



## PCO Data Protection and Privacy Policy

[MCI Group Holding SA, 9, Rue du Pré-Bouvier, 1242 Satigny, Geneva, Switzerland or relevant MCI entity] (“**MCI**”) is an event and association management company with operations and subsidiaries in many countries around the world which provides association, congress management, meetings and event services to its corporate or association clients (the “**Client**”).

It is MCI’s utmost concern to constantly improve its services in order to best meet the needs of its Clients. To this end, MCI may collect and store certain information, including personal data of people like you. MCI takes the protection of your personal data very seriously in all of its business processes. This Data Protection and Privacy Policy is meant to help you understand how data are collected, processed and stored to meet legal requirements and MCI’s data protection standards.

It will be very difficult and in most countries even impossible for MCI to provide you services if you refuse to allow MCI to process your data. For this reason, by providing personal data to MCI, you agree to be legally bound by and explicitly consent to this Data Protection and Privacy Policy, as it may be amended from time to time. If you do not agree to this Data Protection and Privacy Policy or cannot form a legally binding contract, you are not permitted to provide personal data to MCI.

To complement this Data Protection and Privacy Policy, the MCI group has adopted Binding Corporate Rules (“**BCRs**”) to set up adequate safeguards to ensure that personal data is protected adequately when transferred within the MCI group from an MCI company based in the EU to an MCI company in another jurisdiction (or when such MCI company accesses personal data) where that transfer is not otherwise permitted by applicable law. All subsidiaries of the MCI group and employees related thereto must comply with and respect the BCRs whilst collecting, processing, transferring, accessing and using personal data.

### **1. Scope of this Data Protection and Privacy Policy**

This Data Protection and Privacy Policy applies to all of the PCO services offered by MCI.

This Data Protection and Privacy Policy does not apply to services offered by other companies or individuals. This Data Protection and Privacy Policy does not cover the information practices of other companies and organizations who advertise MCI services or any third party operating any website to which the MCI website or other digital asset may contain a link.

### **2. Data collected and method of collection**

#### ***2.1 In general***

MCI collects general and personal data concerning you from:



- you when you provide your details to MCI;
- its Clients (in such cases, Client must ensure that it is entitled to disclose such data and that you are aware of the various matters detailed in this Data Protection and Privacy Policy);
- participants at Client's meetings and events organized by MCI;
- users of MCI's or Client's websites; and
- third parties (such as online service provider or single sign on authority).

Following the reception of the data, an electronic profile is created in MCI's proprietary tools for each person or entity (the "**Contact Profile**").

The Contact Profile may contain but is not limited to:

- name;
- gender;
- date of birth;
- address;
- phone numbers;
- email addresses;
- organization or company of employment and/or job title;
- field of activity and/or interest;
- credit card references/numbers;
- travel destinations;
- travel schedules;
- travel preferences;
- accommodation preferences;
- other communicated preferences;
- passport; and
- visa details.

## ***2.2 Technical data***

Additionally, when you access our website, MCI and MCI's third party service providers may collect data of a technical nature in a variety of ways, including:

- from you, when you voluntarily provide information to MCI (e.g. information such as your location and your preferred means of communication is collected). Unless combined with Personal Information, this information does not personally identify you or any other user of the MCI website or other digital asset;
- through your browser;
- using cookies: cookies allow a web server to transfer data to a computer for recordkeeping and other purposes. MCI may use third-party advertising companies to serve ads when you visit a MCI website. Please note that these companies may use information about your visit to the MCI website



in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to this Site, these companies may place or recognize a unique cookie on your browser. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. Some features of the MCI website may not work properly if you decline the use of cookies. To learn more about cookies, please visit <http://www.allaboutcookies.org/> ;

- using pixel tags, web beacons, clear GIFs or other similar technologies.

The technical data gathered by MCI includes:

- the type of web browser and operating system used;
- the domain name of the Internet service provider;
- the IP-address of the computer used;
- the website from which you are visiting us; and
- the pages that you visit on our site as well as the date and duration of your visit and your activities on unaffiliated websites over time.

### **3. Purpose of data collection**

MCI uses the data collected to provide, maintain, protect and improve the overall quality of its services. Data collection is also meant to protect MCI and its users. MCI does not collect more data than is necessary to fulfill such purposes.

In addition to creating Contact Profiles, MCI uses your data for the following purposes and for which you give your consent:

- Bookings**: The Contact Profiles are stored in a database as a reference document to be consulted each time a booking is to be made. When a booking is made, MCI creates a booking code that contains all of the personal data along with the booking information that is needed to fulfill your request and to fulfill regulatory requirements for certain destinations. To make bookings, MCI might need to transfer personal data to various third party travel suppliers (such as airlines, hotels, car rental companies, online booking tool companies, safety and security tracking providers and computer booking systems) within your home country or in another country where you may be traveling and often also to government bodies for certain destinations.
- Consolidation of travel data**: At the request of a Client, MCI or a third party may prepare information reports that summarize and analyze the expenditures per destination, per travel supplier, etc. Such reports which may include certain personal data from your Contact Profile are then submitted to the requesting Client.



- c) Compliance with travel policy: At the request of a Client, MCI may report on your compliance with the event compliance policy, budget compliance policy or travel policy of such Client and identify any exceptions to the compliance.
- d) New products and services: With the goal of improving services and based on the data given to MCI, MCI may send you additional information related to your current or future event(s) and/or trip(s). An example might be a list of restaurants near a specific hotel in the destination city or parking facilities at the departure airport.
- e) Promotion and marketing: MCI may use your data to personalize your experience on the MCI website by presenting advertisements that are more relevant to you, to send you marketing communications that we believe may be of interest to you, including information about our services, case studies, thought leadership or whitepapers, blog updates, etc. For example, MCI uses third party service providers to present services and offers tailored to the preferences and interests demonstrated by your online activity over time. MCI may use your data for promotion and marketing purposes for MCI's current or prospective Clients and/or third parties in MCI's industry. MCI may use the data to analyze trends in order to propose other services to its Clients, such as new events or other services.
- f) Technical data: MCI, or third parties instructed by MCI, evaluate this data purely for statistical purposes and only in an anonymised form, in order to optimize MCI's website and increase user-friendliness, efficiency and safety. MCI may in particular use technical data to measure the success of MCI marketing campaigns, compile statistics about MCI website usage and response rates, and use aggregated personal data calculate the percentage of MCI users who have a particular telephone area code.
- g) Other purposes: MCI may use your data as MCI believes to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce MCI's terms and conditions; (e) to protect MCI's operations; (f) to protect MCI's rights, privacy, safety or property, you or others; and (g) to allow MCI to pursue available remedies or limit the damages that MCI may sustain.

MCI will ask your consent before using data for a purpose other than those that are set out in this Privacy Policy subject to mandatory laws.

#### **4. Duration of storage**

General and personal data will be kept by MCI only as long as reasonably necessary taking into consideration its need to answer queries or resolve problems, to provide improved and new services and to comply with legal requirements under applicable laws or with inquiries from Clients on past events or travel



activities. MCI will retain general and personal data as long as you have an MCI account and for a reasonable period of time after you cancel/delete your MCI account. You may cancel/delete your MCI account by sending an email to [privacy@mci-group.com](mailto:privacy@mci-group.com)

## 5. Location of storage and controller of data base

The Contact Profiles that MCI maintains are stored in a cloud-based central database at a third party provider's location in Switzerland. The purpose and content of MCI's central database are determined by MCI Switzerland.

## 6. Your duties

You must ensure that the data you provide us with are:

- correct
- accurate;
- current;
- truthful; and
- compliant with any applicable laws.

In particular, since MCI will mainly use email communications with you, you are required to notify us of any modification of your email address. Alternatively, you can directly update your Contact Profile.

## 7. Transfer and communication of data

### 7.1 In general

MCI is a worldwide company with offices in over 30 countries across Europe, the Americas, Asia, the Middle East and Africa. Your personal data may therefore be transferred to and outside of Switzerland, including in countries whose data protection laws may be different from, and less stringent than, those in your country of residence. **You hereby agree and give your consent to MCI to transfer and communicate your data as follows:**

- a. *Transfers within the MCI group:* Transfers are made throughout MCI and its subsidiaries to support its activities and/or services. MCI and its subsidiaries are bound by Binding Corporate Rules which regulate the use of your data as set out above.
- b. *Transfer to third parties:* MCI works with certain third parties to obtain support services in connection with travels, meetings and events services and/or other MCI services to its Clients, such as emergency online booking services, hotel booking services, ground transportation requirements or airline ticket issuance and, in some cases, personal data will be shared with these third parties in order to pursue MCI's mission and goals. MCI may also transfer personal data to third parties at



the request of its Clients. For example, for data consolidation or emergency tracking services. MCI may transfer your data to third parties for promotion and marketing purposes as outlined under 3e) above. MCI may also transfer your data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of MCI business, assets or stock (including in connection with any bankruptcy or similar proceedings). Prior to a transfer, third parties (except for travel suppliers and authorized transfers such as within the EU) are required to sign a data transfer agreement with MCI that requires them to follow the applicable data protection laws.

- c. Regulatory transfers: MCI may be required by law to transfer data to governments and regulatory and/or supervisory authorities.

#### ***1.1. Electronic transfer of data***

If you visit MCI's website your data will be transported via an open publicly accessible network. The data might therefore be transmitted across national borders even if you and MCI are located in Switzerland. This involves notably the risk that your data may be intercepted and read by third parties, allowing such third parties to infer an already existing or future business relationship between you and MCI.

Furthermore, you are notified that information you transmit or allow to be transmitted to you by MCI via an electronic medium, in particular via e-mail, SMS, contact forms, etc. are usually unencrypted and therefore neither confidential nor secure. Even in the event of an encrypted transmission, sender and recipient remain unencrypted in each case. Third parties may therefore be able to infer an existing or future business relationship between you and MCI.

If you provide MCI with personal information, your personal data may be transferred by MCI to countries whose data protection laws may be different from, and less stringent than, those in your country of residence as set forth above. Your personal data may in particular be transferred to the United States. You are hereby notified that your personal data might be accessed by governmental authorities in such countries (in particular by US authorities).

### **8. Security and organizational measures**

To ensure the safety of your data on MCI's website and systems, MCI has implemented appropriate technical, contractual, administrative, physical and organizational measures to protect your personal data from loss, destruction, unauthorized access, accidental or unlawful disclosure and manipulation. These measures are subject to continuous development in accordance with technological progress and are periodically reviewed to comply with all applicable privacy laws. However, we cannot and do not guarantee the security of your personal data and therefore cannot assume any liability in this respect.



Only authorized MCI staff, third party companies' (i.e. service providers) staff or our Clients' authorized staff (who have contractually agreed to keep all information secure) have access to your personal data. All MCI staff who have access to your personal data are required to adhere to the staff confidentiality regulations and all third-party employees who have access to your personal data have signed non-disclosure agreements. In addition, data transfer agreements are in place with third-party companies that have access to your personal data to make sure these data remain secure.

#### **9. Choice, access, update and deletion of data**

You have a right of access to your personal data. You can update your Contact Profile on the following link: <http://bcom.psideo.com>. To contact MCI with questions or issues about MCI's data processing, you should contact the Data Protection Officer at the following e-mail address: [privacy@mci-group.com].

MCI gives you many choices regarding MCI's use and disclosure of your personal data for marketing purposes. By contacting the Data Protection Officer at the above mentioned e-mail address, you may opt-out from receiving future electronic marketing messages from MCI and request that we not share your personal data with unaffiliated third parties for their marketing purposes. MCI will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out as described above, MCI will not be able to remove your personal data from the databases of unaffiliated third parties with which MCI has already shared your personal data (i.e., to which we have already provided your personal data as of the date that we implement your opt-out request). Please also note that if you do opt-out of receiving marketing-related messages from MCI, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

Under certain conditions you also have the right to have your personal data that is stored by MCI blocked and deleted, unless MCI has to keep these data for legitimate business or legal purposes. For more information, you should contact the Data Protection Officer at the above mentioned e-mail address.

#### **10. Changes**

This Privacy Policy may be revised and updated by MCI from time to time to comply with statutory data protection and privacy laws. MCI will post any privacy policy changes on its website and, if the changes are significant, MCI will send a notice to the e-mail address provided in your Contact Profile.

#### **11. Contact**

If you need further assistance, please contact MCI at [privacy@mci-group.com] or by visiting MCI's website and clicking on "Contact Us" to submit your inquiry.