data-related concerns, the data subject may contact their regional data privacy regulator.