

CEM Benchmarking

Privacy Policy

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1. Outline

This Privacy Policy sets out how CEM Benchmarking Inc. (CEM) manages personal data.

For this purpose, ‘client’ refers to:

- Clients of CEM
- Potential clients of CEM
- Vendors
- Third parties such as industry bodies

In respect of the processing of your personal data in line with this Privacy Policy, CEM acts as a controller for the personal data and complies with the associated requirements as laid out under the General Data Protection Regulation (GDPR) and other data protection laws and regulations. The controlling entity will be CEM Benchmarking Inc.

2. Categories of personal data

When we refer to “personal data” we mean any data relating to an identified or identifiable individual. This could include information that could identify an individual, directly or indirectly, in particular, by reference to an identifier such as a name, ID number, location data or online identifier. It also includes factors specific to an individual’s characteristics.

CEM Benchmarking collects limited personal data on its clients and potential clients; and this primarily encompasses the following types of information:

- contact and organisation related material such as an individual’s work email and business role;
- business communications, such as email exchanges or summaries of telephone calls or meetings.

3. Sources of personal data

We collect your personal data during the course of your dealings with us. For example, when you engage with us to supply benchmarking information. Otherwise, we gather information about you when you provide it to us, for example when you correspond with your contacts within CEM.

We may also receive information about you from other sources, such as directly from your organisation or via online and other publicly available sources. We combine

information about you from various sources, including the information that you have provided to us directly.

4. Purposes

CEM collects client personal data for the following purposes:

- to manage past, current and future business engagements;
- to send information such as proposals, reports, research and event invitations;
- direct marketing communications; and
- to comply with any legal or regulatory obligations.

5. Lawful basis

CEM collects, uses, processes and discloses personal data in accordance with applicable data protection and privacy laws. We process personal data on the following bases:

- for legitimate business purposes, including ensuring that CEM is able to maintain its relationships with existing clients, manage past, current and future client relationships and to promote its services and products;
- for the delivery of benchmarking services as agreed with our clients;

6. Data recipients

Your personal data may be shared with CEM's subsidiaries, and with certain third parties such as:

- service providers that provide services on our behalf, including IT service providers;
- legal and other professional advisors and auditors; and
- regulators and law enforcement agencies.

Where third parties are given access to your personal data, CEM will take the required contractual, technical and organisational measures to ensure that your personal data is only processed to the extent necessary.

7. Third country transfers

CEM maintains personal data outside of the EEA (specifically in Ontario, Canada), where data protection laws may not offer the same level of protection available in your home country.

When we transfer your personal data to any CEM affiliates based outside the EEA or any country considered "adequate" by the European Commission, we rely on an intra-group

transfer agreement that incorporates EU Standard Contractual Clauses designed to protect your personal data. You may obtain information and a copy of the relevant mechanism relied on for the transfer of your personal data by emailing us at johns@cembenchmarking.com.

8. Retention period

CEM will only hold your personal data for as long as required to undertake the purposes of our processing, plus a prescribed period of time as required by national laws in your jurisdiction.

We hold personal data about our clients for the following periods:

- Data relating to prospective clients will be retained for up to five years, after which the record will be deleted if there is no recorded contact between CEM Benchmarking and the prospective client or the prospective client has asked to be deleted within this period;
- Data relating to clients will be retained for the duration of the client relationship plus a further period to comply with certain obligations, legal requirements and best practices.

We will also retain your personal data for as long as necessary in connection with legal action or any investigations involving CEM.

9. Individual rights

Individuals may have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, if your personal data is processed by CEM in respect of our client relationship activities, you may have the following rights:

- to receive confirmation from CEM as to whether we process your personal data, and where we do, access to that personal data and certain other information;
- to request the rectification of any inaccurate personal data that we hold about you;
- to request the erasure of your personal data in certain circumstances;
- to request the restriction of our processing of your personal data in certain other circumstances, for example in certain scenarios where we are unable to comply with a request to erase your personal data;
- to receive a copy of the personal data that you have provided to CEM in a structured, machine-readable and commonly-used format and/or, where possible, to request we transmit that personal data to another organisation;
- to object to certain processing of your personal data and to automated decision making and where our processing is based on your consent, you have the right to withdraw consent at any time by contacting us.

Where you are given the option to share your personal data with us, you can always choose not to do so. If you object to the processing of your personal data, we will respect that choice in accordance with its legal obligations. This could mean that we are unable to perform the actions necessary to achieve the purposes of processing described above.

10. Right to lodge a complaint with a supervisory authority

Under the GDPR, individuals have the right to lodge a complaint with their local data protection authority or the Information Commissioner's Office, which is CEM's Lead Supervisory Authority in the European Union.

Information about reporting a complaint to the ICO can be found at <https://ico.org.uk/concerns/>.

A list of EEA data protection authorities by jurisdiction is available at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

11. Contact us

Please feel free to contact CEM if you have any questions about this Privacy Policy or any of CEM's practices in relation to your personal data. Clients should direct requests to their primary contact at CEM Benchmarking in the first instance, whether this is to seek further information or to exercise any of your statutory rights.

You can contact us by emailing johns@cembenchmarking.com