

## buildingSMART International

### PRIVACY POLICY

This version is effective from March 2023

#### 1. INTRODUCTION

This Privacy Policy (“Privacy Policy”) sets out how buildingSMART International processes your personal data in connection with: our website at <https://education.buildingsmart.org/> (“Site”) and the delivery of our programs and services (together our “Services”).

buildingSMART International are the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy Policy).

#### Contact Details

If you have any questions about this Privacy Policy or want to exercise your rights as a data subject, you can contact us using the following methods:

<b>Email address:</b>	<a href="mailto:contact@buildingSMART.org">contact@buildingSMART.org</a>
<b>Postal address:</b>	buildingSMART International Kings House Station Road Kings Langley Hertfordshire WD4 8LZ United Kingdom
<b>Registered address:</b>	buildingSMART International 9 Quay Court Colliers Lane Stow-cum-Quay Cambridge CB25 9AU UK  Registered in England under 5024694

#### 2. WHAT PERSONAL DATA WE COLLECT

In providing our Site and Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Site and Services and includes the following:

<b>Identity Data</b>	First name; last name.
<b>Contact Data</b>	Delivery address; billing address; email address; telephone number.
<b>Member, Partner and Chapter Data</b>	Data relating to our Services such as name, title, billing address, delivery address, email address, phone number, contact details, purchase details (on behalf of an member, partner or chapter), information relating to approved training providers used by the member,

	partner or chapter; password; contact preferences; any other personal data that you may provide when you register an account with us.
<b>Behavioural Data</b>	Data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any Services you viewed or purchased through the Site.
<b>Technical Data</b>	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct Polycys and information; any other unique numbers assigned to a device.
<b>Communications Data</b>	Marketing preferences; service communication preferences. Any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.
<b>Supplier Data</b>	Data relating to any purchases of goods and/or services by us such as your name, title, billing address, physical address, email address, phone number, contact details, supply details and your bank details.
<b>Training and Testing Data</b>	Test scores, certifications, attended courses, educational history, professional licensure;

### 3. WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

<b>People who work for our Members, Partners and Chapters</b>	If you contact on behalf of, or through your work for, one of our Members, Partners or Chapters we will collect and process your personal data in connection with your interaction with us.
<b>Members of the bSI community</b>	If you participate in relevant training and testing through our local Members, Partners or Chapters.
<b>Site visitors</b>	If you browse or interact with our Site, we will collect and process your personal data in connection with your interaction with us and our Site.
<b>People who contact us with enquiries</b>	If you contact us with an enquiry through our Site, submit a complaint through our Site or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us and our Site.
<b>People who work for our customers and suppliers</b>	If you work for one of our suppliers and have responsibility for placing orders with us, administering your organisation's account with us or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
<b>Event attendees</b>	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may

	ask you to complete a registration or feedback form, or other document relating to the event.
<b>Visitors to our physical locations</b>	If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. CCTV footage may also be collected for security purposes.

#### 4. HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

<b>If you contact us about our Services</b>	<p>We collect and maintain personal data that you submit to us for the purpose of supplying our Services. We may collect and process Identity Data, Contact Data and Member, Partner and Chapter Data whether you are interacting with us on your own behalf or on behalf of any organisation you represent. We process this information so that we can supply our Services, maintain our user databases and to keep a record of how our Services are being used.</p> <p><i>Our legal basis for processing is our legitimate interests.</i></p>
<b>If you browse our Site</b>	<p>When you browse our Site, we collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our Site. We do this so that we can better understand which parts of our Site are more or less popular and improve the structure and navigation of our Site.</p> <p><i>Our legal basis for processing is our legitimate interests.</i></p>
<b>If your data is submitted to us by a local Member, Partner or Chapter</b>	<p>If you register with a local Member, Partner or Chapter, your Identity Data, Contact Data and Training and Testing Data may be provided to us to enable us to provide relevant training and testing and award certifications.</p> <p><i>Our legal basis for processing is our legitimate interests.</i></p>
<b>If you sign up for and/or attend one of our events</b>	<p>From time to time, we organise and host events for the purpose of promoting our activities. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.</p> <p><i>Our legal basis for processing is our legitimate interests. We may also specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on consent.</i></p>
<b>If we need to use your personal data to receive products and</b>	<p>If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support), we will collect</p>

<b>services from our suppliers</b>	<p>and process your personal data in order to manage our relationship with you or the organisation you represent.</p> <p><i>Our legal basis for processing is our legitimate interests.</i></p>
<b>If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business</b>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p><i>Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</i></p>
<b>If we send you marketing communications by email/</b>	<p>We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by email.</p> <p><i>It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you. It is in our legitimate interest to use your personal data to send our marketing to you by post. However, we will only send marketing communications to you by email where you have consented to receive such content by email, or where we have another lawful right to do so.</i></p>
<b>If we advertise to you on social media and other platforms</b>	<p>We may use Customer Data, Technical Data and Supplier Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you.</p> <p><i>Our lawful ground for this processing is legitimate interests which is to grow our business.</i></p>

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

Your data may be shared with the third parties listed below This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

<b>Other members of our group</b>	<p>We share data with other organisations in our group who provide services to us.</p>
<b>Third-party suppliers who provide applications/ functionality,</b>	<p>We share personal data with third parties who support us in providing our Site and help provide, run and manage our internal IT systems and provide other administration.</p>

<b>data processing or IT services</b>	
<b>Event partners and suppliers</b>	When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.
<b>Payment providers and banks</b>	We share personal data with third parties who assist us with the processing of payments and refunds.
<b>Third-party post/email marketing and CRM specialists</b>	We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
<b>Auditors, lawyers, accountants and other professional advisers</b>	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
<b>Law enforcement or other government and regulatory agencies and bodies</b>	We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
<b>Another corporate entity in connection with a business transition</b>	If we are involved in a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets, we may share or transfer personal data to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
<b>Other third parties</b>	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## 6. INTERNATIONAL TRANSFERS

We may share your personal data within our group of companies which involves transferring your data outside the United Kingdom or the European Economic Area (EEA).

Countries outside of the United Kingdom or the EEA do not always offer the same levels of protection to your personal data, so UK and European law has prohibited transfers of personal data outside of the UK and EEA (respectively) unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the UK or the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## **7. DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## **8. DATA RETENTION**

We will only retain your personal data 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.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers and suppliers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers and/or suppliers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further Policy to you.

## **9. YOUR LEGAL RIGHTS**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please contact us using the contact details provided above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded,

repetitive or excessive or refuse to comply with your request in these circumstances.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **10. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. 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 Policy of every website you visit.

## **11. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. We use cookies to help you navigate efficiently and perform certain functions. You will find detailed information about all cookies under each consent category in the cookie notice.

## buildingSMART International

### COOKIE POLICY

This version is effective from: March 2023

#### 1 INTRODUCTION

Where this Cookie Policy refers to “bSI”, “we”, “us”, “our”, this means bSI whose details are listed below.

<b>Email address:</b>	<a href="mailto:contact@buildingsmart.org">contact@buildingsmart.org</a>
<b>Postal address:</b>	buildingSMART International Kings House Station Road Kings Langley Hertfordshire WD4 8LZ United Kingdom
<b>Registered address:</b>	buildingSMART International 9 Quay Court Colliers Lane Stow-cum-Quy Cambridge CB25 9AU UK  Registered in England under 5024694

We use cookie technology to help log visitors to our website (“**Site**”). By doing this, it helps us to provide you with a good experience when you browse our Site and allows us to improve our Site.

Cookies are pieces of data that are created when you visit a website, which are then stored in the ‘cookie directory’ of your computer / device. A number of cookies can be created when you visit a website.

bSI uses the following cookies:

- Functionality cookies. These are cookies enable our Site to function. They allow you to move around our website and use its features, log-in to your account and remember certain preferences. Some of these cookies may be ‘strictly necessary’ to our service and we explain what this means in further detail below.
- Analytical or performance cookies. These cookies allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- Targeting cookies. These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose



Cookies can also be categorized as follows:

- Session cookies. these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or
- Persistent cookies. a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and Clicky.com.

## 2 **STRICTLY NECESSARY**

Some of the cookies that we use on our Site are strictly necessary for it to function and cannot be deactivated. You can choose to have your browser block or alert you on these types of cookies, however, this may result in some parts of the Site not working. These cookies do not store information that will identify you directly. However, other non-essential cookies may be deactivated, which is explained below.

## 3 **THIRD PARTY COOKIES**

You should note that third parties may also make use of cookies. We do not have control over the use of such cookies (which are likely to be analytical).

## 4 **LIST OF COOKIES USED**

More information on some of the cookies we use and the purposes for which we use them, is listed in the Cookie Settings. Click the arrow head by the cookie category to see the cookies under each category.

## 5 **DEACTIVATING COOKIES**

You can block cookies via the settings on your internet browser. This will allow you to refuse the setting of all or some cookies. If you use this setting to block all cookies, including those that are essential, you may not be able to access all parts of our Site. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).