FIABCI

Privacy Policy

FIABCI Headquarters

Preamble

FIABCI is the French acronym for the International Real Estate Federation. Created in Paris in 1951, FIABCI is a worldwide business networking organization open to all professionals involved with the property industry.

FIABCI MISSION STATEMENT

The International Real Estate Federation aims to enable participants in the Real Estate Industry to improve the quality and competitiveness of their activities through the sharing of knowledge, information and business opportunities at a local, national and international level and to serve the following purposes:

- To defend on a worldwide level, the collective, moral, and professional interests of its members, and those of the groups which make it up.
- To allow participants in the real estate industry to improve the quality and the competitiveness of their activities through the sharing of knowledge, information and business opportunities at a local, national and international level;
- To provide direct access to international real estate contacts and business opportunities;
- To help improve the working relationship between the public and private sectors for the benefit of society;
- To facilitate the exchange of information on significant market, economic, corporate, governmental and technological conditions affecting the industry;
- To assist in cultural and educational exchanges among real estate professionals of different countries.

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1. Introduction

Protecting your privacy and the confidentiality of your information - over the Internet, on the telephone, or through our offices – has always been fundamental to the way we manage our activities at FIABCI. We operate on the basis of a Privacy Policy and related procedures that guide the handling of the personal information we collect. We have created this privacy statement in order to demonstrate our firm commitment to protecting the privacy of our members, partners and potential website visitors/users of FIABCI devices.

FIABCI is committed to protecting and respecting your rights to privacy and data protection and to complying with the provisions of all applicable data protection legislation and regulations.

1.1 Purpose and Scope

The purpose of our Privacy Policy is to explain how personal information relating to you ("Personal Data") will be handled by FIABCI and sets out how and why your Personal Data will be collected and processed by FIABCI and/or on its behalf by its third-party service providers in the context of your engagement with us. We shall also set out how you can contact us should you have any queries in relation to this Policy.

This Privacy Policy together with our Code of Ethics and Bye-Laws sets out how FIABCI collects, uses, shares and retains personally identifiable information. It will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of FIABCI and the services we provide.

1.2 Application and Changes

This Privacy Policy was last updated on 14 May 2018.
Please note that this Policy, while intended to be as complete and accurate as reasonably possible, is not exhaustive and may be updated from time to time.
Any changes we may make to our Privacy Policy in the future will be posted on the FIABCI Web site (www.fiabci.org) and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

1.3 Data Controller

The Data Controller for all personal data collected by us is FIABCI Headquarters (herein “the FIABCI HQ”) located at

CIT Tower Montparnasse
3 rue de l’Arrivée, 11th floor – 1109
Paris 75015, France

We are responsible for deciding what data we collect and how we hold, use your personal data. We have implemented appropriate data security measures for protecting the data from unauthorised access and loss.

2. Data Collection

We collect and maintain a variety of personally identifiable information but only when there is a legitimate business requirement, we are exercising official authority (as in the issuing and processing of export documentation) or when such information is provided on a voluntary basis.

When engaging with FIABCI, we will collect Personal Data:

- **from you**: for example, through the information you provide to us in applying to become FIABCI member, the Personal Data you supply via our website (www.fiabci.org), email, telephone, other devices or as a recipient of FIABCI Global News or through your engagement with us at FIABCI events by filling in forms on our websites. This includes information you provide when you enquire about or book on our events, trade missions or training courses; enquire about or use our export documentation services; enquire about membership benefits or join membership; enter a competition, promotion or survey; provide a case study, testimonial or media comment; request a magazine, report or newsletter; register to use or place an order on our website; participate in discussion boards or other social media functions or apply for a job/exchange program with us.
- **from third party sources**: including contact details from employers, software platforms we use for business processes, information from statutory and regulatory authorities and occasionally some additional sources.

2.1 What Personal Data do we process?

FIABCI will collect and process Personal Data including, where applicable:

- your name;
- your employer, your job title and/or position;
- your personal description and photograph;
- your specialization, business activities and your areas of interest;
- your contact details, including your address (postal and email) and phone number;
- documentation confirming your identity, such as your passport/registration certificate;
- financial information, including information necessary to make or receive payments to and from you and for the purposes of fraud prevention;
- details of your attendance at our events, photos and your social media profile and posts;
- details of your visits to FIABCI HQ and your correspondence, communications and connections with our staff;
- publicly available information;
- any information which is provided to us by you or on your behalf;
- information about your visits to our website(s) such as the domain and host from which you access the Internet, the Internet protocol (IP) address of the computer you are using; the browser software you use; your operating system and the date and time you access the website;
- information relating to your subscription to, receipt of or interest in any of our mailing lists or newsletters; and
- any other information we may ask for which is relevant to your enquiry or request for information or services.

2.2 How and why do we process personal data?

FIABCI is a membership organisation connecting and supporting its members and the wider business community and influencing the environment in which business operates. To deliver our legitimate business interests, we must maintain contact information on our members and the wider business community.

The following table details the legal basis for (the "**Legal Basis**") and the reasons why ("**Purposes**") we process your Personal Data:

NECESSARY FOR ENTERING INTO OR PERFORMANCE OF AN AGREEMENT	
Legal Basis	It is necessary to process your Personal Data to enter into and perform our agreement with you as a member/partner of FIABCI or perform our agreement with you for our international or consular services.
Purposes	We obtain, collect and process your Personal Data: ***Entering Into and Performing our Agreement with you as a Member/ Partner of FIABCI:*** • to determine, perform and execute the terms on which you will engage with us; • to ensure the smooth running of your membership (including all of the activities that need to be undertaken before, during and after your FIABCI membership/partnership); • to add you and your contact details to our Membership Directory as part of your FIABCI membership/partnership; • to arrange, administer and send you information about FIABCI elections; • to process payment of membership/partnership fees; and • to administer requests or procedures requested by you throughout your FIABCI membership/partnership (e.g. event bookings). ***FIABCI Membership Directory:*** For the purpose of managing and maintaining the FIABCI Membership Directory and in particular: • to add you as a Member/Partner/Medal Holder/Officer/Staff to the Membership Directory; • to update your contact details on the Membership Directory as necessary; • to provide you access to our Membership Directory both online and in hardcopy; • to assist in facilitating meetings and introductions through the Membership Directory; and • to process your queries in respect of the Membership Directory. ***FIABCI events:*** • to inform you of our events programme; • to monitor your attendance at FIABCI events; • to add you to our attendee lists for FIABCI events; • to notify other FIABCI members/partners as well as other participants of your proposed attendance at events;

	• to book an event; • to process your payment for featured events e.g. Prix d'Excellence Dinner, Farewell Gala Dinner, MIPIM Gala Dinner, Business Lunches and Missions, Social Events, FIABIC World Congress, FIABCI Regional Congress, FIABCI December Business Meetings, other administrative meetings, trade missions; and • to confirm your event booking and send you information regarding the event.
IMPORTANT	You are obliged to provide us with your Personal Data as it is necessary to enter into an agreement with us as a FIABCI Member/Partner or as attendee of our events.
LEGITIMATE INTERESTS	
Legal Basis	We may obtain, collect and process your Personal Data where we have a legitimate interest to do so part of your engagement with us a FIABCI Member/Partner or as attendee of our events.
Purposes	We obtain, collect and process your Personal Data: ***FIABCI Membership Development*** • to grow membership numbers; • to improve member engagement and facilitate business opportunities between members; • to share contact information and arrange introductions between members; • to share information regarding your business and business interests with other members; • to provide FIABCI members with annual membership reports; • to provide and process member/partner satisfaction surveys, policy surveys and referral forms; • to process and communicate with you regarding renewing your FIABCI membership/partnership; and • to process and communicate with you when you end your FIABCI membership. ***Marketing, News & Events Communications*** • to provide you with information in relation to our events programme, global news from FIABCI and other communications from FIABCI deemed to be of probable interest. ***Facilitate FIABCI Events*** • to add you to our attendee lists for FIABCI and its Partners events; • to notify other FIABCI Members/Partners as well as other participants of your attendance at FIABCI events; and • to obtain information about your dietary and other specific requirements for FIABCI events. ***Promote FIABCI***

	For the purposes of promoting FIABCI, its activities and events including: • to photograph and video-record members at FIABCI events; • to share photographs and recordings of FIABCI events on social media, FIABCI website, FIABCI Global News; and • to produce FIABCI promotional material (Brochures, Flyers, etc.). ***Responding to Queries*** • to process and respond to any enquiries, requests and complaints you may submit to us via our website, e-mail or phone. ***Improving Website/Apps Functionality & Efficiency*** • to provide, improve, test and monitor the effectiveness of the FIABCI Website/Apps; • to monitor metrics such as total number of visitors, traffic data and demographic patterns; and • to ensure the content on the Website/Apps is presented in the most effective manner for you and to enhance your use of the Site and Applications. ***Improving FIABCI services*** • to better our services offering through online surveys and focus groups; and • to survey members in order to gain an insight into business trends and shape our services.
IMPORTANT	Networking is a cornerstone of FIABCI and your personal contact details are found in our Membership Directory, enabling other businesses in membership to connect with you and for you to contact other members, partners as well as other participants of FIABCI events. Before we process your Personal Data to pursue our legitimate interests for the above purposes, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms. **Please note you have right to object to the processing of your personal data for direct marketing. (See Section 3.3)**
NECESSARY FOR COMPLIANCE WITH LEGAL OBLIGATION	
Legal Basis	Sometimes it is necessary for us to process your Personal Data in order to comply with our legal obligations.
Purposes	We obtain, collect and process your Personal Data: ***FIABCI Reporting:***

	• To comply with our legal obligations under French and European law in respect of issuing and certifying documents for legal reports.
IMPORTANT	FIABCI is obliged by French and European law to process your Personal Data in the delivery of Legal, Tax and Administrative Reports.

3. Disclosure of Your Information

As a networking organisation, we may share or disclose some or all of the Personal Data we collect from and obtain about you to the third parties.

We may transfer your Personal Data outside the European Economic Area ("EEA"). Certain Recipients (our third-party service providers) who process your Personal Data on our behalf may transfer your Personal Data outside the EEA to a country that does not provide an adequate level of protection to your Personal Data. Where such transfers occur, it is our policy that: a) they do not occur without our prior written authority; and b) that an appropriate transfer agreement is put in place to protect your Personal Data.

3.1 Who is your data shared with?

We may share your information with selected third parties including:

- Other FIABCI members;
- Internal teams within FIABCI HQ;
- IT & website service providers, marketing companies, PR agencies and printers;
- Third parties involved in hosting or organising events;
- Regulatory authorities (e.g. enforcement agencies and public bodies);
- Professional advisors such as tax or legal advisors, consultants and accountants;
- Business partners, suppliers and sub-contractors, including, but not limited to our professional advisors for the performance of any contract we enter into with them or you, or in relation to any ancillary requirements;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

3.2 Who is your data disclosed to?

We may disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our agreements; or to protect the rights property, or safety of FIABCI, our members or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- for marketing purposes if you have given your consent.

3.3 Opt-Out

In addition to providing members and the wider business community with information about our services and activities, from time to time, we collaborate with relevant organisations and companies to promote programmes that may be of interest to them and us. In such cases, we do not provide these organisations with any personally identifiable information, but may distribute the organisation's information on their behalf to those who may legitimately be benefited from receiving such information or have elected to receive such information.

If you do not wish to receive marketing material, you may opt out. Every marketing email will include an "unsubscribe" link at the bottom. You may also notify FIABCI HQ in writing (see below).

If your parent organization has nominated you as a relevant contact required to receive information on its behalf, you cannot opt out of important information FIABCI is required to provide to you as per FIABCI contractual obligations to its members. If our processing of personal data is based on your consent, you have the right to withdraw consent for future processing at any time. Please note, however, that we may still be entitled to process your personal data if we have another lawful basis for doing so.

If you wish to opt out of any marketing we send you, please contact

- By email at fiabcihq@fiabci.org
- By telephone on +33 (0) 1 45 38 26 36 Monday to Friday (except public/bank holidays) between 10.00am and 6.00pm (CET); or
- By post at Unsubscribe, FIABCI HQ, 3 rue de l'Arrivée, Paris 75015, France

3.4 Links to third party sites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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.

3.5 Social media

We may use third party provided tools to manage our social media interactions. If you send us a private or direct message via social media the message may be stored on such a tool, but like other personal data, these direct messages will not be shared with any other organisations.

4. Data Minimisation and Retention

The personal data collected is stored FIABCI's Customer Relationship Management (CRM) system and other appropriate data management systems, both paper based and electronic.

Your Personal Data will be retained for as long as you remain a FIABCI active or inactive member/partner. Once we have determined that we no longer need to hold your Personal Data, we will delete it from our systems.

We only collect the minimum amount of personal information necessary. At regular intervals we will:

- Review the length of time we keep your personal data;
- Consider the purpose or purposes for which we hold your personal data in deciding whether (and for how long) to retain it;
- Securely delete personal data that is no longer needed for that purpose or those purposes;
- Update, archive or securely delete personal data if it goes out of date.

5. Data Security and Protection

We want to give you the confidence that your Personal Data is secure. FIABCI has a series of policies and procedures in place to ensure your Personal Data is safe.

We use reasonable measures - which are appropriate to the type of information and compliant with relevant legislation - to safeguard the confidentiality, integrity and availability of personally identifiable information. Technical and organisational measures are in place to prevent your personal data from

being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to only those employees, contractors or agents who have a legitimate business need to have access to that data. They are subject to a duty of confidentiality and due care with respect to handling the personal data.

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

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Our employees are trained on data security and information protection.

Relevant areas of FIABCI's website will employ Secure Socket Layer (SSL) or Transport Layer Security (TLS) encryption technology to enhance data privacy and help prevent loss, misuse or alteration of the information collected and retained by us.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

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 website; 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.

6. Privacy Rights and Responsibilities

6.1 What rights do you have?

Under the GDPR, you have a number of rights such as:

- **Right of Access:** You have the right to ascertain what type of Personal Data FIABCI holds about you and to receive a copy of this Personal Data**.**
- **Right to Complain:** You have the right to lodge a complaint regarding the processing of your Personal Data to the Data Protection Commission.
- **Right to Erasure:** In certain circumstances you may request that we delete the Personal Data that we hold on you.

- **Right to Object:** Where we rely on our legitimate interests to process your Personal Data, you have a right to object to this use. We will desist from processing your personal information unless we can demonstrate an overriding legitimate interest in its continued processing.
- **Right to Portability:** You may request us to provide you with certain Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.
- **Right to Rectification:** You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
- **Right to Restriction:** You have the right to request that FIABCI stop using your Personal Data in certain circumstances including if you believe that the Personal Data we hold about you is inaccurate or that our use of your Personal Data is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.

6.2 What responsibilities do you have?

We ask that you make an effort to keep your own contact details, user preferences and personal interests up to date in the Members' Area of our website (FIABCI Community), so that new connections can be made and relevant communications can be sent to you.

You are responsible for maintaining the confidentiality of your own password and online account and for any and all activities which may occur when logged into our FIABCI Community.

Please notify FIABCI immediately if you suspect unauthorised use of your account, access to your password or any other breach of security known to you.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed. If you require further information, or wish to exercise any right, please email fiabcihq@fiabci.org or send us a letter.

We will respond to your request (including providing information on whether the rights apply in the particular circumstances) within the applicable statutory time period. If we are not sure of your identity, we may require you to provide further information in order for us to confirm who you are.

If you have further concerns about how we use your personal data, you can make a complaint and ask us to have the matter investigated. If you are not satisfied with our response or believe the way we are processing your personal data is not in accordance with the law you have the right to contact the French Data Protection Authority (Commission Nationale de l'Informatique et des Libértés – CNIL). Please visit https://www.cnil.fr/en for more details of your data protection rights and how to contact them.

Data controller:

FIABCI Headquarters
CIT Tower Montparnasse
3 rue de l'Arrivée, 11th floor – 1109
Paris 75015, France

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