



## **Notice of Privacy**

### **ABA Privacy Policy**

**August 23, 2018**

This privacy policy tells you about the information we may collect from you when you engage with ABA. It is designed to be in compliance with the principles and provisions espoused in all applicable federal, state and international data protection laws including the EU General Data Protection Regulation (GDPR). In collecting this information, we are acting as a data controller and are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

#### **Who are we?**

We are the American Bus Association (ABA). Our office address is ABA, 111 K St, NE, Suite 900, Washington, DC 20002. You can contact us by post at the above address, or by email at [abainfo@buses.org](mailto:abainfo@buses.org).

Any inquiries about our use of your personal data should be addressed to the contact details above.

#### **Why do we collect your information?**

To fulfill our purpose and deliver value to our members, ABA collects and processes certain information from its members, partners, business contacts, collaborators, event delegates and other stakeholders in the field of activity of ABA. We collect this information for contractual reasons (i.e. of members and suppliers), or to fulfill our legitimate interest as an association.

#### **How we collect personal data**

##### **Personal Data that you give us**

We may collect and process the following Personal Data:

- **Contact information**, which you provide when corresponding with us by phone, e-mail or otherwise. This includes information you provide when you participate in discussion boards or other social media functions on our Site and when you report a problem with our Site. The information you give us may include your name, address, e-mail address, phone number, financial information and/or credit card information.
- **Membership information**, about your membership including your name, contact details such as address, phone number and email address (business or personal), age, job title, government

identification numbers (e.g. social security number, passport number etc.), year of admission and any other information related to your membership. Membership information may be provided by you during the registration process, or by your employer on your behalf.

- **Due payment information**, including financial information such as credit/debit card and account numbers used to register or renew your membership.
- **Purchase information**, relating to purchases made by members and non-members of delegate passes and event participation, books, reports, journals or newsletter subscriptions either in-person or via our Site. Purchase information will include financial information as well as information concerning the content and time of the purchase.
- **Disciplinary information**, relating to ethics/disciplinary programs in which complaints against members are adjudicated, with the result being possible suspension/expulsion from membership. This may include extensive information about a member's business or professional activities, including employment information, and similar information relating to other individuals involved in the investigation, though would usually not include financial information.
- **Certification information**, relating to certification programs, in which members are granted certification if they meet specified educational/employment experience requirements and/or pass an exam. This may include extensive information about the experience/performance of those certified or accredited. Where the certification concerns institutions or businesses, this may include similar information identifying employees and other members of staff including volunteers.

### **Personal data we collect from you**

With regard to each of your visits to the Site we will automatically collect the following information:

- **Technical information**, including the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- **Information about your visit**, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and
- **Location information**

### **Personal Data we collect from others**

We may receive information about you from publicly available and third-party databases or services that provide information about business people that we believe will help us identify provide products and services that may be of interest to you. We will obtain your consent before contacting you if required by the law of the country in which you are located.

### **Non-Personal Data**

We collect information that is sent to us automatically by your web browser and we may use this information to generate aggregate statistics about visitors to our Site, including, without limitation:

- IP addresses
- Browser type and plug-in details
- Device type (e.g., desktop, laptop, tablet, phone, etc.)

- Operating system
- Local time zone

We may use non-Personal Data for various business purposes such as providing customer service, fraud prevention, market research, and improving our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

### **How we use your Personal Data**

We will only process your Personal Data, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party, (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

### **Personal Data that you give us**

We may use Personal Data that you provide directly to us for the following purposes:

- to carry out our obligations arising from your membership, or any other contract entered into between you and us and to provide you with the information, products and membership services that you request from us;
- to organize events that you have purchased or registered for, and to provide you with information, and other materials, relating to the content of the event, the speakers, sponsors and other attendees;
- to provide our newsletter and other publications, provided you have given your consent;
- to respond to your questions and provide related membership services;
- to provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- to provide you, or permit selected third parties to provide you, with information about events, products or services we feel may interest you, provided you have given your consent;
- to transfer your information as part of a merger or sale of the business;
- to notify you about changes to our membership service; and
- to ensure that content from our Site is presented most effectively for you and your computer.

### **Information we collect about you**

We will use Personal Data that we have collected about your use of our Site:

- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Site to ensure that content is presented most effectively for you and your computer;
- as part of our efforts to keep our Site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and

- to make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them.

### **Personal Data we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Data for the purposes set out above (depending on the types of information we receive).

### **Sharing Your Data**

When you signed your membership application you agreed to the notice on the application which states that ABA rents its mailing list to ABA members and includes company email addresses. If you do not wish your address or email address included, please notify ABA at [abainfo@buses.org](mailto:abainfo@buses.org).

### **Your Rights as a Data Subject**

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate.

- If we have asked for your consent to process your personal data, you may withdraw that consent at any time.
- If we are processing your personal data for reasons of consent or to fulfill a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.
- If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.

You have the option to opt out of your data being shared with other ABA members or the public by opting out of the ABA public directory.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above.

### **Your Right to Complain**

If you have a complaint about our use of your information, we would prefer you to contact us directly via [abainfo@buses.org](mailto:abainfo@buses.org) in the first instance so that we can address your complaint. Secondly, if we cannot resolve the complaint together, we would propose that the complaint be taken to independent arbitration. However, if you remain unsatisfied with the way your information has been used and no satisfactory resolution can be reached via either of the processes above, you may also complain to the Federal Trade Commission using the form at the following link:

<https://ftccomplaintassistant.gov/Company#crnt>.

### **Updates to This Privacy Policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.