

## **Section A: Administration**

### A-15 Privacy Policy

**Review Responsibility:** Executive Director, Board of Directors, General Counsel and Membership

**Policy Statement:** The American Spice Trade Association (ASTA) is committed to protecting individual member volunteer privacy.

**Purpose:** This Privacy Policy describes how ASTA collects, uses, and shares member information when individual members utilize ASTA services including, but not limited to, accessing staff, join, register or otherwise participate in any ASTA event or meeting, participate in ASTA surveys, access and use all ASTA operated and controlled websites including ([www.astaspice.org](http://www.astaspice.org)) (Services).

#### **Procedure:**

##### **1. Information Collection and Use**

ASTA collects certain data about individual members, including when members provide personal data when members join, sign up for membership, register for events, meetings and webinars, and when members access and use the ASTA website. ASTA may use this information for a variety of reasons, including but not limited to, ensuring that members receive ASTA news, updates, and other information, administer and facilitate member participation in ASTA events, meetings or webinars for which members have registered, respond to member requests and inquiries, and to improve the Services.

ASTA processes the personal data collected through the Services on the lawful basis of legitimate interests to provide the Services to members. Such processing is necessary for the purposes of the legitimate interests pursued by ASTA or by activities related to the Services.

##### **2. Personal Data Members Provide to ASTA**

###### Membership & Event Information:

ASTA collects certain personal data from members when members join ASTA or register for ASTA events. Personal data refers to information about members that may identify the individual members, such as first name, last name, employer, title, email address, phone number, and mailing address. ASTA uses this information to provide members with information regarding membership, register members for events, provide information about events or webinars, provide members with industry related updates, respond to member inquiries and other associated administrative needs.

###### ASTA Account Information:

ASTA may require members to register for a website or other ASTA account which may allow members to register for certain ASTA meetings, events or webinars or to gain access to other

member-only resources and other Services. In order to provide related Services, ASTA will collect certain information about members in connection with registration for ASTA account, which may include personal data and other information such as a username, password, personal profile, location, and employer information.

Payment Transaction Information:

ASTA may collect and store information related to purchases made through the Services. Members may provide certain information to complete payments via the Services, including credit or debit card number, card expiration date, CVV code, and billing address (collectively, “Payment Information”), along with name and billing, delivery and shipping address, to complete payment transactions through certain Services.

Correspondence Information:

If members join ASTA, sign-up for a committee, working group or task force, attend a meeting or event, email ASTA or ASTA staff, subscribe to ASTA newsletters, mailing lists, publications, or blogs, ASTA may keep member message, email address, and contact information to respond to member requests, provide the requested products or Services, and to provide notifications or other correspondences to the member. If a member does not want to receive emails from ASTA in the future, the member may let ASTA know by sending an email or by writing to ASTA at the address below. Please note requests to remove email addresses from ASTA lists may take some time to fulfill.

### **3. Other Information Collected**

Cookies, Web Beacons, Links, and Other Tracking Technologies:

ASTA may keep track of how members use and interact with the Services through the use of cookie and other technologies. ASTA may do this to help analyze the use of and improve the Services. Through these technologies ASTA may automatically collect information about member use of the Services and other online activities, including email correspondences. Some Services may not function properly if a member disables cookies. Such data may include analytics information, browser type, operating system, and tracking of member interactions with our content and emails.

### **4. Information Sharing**

ASTA Staff:

ASTA’s staff may have access to member personal data as needed to provide and operate the Services in the normal course of business. This includes information regarding member use and interaction with the Services and to respond to member correspondence, requests, and all other inquiries.

Service Providers:

ASTA works with various organizations and individuals to help provide the Services to members, including but not limited to, website and data hosting companies, webinar hosting companies, event and meeting resorts or hotels, accounting audit firms, etc. (Service Providers). ASTA may share personal data with Service Providers but only for the purpose of providing the

Services. If ASTA becomes aware that a Service Provider is using or disclosing information improperly, we will take reasonable steps to end or correct such improper use or disclosure.

#### Lawful Requests:

ASTA may be required to disclose personal data pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. ASTA shall share information only when necessary to comply with applicable laws, to prevent fraud or other illegal activity perpetrated through the Services or using the ASTA name, or to protect the safety of any person. This may include sharing information with other companies, lawyers, agents, or government agencies. Nothing in this Privacy Policy is intended to limit any legal defenses or objections that a member may have to a third party's, including a government's, request to disclose a member information.

#### ASTA Members:

From time to time, ASTA member personal data, such as name, employer, email address, phone number and business address, may be shared in print and/or electronic format either as an ASTA member directory and/or ASTA member event attendee list(s) or registration list(s). If an individual member does not want ASTA to include their personal data in member directories and/or event attendee or registration lists, the member may let ASTA know by sending an email or by writing to ASTA at the address below. Please note requests to remove personal data may take some time to fulfill.

### **5. Member Rights Regarding Personal Data**

Relevant data protection laws provide ASTA members rights regarding the protection of their data, including: the right to access; the right to rectification, the right to erasure; the right to restrict processing; and, the right to complain to a supervisory authority.

ASTA provides certain tools and settings within the Services to help members access, correct, delete, or modify personal data associated with the Services. Members may contact ASTA at the contact information listed below regarding the information ASTA has collected, including the nature and accuracy of the data that has been collected, to request data be updated, modified, deleted or to opt-out of certain Services.

Member requests to delete or remove information may not necessarily ensure complete or comprehensive removal of the content or information, and removed information may persist in backup copies. ASTA will retain information only for as long as necessary to fulfill the purposes for which information is collected in accordance with ASTA's Document Retention Policy, or as otherwise required by law. Where members elect to and request that ASTA delete personal data, certain features, including but not limited to member access to Services, may no longer be available to the member.

### **6. Information Security**

ASTA will take reasonable efforts to secure and protect the privacy, accuracy, and reliability of member information and to protect it from loss, misuse, unauthorized access, disclosure, alteration and destruction. ASTA implements security measures as deemed appropriate and

consistent with industry standards. As no data security protocol is impenetrable, ASTA cannot guarantee the security of all systems and databases. Additionally, ASTA makes no warranty or guarantee that personal data collected will not be breached, intercepted, destroyed, accessed, or otherwise disclosed without authorization.

In an effort to help maintain security of member information, ASTA members should maintain the confidentiality, insofar as practicable, of member ASTA passwords.

## **7. Contact ASTA**

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