

Global Cinema Federation Privacy Policy

This policy sets out the basis on which any personal data we collect from Global Cinema Federation (GCF) members and various partners will be processed. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

What does this Privacy Policy cover?

The Global Cinema Federation respects your privacy and is committed to protecting your Personal Data. We want to be transparent with you about how we collect and use your Personal Data. This Privacy Policy sets forth our information gathering and dissemination practices and is intended to meet our duties of transparency under the “General Data Protection Regulation” or “GDPR”.

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Who we are and how to contact us

The Global Cinema Federation is the Controller (for the purposes of the GDPR) of your Personal Data (referred to as either “**GCF**”, “**we**”, “**us**” or “**our**” in this Privacy Policy), a non-profit organisation.

You can contact us by email: communications@globalcinemafederation.org.

The GDPR requires us to appoint a “Data Protection Officer”. This is a person who is responsible for overseeing and advising us in relation to our compliance with the GDPR (including compliance with the practices described in this Privacy Policy). If you want to contact our Data Protection Officer directly, you can email: communications@globalcinemafederation.org

Your rights relating to your Personal Data

By law, you have the right to:

- **Request access to your Personal Data.** This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;
- **Request correction of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it;
- **Object to processing of your Personal Data.** This right exists where we are relying on a Legitimate Interest as the legal basis for our processing and there is something about your particular situation that makes you want to object to processing on these grounds;

- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer of your Personal Data.** We will provide you, or a third party you have chosen, with your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you;
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data.

How to exercise your rights

If you want to exercise any of the rights described above, please contact us at communications@globalcinemafederation.org

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your Personal Data, please contact us at: communications@globalcinemafederation.org

We will reply to your complaint as soon as we can.

Communications preferences

You can ask us to stop sending you messages at any time by contacting us at communications@globalcinemafederation.org

What Personal Data we collect

All the Personal Data we collect, both from you and from third parties about you, is outlined below.

The GDPR definition of Personal Data can be found [here](#). Essentially, it refers to information about an individual, from which that individual is either directly identified or can be identified.

It does **not** include “anonymous data” (i.e., information where the identity of individual has been permanently removed).

However, it **does** include “indirect identifiers” or “pseudonymous data” (i.e., information which alone does not identify an individual but, when combined with certain additional and reasonably accessible information, could be attributed to a particular person).

This Policy applies to our website, our newsletters, our members lists, our partners lists, our events lists, our policy contact lists, our industry contact lists and to all the services offered by GCF, including all personal information such as, but not limited to, your e-mail address, first name, last name, postal code, professional, mobile and/or home telephone number, whether manually or digitally processed (the “Personal Information”).

Members, partners and other stakeholders

We collect your contact details such as your first name, last name, address (including office number when relevant), e-mail address, telephone number, mobile phone number, fax number. Also, through the use of our website, social media, e-mail responses, newsletters, cookies, clicking data, navigation data and other technologies, we can collect data about you. For suppliers or companies with which we can start a form of cooperation, we also keep, other than the data mentioned above, company data such as VAT numbers or enterprise numbers, the coordinates of contact persons of the legal entity (name, function, telephone ...) as well as of the associates, partners in the business.

If you use our website, we will collect (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the website or use our services.

No Special Categories of Personal Data

We do not collect any “**Special Categories of Personal Data**” about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we use your Personal Data and why

We will only use your Personal Data for the purposes for which we collected it as listed below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

We may use the information described above to:

- contact and provide services to you
- send you newsletters, press releases, statements, publications and other communications
- communicate with you about, and administer your participation in, events
- respond to your enquiries
- perform data analyses

If we need to use your Personal Data for an unrelated purpose, we will update this Privacy Policy and we will explain the legal basis which allows us to do so.

What is our “legal basis” for processing your Personal Data?

- (1) *Contractual necessity* – this means the use of Personal Data for a Purpose is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (2) *Necessity to achieve legitimate interests* – this means the use of Personal Data for a purpose is: (a) necessary to achieve legitimate interest; and (b) those legitimate interests are not overridden by the relevant individual’s interests, rights and freedoms.
- (3) *Compliance with Law* – this means your use of the Personal Data for a particular purpose that is necessary to comply with either a legal or regulatory obligation. Given its limited scope, this

is not likely to form the basis of many core operational/commercial functions. However, it may apply in the context of certain regulatory (eg, Tax) reporting requirements.

- (4) *Data Subject Consent* – GDPR consent is a very high bar. It requires freely-given, specific (i.e., per purpose), fully-informed, unambiguous, demonstrable and withdrawable consent. Accordingly, a different legal basis should be found for processing Personal Data if possible. If you consider consent to be the most relevant legal basis for a particular purpose, we recommend you contact a member of the Cooley Data Privacy team to discuss further.

Generally, we do not rely on your Consent as a legal basis for using your Personal Data.

What happens when you do not provide necessary Personal Data?

Where we need to process your Personal Data either to comply with law or to perform the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

Personal Data from Third Party Sources

In addition to the Personal Data that we collect directly from you (as described in the section immediately above), we also collect certain Personal Data from third party sources such as social media and public websites.

How we use cookies & other tracking or profiling technologies (our website & newsletters)

We may collect information about your computer including, where available, your IP address, operating system and browser type for system administration and to report aggregate traffic. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences
- to speed up your searches

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings”, “help”, “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Who we share your Personal Data with

We do not disclose personal information we obtain about you, except as described in this Privacy Policy. We may share personal information with service providers who perform services on our behalf based on our instructions. We do not authorise these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government entities based on a lawful disclosure request, or (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

How we keep your Personal Data secure

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your Personal Data to employees and other staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

We have put in place procedures to deal with any actual or suspected Personal Data breach. In the event of any such a breach, we have systems in place to work with applicable regulators. In addition, in certain circumstances (e.g., where we are legally required to do so) we may notify you of breaches affecting your Personal Data.

How long we store your Personal Data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.