

SIF's Privacy and Data Protection Policy

Introduction

The Sustainable Infrastructure Foundation (SIF) is committed to safeguarding the privacy of the users of SIF's public website (the "Website") and SOURCE. SIF do not knowingly attempt to solicit or receive information from children. Similarly, SIF do not intend to collect any sensitive data such as data relating to the User's health, religion, ethnic background or political views.

This Privacy and Data Protection Policy describes SIF's policies and practices regarding its collection and use of the User's Personal Data and sets forth the User's privacy rights.

By accessing or using the Website or SOURCE, the User agrees to the terms and conditions contained in this Privacy and Data Protection Policy, the applicable Terms of Use as well as the Special Conditions the User may have entered into with SIF.

This Privacy and Data Protection Policy applies to any information collected by SIF through the access to or use of the Website or SOURCE by the User.

Definitions

"Personal Data or Information" means all information relating to an identified or identifiable person. Personal Data does not include publicly available information that has not been combined with non-public Personal Data, nor does it include information that has been anonymized.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Data Controller" means SIF, the foundation responsible for the use of and processing of the User's Personal Data.

"Data Processor" means a natural or legal person which processes personal data on behalf of the controller.

Data Protection Officer

SIF is headquartered in Geneva, Switzerland. SIF has appointed an external data protection officer for the User to contact for any questions or concerns about SIF's personal data policies or practices. SIF's data protection officer's name and contact information are as follows:

Mr. Dan FUOCHI, atty.
Rue Sautter 29
1205 Geneva

legal@sif-source.org
+41 (22) 789 35 10

Collection and Use (process) of the User's Personal Information by SIF

SOURCE's registration process and use

As part of SOURCE's registration process, SIF collects information about the User including but not limited to the User's name, personal and/or work address, phone number, job title, company name and address. SIF may also collect information related to the use of SOURCE, including but not limited to visitor's IP address, operating system, browser software, date, time and visited pages, including through the use of cookies.

Trainings

If the User participates in SIF training, the User may sign up directly through SIF in which case the User's name and contact information will be directly collected from the User. The User may, alternatively, sign up for training – or be signed up for training – by or through a third party such as one of SIF's training partners, or the User's own employer.

SIF may also use independent contractors to conduct the training and third parties to provide the training venue. The User Personal Information will be stored in SIF's database (hosted by cloud service provider) and may also be shared with SIF's training partners, trainers, and/or the venue hosting the event. SIF's training partners, trainers, and training venue hosts have agreed not to share the User's Information with others and not to use the User's Personal Information other than to provide the User with SIF's services.

Correspondence with SIF

If the User corresponds with SIF by email, the postal service, or other form of communication, SIF may retain such correspondence and the information contained in it and use it to respond to the User's inquiry; to notify the User of SIF's activities or services; or to keep a record of the User's complaint, accommodation request, and the like.

If the User wishes to have SIF "erase" the User's Personal Information or otherwise refrain from communicating with the User, the User may contact SIF's Data Protection Officer at legal@sif-source.org. SIF may nevertheless retain a copy of the User's email address to ensure that SIF do not communicate with the User if the User has asked SIF not to.

Use of SIF's public Website

SIF's Website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where the User's computer or device is accessing the internet, browser type, operating

system and other usage information about the use of the Website, including a history of the viewed pages.

SIF uses this information to help design the Website to better suit its users' needs. The User's IP address may also be used to help diagnose problems with the server and to administer the Website, analyze trends, track visitor movements, and gather broad demographic information that assists SIF in identifying visitor preferences. SIF's website also uses cookies.

SIF has a legitimate interest in understanding how Users and visitors use its Website. This assists SIF with providing more relevant services, with communicating value to stakeholders, and with providing appropriate staffing to meet Users' needs.

Cookies

The Website and SOURCE use cookies, which are text files placed on the User's computer.

The Website uses cookies to provide enhanced functionality and aggregate traffic data. These cookies are delivered in a first-party context. The Website also captures limited information (user-agent, HTTP referrer, last URL requested by the user, client-side and server-side clickstream) about visits to the Website; SIF may use this information to analyze general traffic patterns and to perform routine system maintenance. The User have many choices with regards to the management of cookies on the computer. All major browsers allow the User to block or delete cookies from the User's system. To learn more about the ability to manage cookies, the User may consult the privacy features in the browser.

SOURCE only uses required cookies to enable the platform functionality.

Google Analytics

The Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the Website analyze how users use the site. The information generated by the cookie about the use of the Website (including the User's IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating the use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate the User's IP address with any other data held by Google. The User may refuse the use of cookies by selecting the appropriate settings on the User's browser, however by doing so, the User may not be able to use the full functionality of this Website. By using the Website, the User consents to the processing of data about the User by Google in the manner and for the purposes set out above. More information can be found at this address: <https://support.google.com/analytics/answer/6004245>.

Links

SIF's public Website or SOURCE may offer links other organizations' websites. At these times, the User will be leaving the Website or SOURCE. SIF is not responsible or liable for content provided by these third-party websites or their privacy practices or policies.

Personal Information obtained from third parties

From time to time, SIF receives personal information about individuals from third parties. This may happen if the User's employer signs up the User for training.

SIF as Data Processor

In the event where the processing of Personal Data of third parties is assigned to SIF by the User, the latter guarantees that it has the right to lawfully process such data. The User is solely responsible for data accuracy.

The User further represents that the User has implemented privacy and security practices consistent with this Privacy and Data Protection Policy. If the User submits Personal Data of third parties, the User has informed such third parties about the processing of their Personal Data and their rights according to the applicable data protection regulation.

Purposes for processing the User's Personal Data

Personal Data collected by SIF is processed only for the purposes set out in this Privacy and Data Protection Policy. It is not used or disclosed for any other purpose without consent or as authorized or required by law.

SIF processes the User's data to provide the User with the services the User has requested or purchased from SIF, including the access to and use of the Website and/or SOURCE.

More specifically, SIF uses the collected information for the following general purposes:

- General corporate operations and due diligence, including, but not limited to the monitoring of the User's activities to help SIF better understand the Users' needs and interests to better tailor SIF's services to meet the Users' needs;
- Product development and enhancement, such as optimization of the Website and SOURCE and its operating environment;
- Communication, marketing and intelligence, including, but not limited to, information to the User relating to the use and content of the Website and SOURCE;
- Statistical analysis;
- Fraud detection and prevention of abuses;
- Legal compliance, including, but not limited to, compliance with the terms and conditions of the applicable Terms of Use;
- Dispute resolution.

Sharing of Personal Information with others

SIF may share the User's Personal Data with its affiliates, subcontractors, and third-party providers only for the purposes stated in this Policy. The User's Personal Data is treated by SIF, its affiliates, subcontractors and third-party providers as strictly confidential and is neither passed nor sold to other third parties.

The User's Personal Data can be stored through electronic systems located in various jurisdictions. In that event, SIF ensures that an adequate level of protection is guaranteed.

SIF may disclose the User's information to governmental agencies or entities, regulatory authorities, or other persons as it deems necessary to satisfy any applicable law, regulations, court order or governmental request, or similar processes as either required or permitted by applicable law.

Security of Information

SIF has implemented adequate technical and organizational measures to protect the User's collected data against unauthorized access and processing, misuse, alteration, falsification, loss or destruction.

SIF restricts access to the User Personal Data to those employees or consultants who need to know that information and are bound by legal or contractual confidentiality obligations.

Data Subject's Rights

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects.

The User may also request information about: the purpose of the processing; the categories of Personal Data concerned; who else outside SIF might have received the data from SIF; what the source of the information was; and how long it will be stored.

The User has a right to correct (rectify) the record of the User's Personal Data maintained by SIF if it is inaccurate. The User may request SIF to erase that data or cease processing it, subject to certain exceptions. The User may also request SIF to cease using the User's data for direct marketing purposes.

When technically feasible, SIF will—at the User's request—provide your personal data to you or transmit it directly to another controller.

For more information on the User's rights of erasure and portability, please contact SIF's Data Protection Officer at legal@sif-source.org.

The User have a right to lodge a complaint with the appropriate data protection authority if SIF processes of the User's Personal Data raises concerns.

Reasonable access to the User's Personal Data will be provided to the User upon request made to SIF's Data Protection Officer at legal@sif-source.org. If access cannot be provided within a reasonable time frame, SIF will provide the User with a date when the information will be provided. If for some reason access is denied, SIF will provide an explanation as to why access has been denied.

Data storage and retention

The User Personal Data is stored by SIF on the servers of the cloud-based database management services SIF engages, located in Switzerland.

SIF retains data for the duration of the User business relationship with SIF.

For more information on where and how long the User's Personal Data is stored, please contact SIF's Data Protection Officer at legal@sif-source.org.

Changes and Updates to the Privacy and Data Protection Policy

Information privacy is an ongoing responsibility. SIF will from time to time update this Privacy and Data Protection Policy as SIF undertakes new personal data practices or adopt new privacy policies.

As the services provided by SIF evolve, this Privacy and Data Protection Policy is expected to change as well. SIF reserves the right to amend this Privacy and Data Protection Policy at any time, for any reason, without prior notice. The updated Policy will be effective immediately upon providing the User with notice of the modification. The provisions contained herein supersede all previous privacy notices or statements regarding our privacy practice.

Questions, Concerns or complaints

Any questions, complaints or objections regarding the treatment of Personal Data by SIF should be directed to SIF's Data Protection Officer (legal@sif-source.org).

The User may object to the processing of its Personal Data for the purpose of direct marketing by sending an email to legal@sif-source.org.

This Privacy and Data Protection Policy is effective as of May 2018.