

**Policy:****Privacy**

Effective Date:

02/17/2022

Confirmation:

*Mariya Entina***Purpose**

The privacy policy ("Privacy Policy") describes how we gather and protect individually identifiable information ("Personal Information"). It describes how we use, process, transfer, and share Personal Information. And it describes personal data privacy rights. This Privacy Policy applies to Personal Information that we collect through any means, including the CFA Society Los Angeles website, digital advertising, events and conferences, employment processes and direct interactions with CFA Society Los Angeles staff.

**PRIVACY POLICY**

CFA Society Los Angeles is a not-for-profit professional membership association committed to leading the investment profession globally. We are located at 13400 Riverside Drive, Suite 215, Sherman Oaks, CA 91423, and we own and operate a website (the "Site").

**Summary of Key Points**

By using the Site or providing Personal Information to us you consent to our processing and transfer of your Personal Information as we describe below.

We collect Personal Information when you provide information to CFA Society Los Angeles through the Site, when you sign up for CFA Society Los Angeles information through digital advertising, when you register for an event, or through other communications with CFA Society Los Angeles and CFA Society Los Angeles personnel. We use Personal Information to provide CFA Society Los Angeles products and services to you.

We use cookies and other technologies to track the use of our Site and for advertising purposes. Learn more about the use of cookies and technologies, and about opportunities to choose not to allow cookies below.

You can view your Personal Information on file with us at any time by visiting your "Profile." You can change your preferences for how we contact you by contacting us.

We share Personal Information with member societies, exam preparatory providers and other partners which provide products and services that may be of interest to you.

When we process your Personal Information based on your consent, you have a right to withdraw your consent. We also provide you additional rights to access, rectify, and erase your Personal Information, to obtain a portable copy of your Personal Information, and to restrict or object to our processing of your Personal Information. These rights are limited under the applicable local data protection law.

We maintain reasonable and appropriate technical, physical, and administrative measures to protect the security of your Personal Information. Access to Personal Information is limited.

Our Site may have links to other sites that we do not control. Their privacy policies may differ from ours. We encourage you to read the privacy statement of any website you may visit.

If we make any material changes to our privacy practices, we will post a prominent notice on our Site notifying users of the change.

### **Consent**

By using the Site or providing us with Personal Information you consent to our processing and transfer of your Personal Information as we describe here.

If you provide us with “sensitive” Personal Information, which includes information like:

- Ethnic or racial origin
- Religious or philosophical beliefs,
- And/or Health or medical conditions

Providing us your information constitutes your consent to the collection, use, transfer, and sharing of that information for the purposes described in the record where you provide the information and in this Privacy Policy. If a specific element of our processing of your Personal Information relies upon your consent you may withdraw your consent as described below in "Your Rights."

### **Cross-Border Data Transfers**

We transfer Personal Data to jurisdictions outside of your home country as necessary for the purposes described in this Policy, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers. With respect to transfers originating from the European Economic Area ("EEA") and the United Kingdom, we implement standard contractual clauses and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

If you are located in a country other than the United States, you consent to the transfer of your Personal Information to us in the United States, to third party data processors located in the United States that we select, and to local Member Societies and third parties in other countries as we select. Other countries may not provide a level of data protection to your Personal Information equivalent to that provided by your home country.

### **The Information We Collect**

We collect Personal Information to help us better understand your needs, to provide you with personalized and efficient service, and for other purposes described in this Privacy Policy. We generally obtain Personal Information directly from you through the information that you provide to CFA Society Los Angeles or CFA Institute. We also may obtain Personal Information automatically, through the use of cookies and other technologies, and in some instances from third parties, such as companies that sponsor programs or conferences in which CFA Society Los Angeles participates. We do not knowingly collect any Personal Information from children under the age of 16, and users under the age of 16 should not submit any Personal Information to us

### **Bases for Processing**

Our bases for processing your Personal Information are:

- Contractual Necessity
- Legitimate Interests of CFA Society Los Angeles

- Compliance with Legal Obligations
- Where necessary, Consent

Before we process Personal Information on the basis of the legitimate interests of CFA Society Los Angeles we review our processing in light of the interests and fundamental rights and freedoms of the data subject taking into account their reasonable expectations. Where we believe those interests or fundamental rights and freedoms override our legitimate interests, we will seek another valid basis for processing your Personal Information or refrain from that processing activity. Examples of our “legitimate interests” for processing your Personal Information include (but are not limited to):

- Processing for direct marketing purposes or preventing fraud
- Transmission of personal data for internal administrative purposes
- Processing for the purposes of ensuring network and information security
- Reporting possible criminal acts or threats to public security to a competent authority
- Information You Provide to CFA Society Los Angeles

### **Information You Provide to CFA Society Los Angeles**

You may provide Personal Information to CFA Society Los Angeles in a number of ways, including: (1) through your use of the Site, such as registering for an account and signing up to receive newsletters; (2) through data collection forms on CFA Society Los Angeles’s website or other digital advertising; (3) upon registering for any CFA Society Los Angeles educational offering, including the US/CFALA CFA Review Program or any of our other professional learning programs; (4) upon becoming a Member; (5) upon communicating directly with CFA Society Los Angeles either electronically or by providing hard copies of documents; and (6) upon registering for CFA Society Los Angeles conferences or events.

### **The Personal Information We Collect**

Listed below are the classes of Personal Information that we collect. Please note, however, we do not collect all this Personal Information from everyone.

- Contact Data (name; personal contact information (phone, email address, physical address))
- Financial information
- Credit card data
- Gender
- Birthdate
- Educational background
- CFA Institute ID
- Marital status
- Reference letters
- Work experience
- Username
- Password
- Individual's status in CFA's programs
- Behavioral data (how members use our content and offerings)
- Work location
- Employee number
- Job/position title
- Work contact data (telephone and fax numbers and email address)
- Business group and country code data
- IP Address or Mobile Device ID
- Referring website

- Type of Browser
- Type of Operating System

### **Purposes for Which We Use Personal Information**

The purposes for which we process your Personal Information are listed below:

For Members, Candidates, and Attendees at our Events:

- General membership and account management
- Processing your orders
- Processing applications and registrations that you submit to us
- Marketing
- Website Management
- Measuring effectiveness of our products and services
- Scholarship Program Award and Administration
- Maintain the online CFA Society Los Angeles member directory

For Visitors to the Site:

- General account management and CFA Institute administration
- Marketing
- Website Management
- Website Improvement
- Scholarship Program Award and Administration

### **Cookies and Other Tracking Technology**

Our Site uses cookies and other tracking devices to collect information automatically which we may use for purposes outlined in this Privacy Policy such as targeted advertising. These tracking devices may be placed by us or by our third-party partners or vendors. By using the Site, you agree to the use of cookies and other tracking devices as described below. You may configure your Internet browser to notify you when a cookie is sent (giving you the option to decide whether to accept it or not), and to reject or remove cookies. To remove cookies, please follow your browser's instructions or contact your browser provider for more information. By removing or refusing to accept cookies, you may be unable to use or access some features of our Site.

#### **Cookies**

Cookies are small pieces of information that a website transfers to your computer. Our Site uses session ID cookies (expire when you close the browser) and persistent cookies (persist even after you close the browser), which help our Site run more smoothly and tailor content for you. Our Site includes a mechanism to manage the cookies that we use on our Site through your Profile. Additionally, most web browsers have options that allow you to control whether to accept cookies and give you the option to delete all cookies. However, disabling may prevent access to some parts of our Site. Do Not Track Signals: If you wish to not be tracked during your visit to our Site, please follow your browser's "Do Not Track" instructions or contact your browser provider for more information. By sending a Do Not Track Signal, you may be unable to use or access some features of our Site.

#### **Log Files**

We also gather Personal Information automatically and store it in log files. For instance, when you visit our Site or use our mobile app, the server may automatically recognize information about you, including: the date and time you visited our

Site, the pages you visited, the referrer (the website you came from), the type of browser you are using (e.g., Firefox, Internet Explorer), the type of operating system you are using (e.g., Windows or Mac OS), and the domain name and address of your internet service provider.

## **How We Share Information**

### Third Party Processors and Transaction Processing

We engage third parties to perform services in connection with the operation of this Site and our organization. Examples of these third parties include website hosting service providers, technology service providers, payment processors, legal advisers and consultants. We share Personal Information with these third parties, but we authorize them to use this Personal Information only in connection with the services they perform on our behalf. Such parties are bound by contract to establish appropriate measures to protect your Personal Information from unauthorized access, use, or disclosure. In addition, we share certain Personal Information with third parties as necessary to facilitate our offering of products and services to you.

### Third Party Products and Services

If you authorize us to do so by opting in, we may share your Personal Information with select third parties that offer services or products that we believe may be of interest to you. These third parties may contact you with communications regarding their own services or products. Such third parties may include exam preparatory providers, exhibitors at and sponsors of CFA Institute events, University Program Partners, and other CFA Institute partners. Please note that, if you receive any communications from these third parties, you may contact them directly to opt-out of receiving further communications from them.

### CFA Society Los Angeles Member Directories

We make Member name, location, and company available through the CFA Society Los Angeles online Member Directory, which is searchable on the CFA Society Los Angeles member side of the Site, as well as by phone and email upon a third party's request. Members may choose to make additional information available on the Member Directory by changing their account preferences.

## **Event Attendees**

For some CFA Society Los Angeles events, we may make certain Personal Information of all event attendees available to other event attendees and event sponsors. The Personal Information made available may include name and employer.

### Legal Compliance

We share Personal Information required by law or at the request of government regulators or other law enforcement officials and the courts.

### CFA Society Los Angeles Networking Sites

The Sites offer opportunities to interact with others and/or submit or post messages or other content, such as on CFA Society Los Angeles discussion boards. The Sites may also provide for interactions with third party websites or services. Please note that any information or materials that you post or submit through such CFA Society Los Angeles Networking Sites will be publicly posted to everyone that has access to the relevant Site. We encourage you to use caution when you submit any information or materials on or through any CFA Society Los Angeles Networking Site or interact with third party websites or services through plug-ins.

### **Your Communication Preferences**

You may change your preferences for how we contact you by contacting us using the information provided under the “Contact Us” section of this Policy.

In order to provide you with superior service, we may contact you to resolve a problem even if you have asked us not to contact you for other purposes.

### **Accessing and Updating Your Personal Information**

You may view your Personal Information on file with us at any time by visiting Your Profile (account login required) on the CFA Society Los Angeles website, where you may change some of your Personal Information. Please note that we may require additional information to authenticate your identity.

### **Your Rights**

We provide you with the rights to:

- Withdraw your consent to processing your Personal Information.
- Request access to your Personal Information.
- Request rectification of your Personal Information.
- Request erasure of your Personal Information.
- Request restriction of processing of your Personal Information.
- Request data portability.
- Object to the processing of your Personal Information (including objection to profiling).

Please note that all of these rights are limited under your applicable local data protection law. If you exercise or seek to exercise any of those rights, our obligations to respond are limited by and subject to applicable law.

**Right to withdraw your consent:** If a specific element of our processing of your Personal Information relies upon your consent (in particular regarding the receipt of direct marketing communication via email and telephone), you may withdraw your consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

The “Your Communications Preferences” section of this Privacy Policy above describes communication-specific options we provide to you to allow you to easily withdraw consent for certain elements of our processing. You may also withdraw your consent regarding the receipt of direct marketing communications directly through your CFA Society Los Angeles account. In particular, in instances where you have opted-in to sharing your Personal Information with other third parties, you may contact us to opt-out of future sharing of your Personal Information with such parties in the future; however, such withdrawal will not affect the lawfulness of the transfers that occurred prior to the consent withdrawal.

**Right to request access:** As described above, you may view your Personal Information on file with us at any time by visiting Your Profile (account login required) on the CFA Society Los Angeles website, where you may change some of your Personal Information. You also have the right to obtain from us confirmation as to whether Personal Information concerning you is being processed, and, where that is the case, to request access to the Personal Information. This access information includes:

- The purposes of the processing,
- The categories of Personal Information concerned, and
- The recipients or categories of recipient to whom the Personal Information have been or will be disclosed.

However, this is not an absolute right and the interests of other individuals can restrict your right of access.

You have the right to obtain a copy of the Personal Information undergoing processing free of charge. For further copies requested by you, we will charge a reasonable fee based on administrative costs.

**Right to request rectification:** You have the right to obtain from us the rectification of inaccurate Personal Information concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement. You may also change some of your Personal Information by visiting Your Account as described above in “Accessing and Updating Your Personal Information”.

**Right to request erasure (“Right to be forgotten”):** Under some circumstances, you have the right to obtain from us the erasure of Personal Information concerning you. This is not an absolute right and may be limited by our need to retain data to support our business operations or comply with legal or regulatory requirements.

**Right to request restriction of processing:** Under some circumstances, you have the right to obtain from us restriction of processing your Personal Information. In such case, the respective data will be marked and may only be processed by us for certain purposes.

**Right to request data portability:** Under certain circumstances, you have the right to receive the Personal Information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another entity without hindrance from us.

**Right to object:** Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Information by us and we can be required to no longer process your Personal Information. Such right to object may especially apply if we collect and process your Personal Information for profiling purposes in order to better understand your interests in our products and services or for direct marketing. If you have a right to object and you exercise this right, your Personal Information will no longer be processed for such purposes by us. You may exercise this right by contacting us as stated in the “Contact Us” section of this Privacy Policy. Such a right to object may, in particular, not exist if the processing of your Personal Information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

To exercise your rights, please contact us as stated under “Contact Us”. In some cases you also have the right to lodge a complaint with the competent data protection supervisory authority.

## **Security**

We maintain reasonable and appropriate technical, physical, and administrative measures to protect the security of your Personal Information. Access to Personal Information is limited to only those employees, contractors, or authorized agents of CFA Society Los Angeles who have authorization to access such Personal Information and such access is limited to the extent such information is needed to fulfill the task for which the Personal Information was collected. While we strive to protect your Personal Information, we cannot ensure the security of the information you transmit. We recommend you take every precaution in protecting your Personal Information when you are on the internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser.

## **Links**

This Site provides links to websites or services created and maintained by other individuals or organizations. Please note that these websites' privacy policies may differ from this Privacy Policy. We encourage you to read the privacy statement of any website you may visit, as we are not responsible for such websites' content and policies. We do not control these links or sites nor are we responsible for the accuracy, timeliness, security, or continued availability or existence of the

information provided on these sites. Other organizations linked from the Site may collect information about you when you visit their websites. We cannot control this collection of information. You should contact these companies directly if you have any questions about how they use the information they collect.

**Changes to This Policy**

Except where limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on this Site, and, if required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date above. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site.

**Contact Us**

For further information about CFA Society Los Angeles's privacy practices, please contact us at [info@cfala.org](mailto:info@cfala.org).

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