



September 2018

## PRIVACY POLICY

European Precious Metals Federation (“**EPMF**” and/or “**we**”, “**us**”, “**our**”) is committed to protecting and respecting your privacy.

This Privacy Policy (“**Privacy Policy**”) describes the types of personal information we collect via our website [www.epmf.be] including the Portal (the “**Site**”), how we use the information, with whom we share it, how you can exercise your rights on your personal data and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. You have the right to contact us to object to, or make certain requests in relation to, the processing of your personal data (as explained further in the **Your Rights** section of this Privacy Policy).

Your use of the Site is also expressly subject to our Terms of Use. This Privacy Policy is incorporated by this reference into the Terms of Use, available [here](#).

By accessing and/or using the Site, you agree that your personal data may be collected and processed under the terms and conditions set out below. If you do not accept this Privacy Policy, you must cease all use of the Site. We encourage you to periodically review this Privacy Policy to keep up to date on how we are handling your personal data.

We, EPMF, located avenue de Broqueville, 12, 1150 Brussels are the “**Data Controller**” i.e. the legal entity which determines why and how your personal data is processed, of the personal information collected via the Site.

### INFORMATION WE COLLECT FROM YOU

We may collect personal information (within the meaning of applicable data protection law) about you (“**Your Data**”) in the following ways:

**Information you give us.** This is information that you give us by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes when you register to use the Portal via our Site, or when you contact us. The information may include without limitation your name, address, e-mail address, phone number or other contact details.

While we make every effort to ensure that Your Data is accurate, complete and up to date, you can help us considerably in this by promptly notifying us if there are any changes to Your Data (please see the **How to Contact Us** section below).

**Information we collect about you.** We and our service providers may collect certain information by using automated means when you interact with our Site. This information may include your IP address, browser type, operating system, the full URLs, referring URLs and information on actions taken or interaction with our Site.



We may use third-party web analytics services on our Site, to help us analyse how visitors use our Site.

We and our service providers may also collect information about your activities on our Site for use in providing you with content tailored to your individual interests.

**COOKIES**

**Cookies we use.** Like many websites, we use a technology called "cookies". Cookies are small text files that are placed on your computer or other electronic device you may use to access the Site. Cookies can collect information about your access and use of the Site through logging your activity on our Site. The law requires us to provide you with certain information regarding cookies.

We use cookies to improve the use and functionality of our Site and to enhance your experience when using it. Your web browser stores cookies on your device hard drive for record-keeping purposes (e.g. logging in) and sometimes to track information. Analytics cookies are used to monitor statistics of our Site's traffic and to help us measure and review the effectiveness of our interactive online content, its characteristics, advertising and other communications. We do not use cookies to collect personal information such as your name; however, we may link information contained in a cookie to personal information you may provide us with other means (e.g. general website registration).

The following table describes the various cookies used on our Site:

Name of the cookie	Duration	Purpose of the cookie
bp_user-registered	13 months	These cookies are used by the website to determine which users should have access to private pages on the site e.g. white papers.
bp_ut_session		
bp_user_role		
_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat  (If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>).	1 minute	Used to throttle request rate.

**How to manage your cookies.** You can change the settings of your browser to block cookies systematically or based on their origin or to alert you when cookies are being sent to your device. The procedure for managing cookies and cookie preferences is different for each browser. You can check the steps for managing cookies in your particular browser's help menu:



For Internet Explorer™ : [windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies](http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies),

For Safari™ : [support.apple.com/kb/ht1677](http://support.apple.com/kb/ht1677),

For Chrome™ : [support.google.com/chrome/bin/answer.py](http://support.google.com/chrome/bin/answer.py),

For Firefox™ : [support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies](http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies),

For Opera™ : [help.opera.com/Windows/10.20/fr/cookies.html](http://help.opera.com/Windows/10.20/fr/cookies.html).

## USE OF YOUR DATA

We may use Your Data in the following ways:

- to provide you with access to the Portal and our other services via the Site (as applicable), this use of Your Data being necessary to provide you with our services in accordance with our Terms of Use and the present Privacy Policy;
- to contact you where necessary by post, telephone, email etc., this use of Your Data being necessary for the purposes of our legitimate interests and/or to provide you with our services in accordance with Terms of Use and the present Privacy Policy;
- to notify you about changes to the Portal or our other services, this use of Your Data being necessary for the purposes of our legitimate interests ;
- to operate, evaluate and improve our Site (including developing new products and services, troubleshooting, data analysis, testing and research and statistical and survey purposes); managing our communications; analysing our services, Site and any other digital assets; facilitating the functionality of our Site; and to ensure the content of our Site is presented in the most effective manner for you and for your computer, this use of Your Data being necessary for the purposes of our legitimate interests;
- as may be required by applicable laws and regulations or requested by any relevant judicial process or governmental agency;
- to comply with industry standards and our policies, this use of Your Data being necessary for the purposes of our legitimate interests.

## DISCLOSURE OF YOUR DATA

We may disclose Your Data to third parties:

- If we are under a duty to disclose or share Your Data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use, Internal Rules and other agreements; or to protect the rights, property, or safety of EPMF or of our members.

The security of Your Data is important to us. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All information you provide to us is stored on our secure servers. We use SSL encryption on our Site where necessary.



We store Your Data only for as long as it is necessary to fulfil the purpose for which it was collected, unless otherwise required or authorized by applicable data protection law. We take measures to destroy or permanently de-identify Your Data if required by law or if Your Data is no longer required for the purpose for which we collected it.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Data, we cannot guarantee the security of Your Data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **YOUR RIGHTS**

You have certain rights regarding the personal information we maintain about you. We also offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You can choose not to provide personal information to us. You also may refrain from submitting information directly to us. However, if you do not provide Your Data when requested, or if you exercise your rights you may not be able to benefit from all parts of the Site.

To the extent provided by applicable data protection law, you may withdraw any consent you previously provided to us, or object at any time to the processing of Your Data. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of Your Data will mean that you cannot use certain parts of our Site.

In addition you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you, update and correct inaccuracies in your personal information, object to the processing of your personal information, and have the information blocked, anonymized or deleted, as appropriate. The right to access personal information may be limited in some circumstances by applicable law. To exercise these rights, please contact [info@epmf.be](mailto:info@epmf.be).

You have the right to ask us not to process Your Data for marketing purposes. We will inform you (before collecting Your Data) and obtain your prior consent where required by applicable data protection law if we intend to use Your Data for such purposes or if we intend to disclose Your Data to any third party for such purposes. You can exercise your right to prevent such processing by advising us of your preferences before we collect Your Data, including on the form that is used to collect Your Data. You can also exercise the right at any time by contacting us at: [info@epmf.be](mailto:info@epmf.be)



Our Site may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws, so for example you should duly inform that individual on the processing of her/his personal data and obtain her/his consent, as may be necessary under applicable data protection laws.

You have the right to receive your personal data you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those personal data to another controller, where technically feasible.

In the event of a dispute regarding the processing of your personal data, you may submit your claim to the competent Data protection authority. In Belgium, this Data protection authority is the “Autorité de protection des données” (“APD”): [www.autoriteprotectiondonnees.be](http://www.autoriteprotectiondonnees.be).

#### **ACCESS TO INFORMATION**

You have the right to access information held about you. Any access request may be subject to a fee, where permitted under applicable data protection law. Any request should be made in writing, and the best way for you to do so is to contact us at the address stated below. As we must be able to identify the person making the request, and because a fee may be due, we request that you confirm any request made by you via different means by contacting us at the address stated below. Due to technological constraints and/or information security considerations, it may be inappropriate to use social media to supply information in response to any request by you for access to information, and so please provide an alternative delivery address for our response. We may reject requests where we are entitled to do so under applicable data protection laws, which may include where the request is manifestly unreasonable, in particular due to its repetitive or systematic nature, require disproportionate effort and/or risks the privacy or confidentiality of others.



## DATA SECURITY AND INTEGRITY

The security, integrity and confidentiality of Your Data are very important to us. We have implemented controls to protect Your Data from unauthorised access, modification, disclosure and misuse. We encrypt our data in transit and constantly review new technologies to protect Your Data. Please bear in mind that despite our best efforts to safe guard Your Data, no security measures are perfect or impenetrable.

## TRANSFERS OF YOUR DATA OUTSIDE THE EUROPEAN UNION

We may use the information collected on the Site (including Your Data) outside the European Union. We will hold and process your personal data in accordance with the applicable laws and regulations regarding these transfers. To this end, we will accomplish any appropriate formalities to authorize this transfer (either by obtaining your consent or by concluding a Data Transfer Agreement, Binding Corporate Rules, using the Privacy Shield certification, etc. as appropriate).

## HOW LONG DO WE KEEP YOUR DATA?

We will retain Your Data for the period necessary to fulfil the purposes described in this Privacy Policy and in accordance with our legal and regulatory obligations. We undertake to archive and delete your personal data as soon as the purpose of the collection is fulfilled and the data retention period has expired.

By virtue of the European General Data Protection Regulation n°2016/679, the retention of personal data relating to any user residing within a Member State of the European Union is summarized in the table below, which describes the maximum periods for which personal data of EU residents will be stored by us according to the purpose for which their personal data is collected and processed.

These maximum periods apply unless you have requested your personal data to be deleted or ceased being used before these expiration periods, subject to any mandatory legal requirement applicable to data retention.

Purpose	Data retention period
Measure traffic and personalize websites, mobile apps, managing cookies	13 months
Managing requests to access and rectify data	5 year from the receipt of the requests
Managing requests to oppose data processing	5 years from taking into account the opposition request
Sending information newsletters	3 years from the data collection or last user/member-initiated contact or membership to our association



#### **CHANGES TO OUR PRIVACY POLICY**

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

#### **HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy, our privacy practices or if you would like us to update information or preferences you provided to us, or to exercise your privacy rights, please e-mail us at: [info@epmf.be](mailto:info@epmf.be).