

# Association of International Certified Professional Accountants *Supplier and Contractor Privacy Notice*

Effective 19 July 2018

Version 1

## **Overview**

As part of our procurement process, we at times need to collect and process Personal Data from our suppliers and contractors. This Privacy Policy describes the ways in which your Personal Data is collected and used by the Association of International Certified Professional Accountants (the Association), the Chartered Institute of Management Accountants (CIMA), and the American Institute of CPAs (AICPA) (collectively referred to herein as “the controllers”, “we”, “us”, “our”). By providing your Personal Data to any of the controllers, you acknowledge and agree that your data may be shared between and/or processed by any of the three controllers.

It is your responsibility to review and understand this Privacy Policy prior to providing your Personal Data to us. If you do not accept and agree to the Privacy Policy, please refrain from providing your Personal Data to us.

## **Collection of Personal Data**

We collect and process Personal Data from suppliers and contractors through the supplier setup process. We may collect information from you such as, but not limited to, your name, email address, mailing address, phone/fax numbers, date of birth, company/employer information, tax information such as your Taxpayer ID or Tax Registration number, and bank account information (“**Personal Data**”). You are not required to provide us with all of the Personal Data listed above, but if you do not do so, we may not be able to effectively enter into a contract with you.

See “Use of Information” section below for details regarding the ways that we use and process your Personal Data.

## **Use of Information**

Your Personal Data may be used in the following ways:

- To assess and confirm your eligibility for contract opportunities
- To communicate with you regarding the status of your supplier registration and applicable contract opportunities
- As necessary, to conduct criminal background and credit checks as allowable by applicable law (Note: you will be notified further of this process if applicable)
- To respond to your requests and inquiries
- To provide access to our global IT and communications systems as necessary
- To process payments to you
- To monitor the performance of our contract with you
- To monitor and ensure compliance with legal and statutory regulations and our internal policies and procedures, including the conduct of investigations or providing information to local tax offices
- To comply with applicable law(s) (for example, to comply with a search warrant, subpoena or court order)
- Internal purposes, such as internal audits and reviews, analysis and system administration

We will process your Personal Data for the purposes identified above on the following bases:

1. Our legitimate interests, which include processing such Personal Data for the purposes of managing our procurement process, and assessing and confirming a supplier's suitability for contract opportunities;
2. Where such processing is necessary to perform our contract with you or to take steps before entering into our contract with you; and
3. As necessary to comply with our legal obligations, resolve disputes and enforce our contractual agreements.

Unless a longer retention period is required by applicable law, we will retain your information for as long as our contract with you is active, as well as for a short additional period afterwards to cover any outstanding issues or queries that may arise in relation to your account (for example, outstanding payments). This period of retention is subject to our review and alteration.

### **Sharing and Disclosure to Third Parties**

We may disclose your Personal Data to third parties from time to time under the following circumstances:

1. You request or authorize the disclosure of your personal details to a third party.
2. The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant, subpoena or court order).
3. The information is provided to our agents, vendors or service providers who perform functions on our behalf. See below for additional details.

It is likely that the identity and categories of such third parties will change during the life of your account but, it is anticipated that your Personal Data will be disclosed to the following categories of third-party service providers who perform functions on our behalf. We require that our third-party service providers only use your Personal Data as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with this Privacy Policy.

- Hosting providers for the secure storage and transmission of your data
- Consumer reporting agencies for the purpose of performing background and credit checks as necessary and as permitted by applicable laws
- Financial institutions who process/distribute payments on our behalf
- Technology providers who assist in the development and management of our systems and web properties
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants

### **Collection of Information Through Cookie Use**

If you utilize our websites, we may obtain information about your general internet usage by using a "cookie" file. A cookie is an element of data that a website can send to your browser, which may then be stored on your hard drive. If you do not agree, you can choose to not receive a cookie file by enabling your web browser to refuse cookies or to prompt you before you accept a cookie.

The following types of cookies may be used on our websites:

1. Essential Cookies: These cookies are necessary for our websites to work properly. They are usually only set in response to actions you take such as logging in or completing online

forms. You can set your browser to block or alert you about these cookies, but some parts of our sites will not function if these cookies are blocked.

2. **Functionality Cookies:** These cookies enhance the functionality of our websites by storing your preferences (such as your preferred language or the region that you are in) and allow us to provide enhanced features on our sites such as videos. These cookies may be set by us or by third-party content that we have placed within our pages. If you do not allow these cookies, some of the features on our websites may not function properly and you may not receive a personalized experience when visiting our sites.
3. **Performance Cookies:** These cookies allow us to count page visits and traffic sources so we can measure and improve the performance of our sites. They help us to understand which pages are visited most frequently and how visitors interact with our sites. Any information collected by performance cookies is aggregated and therefore not identifiable. If you do not allow these cookies we will not receive data related to your visits to our sites.

All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage your preferences related to cookies, please consult the privacy features within your browser.

Further information about cookies:

- [How to control cookies in your browser on aboutcookies.org](https://www.aboutcookies.org/)
- [How to manage your preferences related to targeted advertising](#)

### **Transfer of personal data internationally**

By providing us with your Personal Data, you acknowledge and agree that we may from time to time transfer any of your Personal Data to any of our offices or to the offices of any of our affiliates, agents or appointed representatives located around the world. We have implemented appropriate safeguards for transfers of personal information originating from the European Economic Area (EEA) to countries located outside of the EEA. These safeguards include implementing standard data protection clauses which have been approved by the European Commission or (in relation to transfers from the European Union to the USA) transferring Personal Data to entities who have signed up to the EU-U.S. [Privacy Shield](#). Please do not submit any Personal Data to us if you do not wish for your data to be transferred internationally.

### **Security and Other**

We use reasonable measures to strive to safeguard and secure the Personal Data we collect. Any transmission of personal information is at your own risk. Technology, such as, but not limited to, Transport Layer Security (TLS) and Secured Socket Layer (SSL), is used to enhance security and reduce risk of loss. Our security practices, processes or technology do not guarantee absolute security of your information and you should take all normal personal precautions such as, but not limited to, not sharing passwords, closing browsers, and not using public networks (e.g., internet cafes, etc.).

### **Subject Access/User Rights**

As a user, you are subject to the following rights:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data

- In limited circumstances, you may have the right to receive Personal Data in a format which may be transmitted to another entity.
- If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with your local supervisory authority. If you are located in the European Union, you can find the details of your local supervisory authority [here](#).

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to our Data Protection Officer using the contact details listed below:

Jonathan Mabe, Data Protection Officer  
Association of International Certified Professional Accountants  
220 Leigh Farm Rd.  
Durham, North Carolina 27707  
[SecurityandPrivacyOffice@aicpa-cima.com](mailto:SecurityandPrivacyOffice@aicpa-cima.com)

#### **Contact Information**

You are encouraged to report any improvements, suggestions, or any suspected breaches of privacy or security to us by emailing us at [SecurityandPrivacyOffice@aicpa-cima.com](mailto:SecurityandPrivacyOffice@aicpa-cima.com).