

Privacy Statement

British Association of Monaco (BAM) is committed to protecting your privacy and developing processes and expanding our use of technology to ensure your privacy is maintained. This **Privacy Statement (the 'document')** applies to BAM data processing and the BAM Web Site and governs our data collection and usage. The **BAM Web Site** is the generic term we will use in this **document** to describe any Internet-based server we operate and include both web and email servers.

Collection of your Personal Information

BAM collects through various means personally identifiable information, such as your membership number, e-mail address, name, home or work address or telephone number, age and some other demographic information that you provide, and your usage of our services and we divide this into four classes of information privacy.

- **Class 1) Non-Internet personal class** - this is the default personal information class that we provide. This class of information will never be hosted or processed on an Internet-based server e.g. the BAM Web Site. By becoming a member of BAM then you consent to the data practices described in this **document** related to class 1 data.
- **Class 2) Internet personal class** - this is information that BAM uses to enable your BAM Web access on our Internet Servers. **This is restricted to your email address, name and BAM membership number.** All other personal information you provide to BAM is considered to be Class 1) information unless you implicitly approve BAM to use the information e.g. you ask BAM to advertise your address or phone number on the BAM Web Site or in the BAM newsletter. You have the right to alter your email and name as we store it on the BAM Web Site at any time using the BAM Web Site. By using the BAM Web Site, you consent to the data practices described in this **document** related to class 2 data.
- **Class 3) Statistics class** - this is information about your pages accesses, computer hardware or software that is automatically collected by BAM. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses or search terms or an email message reference. This information is used by BAM for the operation of the service, to maintain quality of the service, and to provide statistics regarding use of the BAM Web Site. By using the BAM Web Site, you consent to the data practices described in this **document** related to class 3 data.
- **Class 4) Demographics class** - this is information about the BAM members which is disambiguated to not identify back to one person. This information is used by BAM for our marketing purposes, to maintain the quality of the services that BAM provides, and to provide statistics regarding BAM membership. By becoming a member of BAM then you consent to the data practices described in this **document** related to class 4 data.

Please keep in mind that if you directly disclose personally identifiable or sensitive information in the BAM Newsletter, or on the publicly visible sections of the BAM Web Site or on our forums then this information may be collected and used by others outside of BAM over which BAM has no control. BAM is not responsible for the privacy statements or other content on Web sites outside of the BAM Web Sites even if we link to or advertise these sites in our communications with you.

Geographic Restrictions

All BAM Web Sites and backups will be located within the European Union (EU), EFTA or Monaco but you may access the BAM Web Sites globally.

Some technical services may be provided by **non-BAM Web Sites** located outside of the EU/EFTA/Monaco but these technical services will not process any BAM personal data (Classes 1, 2 and 4) but will be limited to the statistics (class 3) only or to other non-personal technical data not covered by Monaco or EU Data protection legislation. An example of this would be our Domain registration and Domain Name System (DNS) or Public Key Infrastructure (PKI) servers.

BAM will disclose your personal information only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on BAM or the site; (b) protect and defend the rights or property of BAM; and, (c) act under exigent circumstances to protect the personal safety of users of BAM, or the public.

The jurisdictions would be any of the UK, Monaco, France or Italy or any other country within the EU or EFTA in which we have financial, legal, administration or technical support.

Use of your Personal Information

BAM collects and uses your personal information (Class 2) to operate the BAM Web Site and deliver the services you have requested. BAM also uses your personally identifiable information (Class 1 or 2 depending upon if you use email or post) to inform you of other products or services available from or via BAM. BAM may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

BAM does not sell, rent or lease its customer lists to third parties. BAM may share data with trusted third parties to help us perform statistical analysis, send you email or postal mail or provide customer support or to maintain on-site systems or off-site backup facilities or to help us correct errors in personal information. All such third parties are prohibited from using your personal information except to provide these services to BAM, and they are required to maintain the confidentiality of your information at all times according to the class of information. Trusted third parties are limited to the specific class of data that they have been approved for by BAM.

Any statistical processing of personal (Class 1 and 2) or demographic information (Class 4) when presented will always disambiguate the information to not identify one person. BAM does not use or disclose sensitive personal or demographic information without your consent as implied by your use of the classes defined above.

BAM keeps track of the Web sites ("outlinks") and pages you visit within the BAM Web Site, in order to determine what BAM services are the most popular. This data may be used to deliver customized content (including advertising) within BAM if such behaviour indicates that they are interested in a particular subject area.

When you cease to be a BAM member then you have the right to have your Class 1 and 2 information removed from the BAM databases and systems. When you cease to want BAM Web Site access then you have the right to have your class 2 information removed from the BAM

internet servers. We are unable to remove your class 3 or 4 data that we have previously collected as these two classes of information do not readily identify you but identify your access to our services or are sufficiently disambiguated to not identify you. By definition we do not know which records in the class 3 and 4 data is actually you to remove this data. **You have the right to ask for a copy of the Class 1 and 2 data and for this to be corrected by BAM if it is incorrect.**

Use of Cookies and Tracking

Tracking through cookies: The BAM Web Site uses "cookies" to help you personalize your access. A cookie is a text file that is placed on your computer by a Web server. Cookies cannot be used to run programs or deliver malicious content to your computer. Cookies are uniquely assigned to your web browser software, and can only be read by a web server in the domain that issued the cookie to your web browser software.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize BAM pages, or register with BAM Web Site or services, a cookie helps BAM to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as login name or other information that the BAM Web Site has asked from you. When you return to the same BAM Web Site, the information you previously provided can be retrieved, so you can easily use the BAM features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the BAM services or BAM Web Sites you visit.

Tracking through tags is where small segments of JavaScript code are embedded in our web pages. Every time you request a new page, your browser will send information to a server that we have designated as collecting this particular Class 3) Statistics class data (as previously defined above).

These tags help us to identify the most popular sections of the BAM Web Site and improve our services. You may deactivate this tags by disabling JavaScript in your browser within the security settings. However, once JavaScript is disabled, parts of the BAM Web Site may not function correctly.

Tracking email links is a process whereby emails we send to you have personalised links to our BAM Web Site. Every time you click these links then we record that you have done this. We send this information to a server that we have designated as collecting this particular Class 3) Statistics class data (as previously defined above).

These tracking links help us to identify which services are the most popular or if you are having problems with use of our services. You do not need to click these links but can access our services directly or you can withdraw your use of the BAM Web Site and we will not send you emails and you can use postal services (withdrawing the use of Class 2,3 and 4 data but retaining Class 1 use).

Tracking website outlinks is a process whereby links out of the BAM web server to other web sites on the BAM web pages have special behaviours defined when you click them. Every time you click these links then we record that you have done this. We send this information to a server that we have designated as collecting this particular Class 3) Statistics class data (as previously defined above).

These tracking links help us to identify to identify which services are the most popular or if you are having problems with use of our services. You do not need to click these links but can either disable JavaScript or manually visit the external site.

Security of your Personal Information

BAM reduces the risk to your data by segmenting your personal data into four classes. As a BAM member, if you do not desire to use the BAM Web Site then no personal data from the Default non-Internet Class 1 will ever be made available on any Internet server and you will be limited to postal-only access to BAM.

BAM secures your personal information from unauthorized access, use or disclosure using commercially reasonable efforts. The non-internet class 1 data is only hand-carried as backups on encrypted media, but at a future time it may be necessary to electronically transmit the backups. In any case this class will always use strong encryption to protect it when it is in-transit.

The other classes of data 2,3 and 4 may or may not use in-transit encryption and though protected from unauthorized access, use or disclosure they will necessarily be in an unencrypted presentation in transit or where they terminate or where they are generated on our BAM Web Site or our designated 3rd party provider servers.

Individuals under the age of 18

The BAM website does not seek to collect personal data from individuals under the age of 18. Individuals under the age of 18 should receive permission from their parent or legal guardian before providing any personal data to BAM on the BAM Website.

Changes to this Statement

BAM will occasionally update this Statement of Privacy (**document**) to reflect changes to the Association based on feedback or if we are legally obliged to comply. The date on the bottom of this page will be amended. BAM encourages you to periodically review this **document** to be informed of how BAM is protecting your information.

BAM welcomes your comments regarding this Statement of Privacy (**document**). If you believe that BAM has not adhered to this **document**, please contact the BAM Secretary at **bam@monaco.mc** immediately. We will use commercially reasonable efforts to promptly determine and remedy the problem.

This version 1.0 dated 7th September 2009.

Copyright 2009, British Association of Monaco