

# Infrastructure Masons

## Privacy Policy

*Effective Date: February 4, 2020*

*Last Updated: February 4, 2020*

Infrastructure Masons, Inc. (“**iMasons**,” “**we**,” “**our**,” or “**us**”), respects your privacy and is committed to protecting it in accordance with this policy.

This policy outlines the way in which we manage any personal data obtained through <https://imasons.org/> (the “**Website**”) or otherwise provided by or about individuals (“**you**”, “**your**”) in the course of you becoming or participating in iMasons as a member, attending or participating in our events, or subscribing to our mailing list (collectively, the “**Activities**”).

This policy explains:

- What personal data we collect about you in the course of your engagement with the Activities, why we collect it, who it goes to and how long we keep it for;
- How we use your personal data;
- How we protect your personal data; and
- Your legal rights with respect to your personal data, including how to access and update the information we hold about you.

Please note that some of the provisions herein will only apply if you are based in the EU.

The relevant sections of the policy are listed below:

- About us
- What information do we collect about you?
- Why do we collect your personal data and on what grounds?
- Marketing communications
- Who do we share your information with?
- Will my data be sent abroad?
- How long do you keep my personal data?
- Your rights with respect to your personal data
- Cookies and other technologies
- “Do Not Track”
- Third party links on the Website
- Children’s Privacy
- Changes to this policy
- Contact us

By continuing to use the iMasons Website and engage in the Activities, you acknowledge that you have read this policy and understand how we will process your personal data as described herein.

## About Us

For the purposes of applicable data protection laws, Infrastructure Masons, Inc., with its principal address at 3855 SW 153<sup>rd</sup> Drive, Beaverton, OR 97003 USA is the controller of your data. This means that we are the primary entity who decides the purposes and means for dealing with your personal data.

### **Important: Working Groups**

Although we are headquartered in the US, iMasons is a global membership organization operated through various Working Groups which are run by our members. This means some of your personal data (primarily your member profile and the data you have provided) may be shared with the iMasons community.

## What information do we collect about you?

We collect several types of information from and about our members, Website users, participants, and e-mail subscribers, including:

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

- Information required to sign up for and administer your membership, including your name, address, employer or company name, job title, LinkedIn profile URL, phone number, and e-mail address. If you elect to join iMasons at a membership rank or level other than a “Member at Large”, in order to help us determine the appropriate membership level, we will also ask you to respond to a series of questions related to our membership categories based on your professional experience. These categories are described in greater detail on the Membership page of the website.
- Information you provide to us when you apply for a scholarship from iMasons, including your name; contact information including your address, phone number, and e-mail address; gender; professional, academic, military service, and/or life achievements and records; and financial need.
- Information provided to us if you contact us or make an inquiry, such as records and copies of your correspondence (including e-mail address(es)) if you contact us electronically.
- Information we receive from you when you sign up for iMasons events, including your name, e-mail, LinkedIn profile URL, any dietary restrictions (for “Food for Thought” events only), and financial and transaction data (e.g. payment card details).
- Information you provide to us directly, or indirectly when you connect or engage with us via social media platforms such as Facebook, Twitter, YouTube, or LinkedIn (“**Social Media Platforms**”).

- Information that may pertain to you but does not identify you individually, such as iMasons events you have registered for and iMasons Working Groups, functions, or offerings you participate in, including those available through our mobile app.

**Information received from other sources:**

- Technical information regarding your use of the Website including, but not limited to, information about your internet connection, the equipment you use to access our Website, traffic data, location data, weblogs and usage data.
- Publicly available details, such as contact details or other personal data on your personal website or that is publicly viewable on your Social Media Platforms.
- Information provided about you by a third party in connection with a membership application, membership agreement, membership profile or status, or event registration, which may include your contact information.
- Any relevant personal data that you may have submitted to our service providers in the course of their providing services to support our Activities.

You may also provide information to be published or displayed (hereinafter, "**posted**") on areas of the Website, our service provider websites (including the member collaboration platform) and Social Media Platforms that are visible to other Website users, members, and participants in Working Groups that you participate in (collectively, "**User Contributions**"). Your User Contributions are posted online and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, although our members and service providers are bound by confidentiality provisions, we cannot control the actions of our members, Website users or service providers with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

## **Why do we collect your personal data and on what grounds?**

We will only use your personal data if we have a permitted lawful basis to do so. Generally, we collect your personal data because it is necessary for:

- **Performing our contract** with you, or responding to your requests or inquiries, related to the Activities;
- The pursuit of our **legitimate interests** (as set out below); or
- Complying with our **legal obligations**.

We may also rely on **your consent** to use your personal data for:

- Keeping you informed of iMasons events, work products, and offers, e.g. through individual Working Group e-mails and other notification activities (see "Marketing Communications" below).

You have the right to withdraw your consent to these activities at any time, which will mean (unless another lawful basis applies to your data) that we will cease to process the affected data after consent is withdrawn. However, please note this may result in us being unable to provide you with certain features of the Website and/or Activities.

The primary purpose for which we collect information about you is to support the Activities you engage in with us. We also collect information about you for the following purposes:

#### **To perform our contract with you, or provide requested services to you**

- To provide members with their membership benefits
- To process your communications, your membership of, and subscription to, the Website, and to enable your use of the Website and the Activities
- For making the Activities available to you
- For continuity of service, (e.g. to restore your membership if you are coming back after a long break). This will be in accordance with our data retention practices (see “How long do you keep my personal data?” below)
- To provide you with information or services that you request from us
- For handling member contacts, questions, complaints, or disputes

#### **For our legitimate interests**

- For research and analytical purposes, e.g., to improve our understanding of membership, inquiries, and event attendance trends and profiles
- For improving existing Activities and developing new events and services
- For promoting, marketing, and advertising our Activities
- For protecting iMasons and its members by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to iMasons
- To effectively handle any legal claims or regulatory enforcement actions taken against iMasons
- To generally run the Website and for internal operations, in order to provide you with an up to date, efficient and reliable service
- For making important communications about your membership
- For maintaining our membership database

#### **To comply with our legal obligations**

- To help prevent fraudulent activity, including on your account (for example, if we collect your card details we will check these details with credit agencies and reserve the right to refuse to make available the Website and/or our Activities if, for example, the card details provided are reported to be fraudulent or credit agencies report the activities as being fraudulent)
- To comply with our legal and regulatory obligations (including under applicable data protection laws)
- For preventing, investigating and detecting crime, fraud or anti-social behavior and prosecuting offenders, including working with law enforcement agencies
- To fulfil our duties to our members

## Marketing Communications

If you have consented to receive marketing messages about our publications, events, and services, we will use information you provide to send you such messages. If you do not want us to use your information in this way, please check the relevant box available at the time we notify you when and where we collect your data. If you have previously consented to receive marketing messages, you may revoke your consent by adjusting your user preferences in your account profile or clicking on the “unsubscribe” link at the bottom of any marketing message. Please note that you may not opt out of receiving messages that are transactional in nature rather than marketing messages (e.g., messages about your membership).

## Who do we share your information with?

We may disclose aggregated non-personal information about our members and Website users. This is information collected in pursuit of our legitimate interests, such as through website analytics, surveys, and event attendance, for example. This is information that does not identify you or any individual.

We may disclose personal data that we collect or you provide as described in this privacy policy with the following third parties:

- Contractors, service providers, and other third parties we use to support the Activities and our organization, and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them.
- Third parties we may be required to disclose such personal data to in order to comply with our legal obligations or enforce our legal rights, e.g. any relevant authority or enforcement body and fraud protection and credit risk reduction agencies.
- Any potential or actual third party buyer of our operations and/or assets in the event that we sell, trade or license ownership of any part of the iMasons organization or assets (including management of the Website).

## Will my data be sent abroad?

As our website and contacts database are based and hosted in the US, any personal data you submit to us will be held in the US. Additionally, iMasons members are based in multiple different countries and may be affiliated with multiple, cross-border Working Groups.

**If you are based in the EU**, this means your personal data may be transferred outside of the European Economic Area to another jurisdiction. Where this is the case and we are responsible for making such a transfer, we will ensure that these are made subject to appropriate safeguards as required by applicable data protection laws, to ensure that a similar degree of protection is afforded to your personal data. These may include the use of EU Commission approved standard contractual clauses or transfers to countries deemed to provide an adequate level of protection for personal data by the European Commission. You can obtain further information about the safeguards in place for your international transfers of personal data by contacting us at [admin@imasons.org](mailto:admin@imasons.org).

## How long do you keep my personal data?

We keep your data for as long as necessary to meet the relevant purposes for which we have collected your data, including for the purpose of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate length of time for holding your 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 purpose for which we process your data and whether we can achieve those purposes through other means, along with the applicable legal requirements.

Details of retention periods for different aspects of your personal data will be available and can be requested from us by contacting us at [admin@imasons.org](mailto:admin@imasons.org).

In some circumstances you can ask us to delete your data: see “Your rights in respect to your personal data” below for further information.

## Your rights with respect to your personal data

**The following section applies only if you are based in certain jurisdictions.**

Depending on the jurisdiction in which you reside, you may have rights under local data protection laws in relation to the personal data we hold about you. Such laws may grant you the right to request to:

- Access information held about you.
- Correct any incorrect or incomplete data we hold about you. It is in both our interest and yours that any personal data we hold about you is accurate, complete, and current. If the data we hold about you is inaccurate in any way, please contact us to have your personal data corrected. You can update any incorrect contact information yourself by contacting [admin@imasons.org](mailto:admin@imasons.org) or accessing the member system.
- Delete, restrict, or remove the data we hold about you.
- Transfer the data we hold about you to another party.
- Object to any further processing of your data.

You can make all such requests via e-mail to [admin@imasons.org](mailto:admin@imasons.org).

We will attempt to respond to your requests within one month and free of charge. Please note that in respect of all these rights, we reserve the right to:

- Refuse your request based on the exemptions set out in the applicable data protection laws,
- Require verification of your identity to process the request or request further information, and

- Charge you a reasonable administrative fee for any repetitive, manifestly unfounded or excessive requests.

If we refuse your request to exercise these rights, we will provide reasons for our refusal and allow you to challenge our decision.

If you have any concerns about how we handle your data, please contact us at [admin@imasons.org](mailto:admin@imasons.org). If you are not satisfied after we have tried to resolve your issue, you will be entitled to lodge a complaint with the data protection regulator for your country of residence.

### **Security of your data**

We have put in place commercially reasonable security measures to protect your personal data from theft, accidental loss, or unauthorized use, access, alteration, or disclosure. In addition, we use reasonable means to limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need for access in order to perform their duties with iMasons. They will only process your personal data in accordance with our instructions, and they are subject to a duty of confidentiality.

In the event of a confirmed cybersecurity incident resulting in the unauthorized access or acquisition of your personal data stored by iMasons, we will notify you and any applicable regulator of a breach where required by applicable law.

## **Cookies and other Technologies**

As with many websites, the Website uses “cookies” and other website analytics tools to gather and store information about visits to the Website. We use cookies in order to store and manage user preferences, enable content, and gather analytic and usage data. The use of cookies can help us to distinguish you from other users of the Website and assist your use of certain aspects of the site. Some cookies and other technologies may serve to recall personal information previously indicated by a visitor to the site. Most websites and applications that collect information about your online activities use cookies or other tracking technologies. More information about our use of cookies on the Website, and how you can control and manage cookies, is below.

Most browsers allow you to refuse to accept cookies and to delete cookies, though the methods for doing so may vary from browser to browser. You may be able to set your browser to notify you if you receive a cookie, or your browser may enable you to block cookies altogether. Information about managing cookies in commonly used browsers is available online from [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that if you choose to erase or block your cookies, you will need to re-enter your original account credentials to gain access to certain parts of the Website.

### **Types of Cookies And Why We Use Them**

There are two types of cookies: Session-based and persistent. Session cookies exist only during one session, and they disappear from your computer or device when you close your browser software or otherwise end your session. Persistent cookies remain on your computer or device after you close your browser or otherwise end your session.

The Website uses session cookies to provide us with information about the Website features used and activities conducted while you are using the Website. It also uses session cookies to help process information you input into the Website. The Website uses persistent cookies solely for remembering any preferences or choices you make regarding your use of the website, including your cookie settings.

There are four general categories of cookies. A description of each category of cookie is below, followed by a table describing the categories of cookies used on the Website.

- **Strictly necessary cookies.** These cookies are essential to enable you to move around a website and use its features. Without these cookies, services you have asked for, like logging into a secure area of our Website, cannot be provided.
- **Performance / analytical.** These cookies collect information about how visitors use a website. The information collected by these cookies is performance and usage data such as that collected by Google Analytics as described throughout this Privacy Statement.
- **Functionality cookies.** These cookies allow a website to remember choices you make (such as your username or ID, language preference, or the area or region you are in) and provide enhanced, more personal features. They may also be used to provide services you have asked for. The information these cookies collect may be anonymized, and they cannot track your browsing activity on other websites.
- **Targeting and advertising cookies.** These cookies track browsing habits and are used to deliver targeted (interest-based) advertising. They are also used to limit the number of times you see an ad and to measure the effectiveness of advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organizations, such as advertisers.

We use the following categories of cookies for the reasons described below:

Category	Do we use?	Purpose and Description
<i>Strictly Necessary</i>	Yes	We use these cookies to enable you to navigate the Website and use certain features, including logging in to and using the member portal.
<i>Performance</i>	Yes	We use these cookies to improve the performance of our Website and enhance your experience. Google Analytics automatically collects certain usage and performance data from our Website users. The information these cookies collect is aggregated and anonymous information, and we are never provided with your personal information from these cookies.
<i>Functionality</i>	Yes	Functionality cookies enable the Website to temporarily remember choices you make on the Website, and to provide a more personalized experience. You can customize or disable these cookies through your browser settings. A link to cookie management resources for commonly used browsers is above.
<i>Advertising</i>	No	We do not use any advertising, targeting, or marketing cookies on our Website.

## **Our Use of Google Analytics**

When you visit the Website, Google Analytics automatically collects information from you through the use of Google's analytics IDs, and Google provides some of this information to us. An analytics ID is a specific string of numbers and letters (often called a "character string") that is assigned to your computer or device but does not name you. The analytics ID allows Google to track usage data of the Website, such as date and time of visit, duration of visit, Website traffic patterns, "clickstreams," other similar information about your use of the Website, the type of web browser used, the operating system/platform you are using, your IP address, the websites that referred or linked you to our Website, and your CPU speed. Google Analytics does not share the analytics ID assigned to your computer or device that you use to access and use the Website. Google Analytics provides information about the use of our Website to us in aggregate form (*i.e.*, data about many Website users combined and not just about you). Some of this data might include the geographic region of groups of Website users, but again, this data will be in aggregate form. We rely on this aggregate data to inform us how users are using the Website to help us improve the Website.

### **"Do Not Track"**

The Website does not track your online activities over time and across third-party web sites or online services, and so does not respond to browser "Do Not Track" signals. As described below, the Website may contain links to other websites not owned or operated by iMasons. These websites may set cookies that obtain information about the fact that a web browser visited the Website from a certain IP address. These websites are not authorized to collect any other personal data from the Website unless you provide it to them directly.

## **Third Party Links on the Website**

The Website may contain links to other websites not owned and operated by iMasons, for example, Social Media Platforms and service provider websites. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Children's Privacy**

We do not knowingly collect personal data from children under the age of 16. If we learn that we are in possession of personal data collected from a child under the age of 16, we will immediately delete that information from our systems.

## **Changes to this Policy**

We may from time to time review and amend this Privacy Policy to take into account changes in law, technology, and our operations. We will post any changes to this Privacy Policy on the Website from time to time and, where appropriate, notify you by e-mail. Please periodically review this Privacy Policy before using the Website as continued use of the Website shall indicate your acknowledgment and understanding of any changes. All personal data held by us will be governed by the most recent Privacy Policy posted on the Website.

## Contact us

If you have any queries relating to this privacy notice (including any requests to exercise your legal rights with respect to your data), you can contact us by e-mail at [admin@imasons.org](mailto:admin@imasons.org).