

# Empower ehf Privacy Policy

This Privacy Policy applies to Empower ehf (EP) and all existing and future subsidiaries.

At EP we respect your privacy. We have implemented this privacy policy to outline how EP uses personal data relating to its clients, visitors, supporters, web users and other individuals who interact with us.

EP considers your privacy to be important. We are committed to protecting the privacy of the information you provide to us, including your personal data. This policy describes the types of personal data we collect, how we use that data, with whom we share it, the choices you can make about our use of such data, your privacy rights and how the law protects you. We also describe the measures we take to protect the security of your personal data and how you can contact us about our privacy practices.

## Information we collect

As a privately owned company we may have a direct relationship with you, and you may choose to provide personal data to us in connection with that relationship or we may collect it via other means. The data we collect about you may include:

- Contact information
- Login details
- Financial information
- Content you provide to us
- Technical information about your device and website usage

## Contact information

If you interact with us (e.g. through our website) then we will collect certain basic contact information about you. This may include your name, postal address, email address, phone number.

## Know your client information

This may include your date of birth and personal address, passport number and/or national insurance number.

## Content you provide to us

For instance, you may get in touch with us via our website or by telephone, we may email you or vice versa or you may send us feedback via a survey form.

## Technical information about your device and website usage

If you use our website or mobile applications then we will install certain cookies and web beacons on your device.

A cookie is a small text file that is stored on your device. The cookies EP places on your device are used to store information including your preferences, and the pages on the website that you have accessed or visited. The information is used to optimize your experience by customizing our web page

content based on your browser type and/or other information. Some of these cookies are necessary for the full functionality of the web pages and for you to use all of the pages available. Some of the cookies analyse usage of EP and monitor user behaviour.

Through cookies, web beacons and similar technologies we may collect details about your device, such as IP address, internet browser type and operating system. We may also collect information about your browsing activity, such as how you use our website, the pages you have visited, the date and time of each visit and the URLs of any websites that re-directed you to our website.

You have the right to decide whether you want to accept cookies or not. If you do not want to accept cookies you can always turn them off by editing your browser settings or change how your browser uses cookies. Browser setup instructions can be found by visiting the help page of the browser you are using. [Here](#) you can find further information and instructions on how to delete cookies.

Please note that it may affect the performance of the website if you opt out or delete cookies and that it may prevent you from visiting certain sections of the website.

## **How we collect your information**

We use different methods to collect data from and about you, depending upon the nature of our relationship.

### **Direct interactions**

You may provide us with your data by completing forms (e.g. through our website) or by corresponding with us by post, phone, email or otherwise. This includes data you provide when you:

- Register for a conference or webinar.
- Register for our Newsletter.
- Provide us with feedback.
- Otherwise communicate with us.

### **Automated technologies**

As you interact with our website, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

## **How we use your data**

Depending on the nature of our relationship with you, we may use your data to:

- Process your participation in conferences, webinars.
- Administer your receipt of our newsletter.
- Provide you with information about our activities.
- Allow you to participate in interactive features e.g. via the website or podcasts.
- Operate, evaluate and improve our purpose and goals.
- Comply with our legal obligations, applicable industry standards and our policies.
- Other ways which we notify you of at the time of its collection or use.

The table below sets out further information about the purposes for which we use data about you, with the corresponding categories of data processed in each case and the legal basis that we rely upon for its use.

Purpose	Categories of data processed and legal basis for processing
<p><b>Process of registration for a conference or webinar</b></p> <ul style="list-style-type: none"> <li>▪ Initiate your registration, notify you status of the conference or additional information in relation to your registration.</li> <li>▪ Obtain know your client and credit information when you apply for a product or subsequently.</li> </ul>	<p><b>Categories of data processed</b></p> <ul style="list-style-type: none"> <li>▪ <i>Contact information</i></li> <li>▪ Know your client information</li> </ul> <p><b>Legal basis</b></p> <p>It is in our legitimate interests to process your personal data as part of our purpose of the company to organise conferences.</p>
<p><b>Provide you with information about our upcoming events and projects of EP</b></p> <ul style="list-style-type: none"> <li>▪ If you have requested or given your consent to receive such information from us, then we may contact you from time to time by email, post, telephone and/or SMS about our projects.</li> </ul>	<p><b>Categories of data processed</b></p> <ul style="list-style-type: none"> <li>▪ Contact information</li> </ul> <p><b>Legal basis</b></p> <p>We will only send you information about our projects if you have consented to receiving them or based on our legitimate interests.</p>
<p><b>Allow you to participate in interactive features</b></p> <ul style="list-style-type: none"> <li>▪ If you interact with the “app” function on our websites or subscribe or listen to our podcasts.</li> <li>▪ If you interact with us via our Facebook, Twitter, instagram or LinkedIn accounts.</li> </ul>	<p><b>Categories of data processed</b></p> <ul style="list-style-type: none"> <li>▪ Contact information</li> <li>▪ Information about your characteristics and preferences</li> </ul> <p><b>Legal basis</b></p> <p>It is our legitimate interest to provide such features which you may choose to take up for your convenience.</p>
<p><b>To share information with third parties</b></p> <ul style="list-style-type: none"> <li>▪ Organisation teams of the conferences.</li> <li>▪ Service providers who help EP to approach the purpose.</li> </ul>	<p><b>Categories of data processed</b></p> <ul style="list-style-type: none"> <li>▪ All personal data we hold about you</li> </ul> <p><b>Legal basis</b></p> <p>If you have consented or if it is our legitimate interest to share your personal data with trusted third parties we may share your personal data with third parties who provide us with services relevant to our company approach.</p>

<p><b>Comply with our legal obligations and our policies</b></p> <ul style="list-style-type: none"> <li>To audit compliance with our legal obligations including regulatory requirements.</li> </ul>	<p><b>Categories of data processed</b></p> <ul style="list-style-type: none"> <li>All personal data we hold about you</li> </ul> <p><b>Legal basis</b></p> <p>It is necessary for compliance with legal obligations to which we are subject.</p>
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We may also share your personal data with third parties in the event that we cooperate with other organisations with the same purpose.

If we use your personal data in ways that are not described above, we will provide you with notice of this before doing so.

## Data we share and receive

We do not sell or otherwise disclose your data, except as described in this privacy policy. We may share your data with the following parties:

- Other legal parts of EP.
- IT suppliers.
- Our insurers and professional advisers.
- Regulators and other government agencies including, but not limited to, public authorities, regulators, the police and other law enforcement agencies.

We do not authorise any third parties that we share data with to use or disclose your data except as necessary to perform certain services on our behalf or comply with legal requirements. We require these third parties, through our contractual arrangements with them, to appropriately safeguard the privacy and security of the data they process on our behalf.

We may also receive data about you from the following third parties:

- Social media platforms.
- Regulators and other government agencies.

If you would like to receive a full list of our suppliers and other third parties who we share your data with or receive your data from then you can get in touch with us using the details provided in the section "Who should you contact with questions?".

## Where your data may be sent

In line with strategic expansion plans, we may be required to transfer data internationally. Accordingly, your personal data may be transferred globally (if your data is collected within the European Union, this means that your data may be transferred outside of it).

When using personal data as described in this privacy policy, it may be transferred either within or outside the country or territory where it was collected, including to a country, territory or international organisation that may not have EU equivalent data protection standards.

For example, we may transfer your personal data to a cooperation partner or service partner based outside the European Union. In all cases, the transfer will be on the basis of a [European Commission adequacy decision](#) or we will implement adequate measures, for example the [EU Model Contracts](#), and including additional appropriate security measures, for the protection of personal data in those countries, territories or international organisations in accordance with applicable data protection laws. If you would like more information about any of the data transfer measures on which we rely please contact us using the details provided in the section “How to reach us?”.

## **How we keep your information secure**

EP will take appropriate technical and organisational security measures to secure your personal data and to protect it from loss, misuse or alteration. Personal data that we hold about you is stored on our secure servers or those of our appointed suppliers. Our web pages that collect your data are secured.

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 this password confidential. We ask you not to share this password with anyone.

EP maintains an information security program that is designed to:

- Secure and maintain confidentiality of your personal data.
- Protect against anticipated threats or hazards to security or integrity of your data.
- Protect against unauthorised access to or use of your data that could result in substantial harm or inconvenience to you.
- Comply with applicable laws.

## **How long we may keep your data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data can be requested by contacting the DPO.

In some circumstances you can ask us to delete your data, please see “Your Rights and Choices”.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with or be used to identify you) for research or statistical purposes in which case we may use such data indefinitely without further notice to you.

## **Your rights and choices**

You may have some or all of the following rights in respect of personal data about you that we hold:

- Request us to give you access to it.
- Request us to rectify it, update it, or erase it.
- Request us to restrict our using it, in certain circumstances.
- Object to our using it, in certain circumstances.
- Where legally possible, withdraw your consent to our using it.
- Data portability, in certain circumstances.

You are able to exercise these rights by contacting us using the details set out in the “How to reach us” section below.

You have the rights set out in the table below:

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
<ul style="list-style-type: none"> <li>● To request us to give you access to it</li> </ul>	<p>This is confirmation of:</p> <ul style="list-style-type: none"> <li>● whether or not we process data about you;</li> <li>● our name and contact details;</li> <li>● the purpose of the processing;</li> <li>● the categories of data concerned;</li> <li>● the categories of persons with whom we share the data and, where any person is outside the EU and does not benefit from a <a href="#">European Commission adequacy decision</a>, the appropriate safeguards for protecting the data;</li> <li>● (if we have it) the source of the data, if we did not collect it from you;</li> <li>● (to the extent we do any, which will have been brought to your attention) the existence of automated decision-making, including profiling, that produces legal effects concerning you, or significantly affects you in a similar way, and information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and</li> <li>● the criteria for determining the period for which we will store the data.</li> </ul> <p>On your request we will provide you with a copy of the data we hold.</p>
<ul style="list-style-type: none"> <li>● To request us to rectify or update it</li> </ul>	<p>This applies if the data we hold is inaccurate or incomplete.</p>
<ul style="list-style-type: none"> <li>● To request us to erase it</li> </ul>	<p>This applies if:</p> <ul style="list-style-type: none"> <li>● The personal data we hold is no longer necessary in relation to the purposes for which we use it;</li> <li>● we use the data on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all personal data about you in which case we will respect your wishes);</li> <li>● we use the data on the basis of legitimate interests and we find that, following your objection, we do not have an overriding interest in continuing to use it;</li> <li>● the data was unlawfully obtained or used; or</li> <li>● to comply with a legal obligation.</li> </ul>

<ul style="list-style-type: none"> <li>• To request us to restrict our processing of it</li> </ul>	<p>This right applies, temporarily while we look into your case, if you:</p> <ul style="list-style-type: none"> <li>• contest the accuracy of the personal data we use; or</li> <li>• have objected to our using the personal data on the basis of legitimate interests</li> </ul> <p>(if you make use of your right in these cases, we will tell you before we use the data again).</p> <p>This right applies also if:</p> <ul style="list-style-type: none"> <li>• our use is unlawful and you oppose the erasure of the data; or</li> <li>• we no longer need the data, but you require it to establish a legal case.</li> </ul>
<ul style="list-style-type: none"> <li>• To withdraw your consent to our using it</li> </ul>	<p>This right applies to any data which we have collected and process based on your consent.</p> <p>You have the right at any time to withdraw the consent you have provided to us.</p>
<ul style="list-style-type: none"> <li>• To data portability</li> </ul>	<p>This right applies:</p> <p>(i) to personal data that you have provided to us; and</p> <p>(ii) if we use that data on the basis either of your consent, or on the basis of discharging our contractual obligations to you.</p> <p>If both (i) and (ii) apply, you have the right to receive the data back from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible.</p>
<ul style="list-style-type: none"> <li>• To lodge a complaint with a supervisory authority</li> </ul>	<p>You can always complain to the supervisory authority of Iceland, the Icelandic Data Protection Agency, on their website <a href="https://www.personuvernd.is">https://www.personuvernd.is</a> , by telephone (+354) 510 9600, or by e-mail to <a href="mailto:postur@personuvernd.is">postur@personuvernd.is</a>.</p>

## How to reach us

If you have any questions about our privacy policy, including any requests to exercise your legal rights in relation to the data we hold on you, then please contact our DPO using the details set out below:

Dominic Nieper  
Empower ehf  
Barugata 36  
Reykjavik 101  
Iceland  
[dpo@empower.is](mailto:dpo@empower.is)

## Updates to this privacy policy

We will update this policy from time to time to reflect changes in our company. We will inform you of these changes as required under applicable laws.

This privacy policy was last modified on 18<sup>th</sup> November 2020.