



D.I.C, Building 17 - Office 162
Dubai - United Arab Emirates
DPO: Tel: +31 6 24209111
Email: compliance@nwns.org

NWNS PRIVACY POLICY

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

We do not knowingly collect personal data from anyone under the age of 18. If you are a parent or guardian and become aware that your child has provided us with personal information without your consent, please contact us using the email compliance@nwns.org

WHAT INFORMATION DO WE COLLECT?

NWNS collects and processes the following personal data about you:

- Name
- Company
- Job title
- Address
- Email address
- Phone numbers
- Information regarding your sector of business.

This information is collected in the following ways:

- When you fill in your information on our website (including setting up an account).
- When you provide information to us either by phone, email or mail or at one of our conferences or events.
- When you engage with us on LinkedIn or other social media websites.

NWNS may also collect information regarding your activity on our website through automated means including:

- Analytical data regarding your location
- Your IP address



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- Your browser type
- Details of any transactions you make on our website

NWNS may also collect personal information that is stored in any presentation material you submit to us. This information is published to all attendees of the event you presented at. You have the right to ask us not to distribute your presentation material and this must be confirmed in writing prior to the event taking place. Should you wish to remove your presentation from the public domain in the future you can do so by contacting our database support team on compliance@nwns.org

At NWNS we do not store any information with regards to credit card transactions made on our website. This information is transmitted directly and securely for processing to our third-party payment processor.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Aggregated data

We may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Sensitive data

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.



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DATA SECURITY

We have put in place appropriate security measures 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 those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. 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.

HOW WE PROCESS YOUR INFORMATION?

We use your personal data in the following ways:

- To register you as a new customer or account holder.
- To process and deliver your order including to manage payments and collect and recover money owed to us.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information about products or services (including those of our Group Companies (see definition below)) that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes or we feel that there is a legitimate business reason to do so.
- To carry out our obligations arising from any contracts entered with you.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To administer and protect our business, our website, prevent fraud and comply with our legal and regulatory obligations.
- To manage our relationship with you including to notify you about changes to our service.

Presentation information will be used as distribution material after the event unless you have stated that you do not wish your presentation to be distributed.



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WHO YOUR INFORMATION IS SHARED WITH

NWNS does not share your personal data with any third parties other than as set out below and in the section "Disclosure of Your Information". We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Companies in the NWNS Group

NWNS is part of an international group of companies. We may share your personal data with relevant group companies ("**Group Companies**") to the extent required for the processing purposes set out above. In particular, these Group Companies include 4Power FZC, NWNS (Europe), Paradigm Ltd, Green A&E International BV, Green A&E Ltd, MangoSat BV

Service Providers

We share your personal data with our service providers, who provide us with certain business and administrative services, to the extent necessary as part of those services. For example, we may use third party service providers or applications to send emails or engage in calling campaigns on our behalf. All our third party service providers are vetted and checked and only process your personal data on our instructions.

Event Sponsors

We may hold events or webinars in conjunction with certain selected sponsoring partner organizations ("**Third Party Sponsors**"). Information about any specific Third Party Sponsors of an event or webinar will be made available on the sign-up page for that event or webinar. We share the personal data you provide on signing up for a sponsored event or webinar with that Third Party Sponsor. Subject to applicable law and any preferences you have expressed, that Third Party Sponsor may use your information for its own marketing purposes.

Other Third Parties

We may also share your personal data:



- With our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- With Netherlands and Dubai Revenue & Customs, regulators and other governmental or regulatory authorities who require reporting of processing activities in certain circumstances.
- With third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation to which we are subject, in order to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of NWNS, our customers, or other third parties. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Sharing of Presentation Material

As part of the service provided by NWNS all event presentations are shared with the attendees of the event after the event has ended. These presentations are stored and converted to PDF format and can only be accessed using the Portal login.

Presenters can choose not to have their presentations or biographies posted to the Portal. These requests should be made in writing at the time of the agreement to speak at the event. Should you wish to update or remove this information from the Portal in the future, these requests must be made to the database team at NWNS (compliance@nwns.org) who will process your request.

INTERNATIONAL TRANSFERS

We share your personal data within the Group of Companies. This will involve transferring your data outside the Netherlands and/or the European Economic Area (**EEA**). Some of our external third party service providers or Third Party Sponsors may be based outside the the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.



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- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the NL authorities (or, where applicable, the European Commission).
- We may use specific contracts approved by the NL authorities (or, where applicable, the European Commission) which give personal data the same protection it has in Europe.
- Where we transfer data to entities based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

LEGAL BASIS FOR PROCESSING YOUR DATA

We only use your personal data when the law allows us to. Most commonly, we use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party (for example) our Group Companies)) and your interests and fundamental rights do not override those interests, which



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include developing our products and services, growing our business, keeping our product and services relevant, efficiently fulfilling our legal and contractual duties and managing legal risk, providing high-quality customer service, and keeping you informed (including marketing).

Where we need to comply with a legal obligation.

- Where you have provided your consent (see “Marketing” below).

Marketing – General

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if: (a) you have requested information from us, or (b) you have purchased goods or services from us or we have a legitimate interest in marketing to you, and you have not opted out of receiving that marketing. You may also receive marketing communications regarding relevant products and services from our Group Companies where (a) you have requested such information or (b) where you have not opted out and we have a legitimate interest in marketing to you. You can ask us or our Group Companies to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Marketing – Consent and Legitimate Interests

At NWNS we attempt to gain your consent where possible to process your personal data we do this by providing you with the option to opt-in on all our forms and website pages.

Where we have been unable to confirm your consent (but you have not otherwise indicated you do not wish us to contact you), we may contact you on the grounds of our legitimate interests. Our legitimate interests are to develop and grow our business (including the business of our Group Companies), to promote our products and services (and those of our Group Companies) and to inform our marketing strategy and maintain the relevance of our service offering. Where we rely on legitimate interests, we will only provide you with relevant information regarding your business sector.



If you choose to withdraw or provide your consent at any time this will overwrite any legitimate business interests NWNS may hold for your information. You can withdraw your consent at any time by sending an email to compliance@nwns.org. In some cases, it may be necessary to contact you if you have withdrawn your consent including where you have an outstanding balance with NWNS, you have a contractual obligation to NWNS, or for legal reasons.

WHAT ARE YOUR RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- The right to be informed. Individuals have the right to be informed about the collection and use of their personal data. This privacy notice fulfils that requirement.
- The right of access. You can request your data from NWNS at any time please forward this request to compliance@nwns.org
- The right to rectification. If your data is incorrect, please let us know and we will update accordingly. The right to erasure. You can request this at any time by emailing your request to compliance@nwns.org
- The right to restrict processing. You can update your preferences by visiting our website or by emailing your request to compliance@nwns.org
- The right to data portability. You can request your data be transferred to yourself or a third party by contacting compliance@nwns.org
- The right to object. You have the right to opt-out of any marketing communications that we may wish to send you. You can change your marketing preferences at any time by using the 'opt out' link contained in our marketing emails and on our website.
- Rights related to automated decision-making including profiling. NWNS does not apply any automated decision-making or profiling to any of your personal data.
- You have the right to lodge a complaint with the Information Commissioner's Office.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.



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We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). Alternatively, we could refuse to comply with your request in these circumstances. We try to respond to all legitimate requests within one month.

COOKIE NOTICE

Please see our [Cookie Policy](#) regarding our use of cookies and similar technologies.

THIRD PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

CHANGES TO THIS PRIVACY NOTICE

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.