

FIAP Privacy Policy

1. Scope

Protecting the personal privacy of every individual is a crucial part of gaining and keeping your trust in the International Federation of Photographic Art (“Fédération Internationale de l’Art Photographique”, “FIAP”, “we”, “us”). As an international federation, we strive to provide a high level of privacy protection across all of our services and to deploy consistent, rigorous policies and procedures. We promise to collect, use and store your personal data in a safe and secure way. We only use your personal data for the specific purposes stated. We keep you informed about how we use your information and who we give it to. This privacy policy (the “Policy”) serves as our commitment to you to protect the security and privacy of your personal data and covers the following areas of privacy concerns:

- What information is being collected
- When, how and why it is collected
- Which is our legal basis for processing your data
- How we use and process your data
- When and who will it be shared with
- How long do we retain your data
- The security measures we take to protect your data
- The choices you have over how your data is collected and used by us
- Your rights over your data
- Who to contact and what to do if you wish to discuss with us about your data and your rights

This Notice does not apply to third-party applications, products, services, websites or social media features that may be accessed through links that we may provide on our websites and interfaces. Accessing those links may result in the collection of information about you by a third party. We do not control or endorse those third-party websites or their privacy practices. We encourage you to review the privacy policies of such third parties before interacting with them.

Please read this Notice carefully. Our services are rendered to you on the basis of your understanding of your data privacy rights. When visiting our website, electronic platform or any other web-based interfaces and using our services that link to or reference this Notice, you agree to be bound by the terms and conditions of this Notice.

2. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the data alone or in conjunction with any other data in the data controller’s possession or likely to come into such possession. The processing of your personal data is governed by applicable privacy laws.

3. What roles do we play in processing your data?

We are processing your data as a data controller with respect. We know that you care how data about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly.

4. Which is our lawful basis for processing your personal data?

The lawful base for us to process your personal data for the various types of processing performed on your data (please refer to “*How do we process your personal data*” section of this Notice) is either a) your given consent for processing as necessary for us to enter into and to perform our service or contract with you, or b) our obligation to comply with the applicable employment, social security or civil, fiscal, penal or other legislation, or c) the need to pursue the legitimate interest of FIAP or third parties.

Unless otherwise stated in this Notice, we collect, process and use the personal data supplied by you only for the purposes communicated to you and will not disclose it to third parties, or only with your consent or permission, unless disclosure is necessary to perform a contract with you, or disclosure is required by law or to comply with a government agency or court orders, or disclosure is necessary to establish or preserve a legal claim or defense and furthermore, or disclosure is necessary to prevent misuse, fraud, plagiarism or other illegal or non-ethical activities, or disclosure is carried out for any additional purpose that is directly related to the original purpose for which the personal data was collected.

Unless otherwise stated in this Notice, we collect, process and use the personal data supplied by third parties, such as photographic salon organizers and FIAP events’ organizers and will not disclose it to third parties unless we have your consent or permission or disclosure is required by law or to comply with a government agency or court orders, or disclosure is necessary to establish or preserve a legal claim or defense and furthermore, or disclosure is necessary to prevent misuse, fraud, plagiarism or other illegal or non-ethical activities, or disclosure is carried out for any additional purpose that is directly related to the original purpose for which the personal data was collected.

We further detail the circumstances of data disclosure to third parties in the section “*Sharing your personal data*” below.

Where we talk about “Legitimate Interest” this means the interest of FIAP (as an International Federation) and of our affiliate members in developing and promoting worldwide photographic knowledge from an artistic, educational and scientific standpoint and create friendly and fraternal connections in the field of photography among all its affiliated members. We make sure that we offer you the most secure experience and we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the interests or rights and freedoms of you (unless we have your consent or are otherwise required or permitted to by law).

Where we talk about our legitimate interest, such legitimate interest can include but is not limited to:

- Implementation and operation of a worldwide organizational structure and world-wide information sharing;
- International development of FIAP structure;
- Realization of FIAP goals as described in its statutes;
- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud and plagiarism;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal Investigations;

5. Necessity to provide us data

You are not under any obligation to provide us any personal data. As noted below, the choice is yours. By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. However, please note that without certain data from you, we may not be able to undertake some or all of our obligations to you, or adequately provide our full range of our services. Where we need to collect personal data in order to provide our services worldwide or because we are obliged by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to correctly realize our goals as described by our Statutes. In this case, we may have to cancel your membership or partnership or use of our services but we will notify you if this is the case at the time. If you would like to obtain more detail about this, please contact us following the instructions in the “*Whom should I contact*” section below.

6. When and how are your personal data collected?

Some of your data can in particular be collected by us:

- whenever you become a Member of our Board of Directors;
- whenever you become a Director of a FIAP Service Direction;
- whenever you become a Director of a FIAP Exhibition Center;
- whenever you become our Liaison Officer of a FIAP Operational Member;
- whenever you become or act as our contact person of an ILFIAP or IRFIAP Member;
- whenever you register as an Individual Member;
- whenever you apply for a FIAP Life Card;
- whenever you proceed to fees or other payments towards FIAP;
- whenever you apply for FIAP patronage or FIAP auspices;
- whenever you apply for FIAP artistic or honorific distinctions;
- whenever you are awarded a FIAP honorific distinction;
- whenever you apply for FIAP medals, ribbons or awards;
- whenever you organize a FIAP event, like a Biennial, a World Cup for Clubs, a Photo-Meeting or a Congress;
- whenever you participate in a FIAP event, like a Biennial, a World Cup for Clubs, a Photo-Meeting or a Congress;
- whenever you participate in a photographic salon under FIAP patronage or auspices;

- whenever you send us your photos to be part or enrich any kind of FIAP physical or electronic photographic collections;
- whenever you use any FIAP services;
- whenever you visit our website, electronic platform or other web based interfaces;
- whenever you register to use our online services (each time you log in or each time you use them);
- whenever you contact FIAP either directly or through our Liaison Officers or ILFIAP-IRFIAP contact persons or via the various channels we may offer you;
- whenever you fill in forms that we send to you;
- whenever you are, you act or you function either as an employee, or an assistant, or a supplier, or an associate or a partner or a sub-contractor of us in a performance of a contract or any other type of relationship where the data subject is a party.
- whenever you opt-in to our communications, including but not limited to: newsletters, online and live event registrations, and other promotional information and materials;
- whenever you give us consent in writing to the processing of your personal data for that specific purpose.

7. What personal data do we collect about you?

The personal data we collect include any and all data you provide to us when you enter into contract with us, register with us, enter or use our website, electronic platform or any other type of web-based interface, provide us information on a web form, update or add information to your account or registration list, or give us in any other way, as described above (under 6. *When and how are your personal data collected*). These data may include but are not limited to your name and surname, age, gender, your title, your artistic or honorific FIAP distinction, your physical and electronic address, your telephone, fax or other form of communication identification element (Skype, Viber, Messenger, etc.), your personal ID Photo, other photos or videos made by you or presenting you, your physical or electronic signature, login, account name, account number, your account activity, files accessed or used by you, your transaction data and any information you provide during a transaction, or other transaction-based content that you generate or connected to your account as a result of your transaction, your financial data such as banking details, credit card numbers, PayPal or other electronic type of payment details, logistics and billing data (such as customs ID and tracking number), your email, chat and service history with us, and any other information you may provide us such as your interests and preferences. You can choose not to provide data to us, but we may then not be able to service you where such services require processing such data. We use the data that you provide for purposes administering your use of our services, such as communicating with you, responding to your requests, managing your account, customizing your service experience with us, improving our services, and personalizing communication with you. We may contact you by mail, email, telephone or any other way of electronic communication. We will send you strictly service-related announcements or information when it is necessary to do so.

We use "cookies," which are unique identifiers that we transfer to your device to enable our systems to provide features of our services, allow you to visit our websites, platform or

other interfaces without re-entering your username and/or password, verify that you have the authorization needed for the services to process your requests, personalize and improve your experience, record your preferences, customize functionalities for your devices, and to improve the functionality and user-friendliness of our services. These cookies help us to better understand how you interact with our services and to monitor aggregate usage and web traffic routing on our websites, platform or other interfaces. Most of the cookies used by us are so-called "session cookies", which will be deleted after your visit. FIAP uses the following categories of cookies on our websites, platform or other interfaces: Strictly necessary - These cookies are essential for certain features of our websites, platform or other interfaces to work. These cookies do not record identifiable personal information and we do not need your consent to place these cookies on your device. Without these cookies some services you have asked for cannot be provided. Performance - These cookies are used to collect anonymous information about how you use our websites, platform or other interfaces. This information is used to help us improve our websites, platform or other interfaces. In some cases we use trusted third parties to collect this information for us which may include recording your use of our websites, platform or other interfaces but they only use the information for the purposes explained. By using our websites, electronic platform or any other type of web-based interface you agree that we can place these types of cookies on your device. Functionality - These cookies are used to provide services or remember settings to enhance your visit, like for example text size, menu adjustments or other preferences. The information these cookies collect is anonymous and does not enable us to track your browsing activity on other websites, platform or other interfaces. By using our websites, platform or other interfaces you agree that we can place these types of cookies on your device. To find out more about cookies, visit www.aboutcookies.org. Cookies do not cause any damage on your computer and do not contain any viruses. Most browsers automatically accept cookies as the default setting. You can modify your browser setting by editing your browser options to reject our cookies or to prompt you before accepting a cookie. However, if a browser does not accept cookies or if you reject a cookie, some portions of our services may not function properly.

We also obtain certain types of data when your web browser accesses us and other content served by us or on our behalf on other websites, such as the Internet protocol (IP) address used to connect your computer to the internet and your access times, tracked only for security purposes, in case of malevolent action by unauthorized users. We do not obtain information such as device ID or token, unique identifier, device type, ID for advertising, referral URL, computer and connection data such as the type of operating system you use, your device information, your software information, browser type, browser language and version, ad data, your browsing history, and your web log information.

All the data we collect from you may be stored as log files or as augmented information associated with you or your devices. These log files may be used for analysis, research, auditing, and other similar purposes. Your data is stored in log files until the data is transferred to backup databases. We routinely back-up a copy your data to prevent loss of your data in case of a server breakdown or human error. However, all such copies of your data in our backup database will be retained only for as long as our data retention policy

permits (see below *“How long do we keep your personal data”*), and will in any case be deleted immediately upon your request, unless we are required to retain these data by applicable laws and regulations as necessary to assist with any government and judicial investigations to initiate or defend legal claims or for the purpose of civil, criminal or administrative proceedings and to prevent fraud and plagiarism.

Data about you can also be collected by direct transferring to us from third parties. These third-party sources vary over time and include but are not limited to organizers of salons under FIAP Patronage or Auspices, or organizers of FIAP events like Biennials, Photo-meetings, Congresses and Photographic Exhibitions or Workshops, either for the purposes of creation, collection and maintenance of FIAP artistic patrimony and history or for avoiding and preventing fraud and plagiarism. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data.

Use of Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies or IP-address to help the website analyze how users use the site and to monitor and analyze the use of our services. This way we can discover how visitors from particular sources engage with our pages. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States. The IP-anonymization is active and your IP-address will be truncated within the area of the member states of the European Union. Only in exceptional cases the whole IP-address will be first transferred to a Google server in the USA and truncated there. Google will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity, and providing us other services relating to website activity and internet usage. The IP-address that your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our websites, platform or other interfaces. You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Use of Opt-In/Subscribe Personal Data

You have a choice of whether and how you receive a variety of information from us related to our services and helpful communication.

Depending on the case, you may manage your preferences by:

- Opting-in to direct mail communications on a web form;
- Opting-in to email communications on a web form;
- Opting-in to newsletter subscription on a web form;
- Unsubscribing or opting-out of communication, via a link at the bottom of communications emails or by updating your account settings.

If you wish to opt-In/subscribe to our communications, we will use your first and last name and email address to send the communications to you. Out of respect for your privacy, if you no longer wish to receive these communications from us, please follow the opting-out “unsubscribe” instructions usually provided at the bottom of our communications emails, or update your account settings or directly contact us (*see below 17. Whom should I contact?*).

8. Processing of special categories of personal data

In accordance with the applicable privacy laws, we do not collect or process the following categories of data relating to you: your political opinions, religious beliefs, trade union membership, health data, genetic data and biometric data. However, the provision of some services like the creation and sharing of our member’s directories or the provision of some information, like your dietary preferences, declared by yourself during your registration in FIAP Congresses or FIAP Photo-meetings may reveal data like your ethnic origin, religious beliefs or health. You can, of course, exercise the right to oppose the use of this personal data, but this may lead to your being unable to benefit from these services. If we had to process this type of data, we would always request your prior explicit consent.

Nevertheless, we do collect and process data relative to penalties or other disciplinary sanctions imposed by FIAP or by third parties, like photographic competitions organizers or national and international photographic Associations, regarding malicious and fraudulent activity or participation in photographic salons.

9. Privacy of data subjects under the age of 18

We do not knowingly collect, solicit or process personal data or photos from persons under the age of 18, except from participants in special Youth Biennials or other salons or events reserved or opened to minors. Please note that if you are under the age of 18, you should not use our services or participate in any of our activities without prior written consent or authorization of your parent/legal guardian and we will not be liable for any lost or damage incurred by the unauthorized publication of photos and/or disclosure or processing of personal data under the age of 18. You must therefore be old enough to consent to the processing of your personal data or publication of your photos in your own country or be allowed by your parent or guardian to do so, on your behalf. In the event that we may collect, solicit or process data or publish photos from persons under the age of 18, like in Youth Biennials or other salons or events organized by FIAP which are open or reserved to minors under 18 years old, these events will be clearly identified and provide an explicit privacy notice addressed to children under 18. In addition, we will provide an appropriate mechanism to obtain parental approval, allow parents to subsequently make changes to or request removal of their children's personal information and provide access to any other information as required by law.

As soon as you reach the age of 18 and you no longer wish your photos or personal data to be published or processed in any way by us, it is your exclusive responsibility to inform FIAP, otherwise we will still be able to do so lawfully and you will be still be liable against FIAP and any third party for any injuries, loss, claim, action, demand or damage of any kind arising

from or in connection with your submitted photos on the basis of the consent or authorization of your parent/legal guardian that is deemed to be confirmed by you.

10. How do we process your personal data?

We comply with our obligations under applicable privacy laws by keeping personal data up to date; by storing and destroying it securely; by collecting and retaining only the necessary data that we need to service you; by protecting personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The processing operations we perform on your data covers automated and non-automated means of collecting, recording, organizing, structuring, storing, altering, retrieving, using, transmitting, disseminating or otherwise making available, aligning or combining, restricting, and/or erasing your data.

We use your personal data for the following purposes:

- To perform the administration needs of FIAP.
- To manage membership administration and maintain members' personal information.
- To transfer membership personal information to our worldwide based Operational Members and IL/IRFIAPs.
- To compile membership statistics and trends to support membership growth, extension and retention programs.
- To create and share public Directories (in web-based, digital or paper format) of our Administration, of our Operational Members and IL/IRFIAPs and of our FIAP Exhibition Centers (FEC), which include name and contact information of all our Members of the Board of Directors, of all our Directors of Services, of all our FIAP Liaison Officers, of all our IL/IRFIAP Contact Persons and of all our Directors of the FECs, in order to give them the ability to communicate with each other.
- To create and publish public Directories (in web-based, digital or paper format) of our Administration, of our Operational Members and IL/IRFIAPs and of our FIAP Exhibition Centers (FEC), which include name and contact information of all our Members of the Board of Directors, of all our Directors of Services, of all our FIAP Liaison Officers, of all our IL/IRFIAP Contact Persons and of all our Directors of the FECs, in order to make possible for anyone to easily contact FIAP in his country or area. Anyone can have access to these public Directories.
- To share the contact details of our Administration Officials (BD Members and Service Directors), our Liaison Officers of our Operational Members, our Contact Persons of our IL/IRFIAPS and our FIAP Exhibition Centers Directors to anyone in the world, asking for FIAP information in his country or area, for the purposes of external development and realization of FIAP goals.
- To share your contact details with our Administration Officials (BD Members and Service Directors), with our Liaison Officers of our Operational Members, with our Contact Persons of our IL/IRFIAPS and with the Directors of the FIAP Exhibition

Centers around the world, for the purposes of internal administration and back-office support, to ensure our network security and to prevent fraud.

- To share your contact details with any organizer of photographic salon under FIAP Patronage or FIAP Auspices, for the purposes of internal administration and back-office support to ensure and maintain the high level of our photographic contests and to prevent fraud and plagiarism.
- To share your contact details with our logistics and technical partners, distributors, and integrators so that they can assist us to deliver our services to you.
- To inform you about our Administration decisions mainly in the form of circulating documents like “INFOS” and “DOCS”.
- To inform you about our past, present and future events and activities.
- To create and publish public directories or catalogs (in web-based, digital or paper format) of the winners and their awarded works in our salons, Biennials, World Cups or any other type of contest under FIAP patronage.
- To create and publish public directories or catalogs (in web-based, digital or paper format) of the participants and their works in our exhibitions or workshops.
- To create and publish public directories or catalogs (in web-based, digital or paper format) of the participants and their activities during our Congresses or Photo-meetings.
- To design and deliver our services and activities to you.
- To operate our website, electronic platform or other web-based interfaces to provide you access to and use of our services.
- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- To design services and activities and inform you of online and offline events.
- To customize, measure, and improve our services based on your background, interests, or service preferences, where we may create a profile based on such information.
- To provide services requested by you as described when we collect the information.
- To contact you to conduct research about your opinions of current services or of potential new services that may be offered by us.
- To send you communications or conduct webinars informing you of our news, events, new tools, information and activities.
- To maintain the integrity and safety of our data technology systems, which store and process your personal data.
- To enforce or defend our policies or contract with you.
- To detect and investigate data breaches, illegal activities, and fraud.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

11. How long do we keep your personal data?

We retain personal data for no longer than reasonably necessary for the given purpose for which your data is processed. This means that we keep data for as long as necessary to provide our services, or for other legitimate purposes such as complying with our legal

obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types, depending on the context of our interactions with you, on your use of our services, or on our legitimate interest, actual retention periods can vary significantly. If you provide us, or have provided us, consent for us to process your data, we will process your data for no longer than your consent is effective. Notwithstanding the above, we may retain your personal data as required by applicable laws and regulations, as necessary to assist with any government and judicial investigations, to initiate or defend legal claims or for the purpose of civil, criminal or administrative proceedings and to prevent fraud and plagiarism. If none of the above grounds for us to keep your data apply, we will delete and dispose of your data in a secure manner according to our data protection policy.

12. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with the categories of data recipients listed below. We will only share your data with third parties outside of FIAP with your consent, and you will have an opportunity to choose for us not to share your data. Nevertheless, some information is public and immediately viewable and searchable by anyone around the world, in such a way that other users or any FIAP website visitor may see your data which is included in the above mentioned public directories or catalogs (in web-based, digital or paper format) (*see above, 10. how we process your data*) or which you have uploaded by using your ID, such as your name or User name, your physical and electronic address, your ID photo or photos taken by you, or which has been given to FIAP under your consent for this purpose. The following rules do not apply to data shared publicly, according point 10 above, or made available publicly by you, according to your account settings.

However, be aware that we may share your personal data with logistics and technical partners, distributors, and integrators so that they can assist us to deliver our services to you or other trusted third parties that perform business functions or provide services to us or on our behalf. All such third parties may have access to part or all of your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this policy and are required to adequately safeguard your personal data, subject to agreements that correspond to the requirements of GDPR and other applicable laws. Our website, electronic platform and any other type of web based interface are developed by IT companies who may also ask the help of third parties, acting as sub-processors or sub-contractors for them and may be hosted either in their own servers or in external servers of hosting or housing companies. This way not only we (FIAP) but also the Developers, their sub-processors and sub-contractors and the hosting or housing companies may receive, store or process certain types of data whenever you interact with us, as provided in detail in the Developers' Privacy Policies and Privacy Statements and according to the agreements between the Developers and their sub-processors or sub-contractors, providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that the processing will meet the requirements of the GDPR, against unauthorized disclosure by means of physical security, access control and prevention of unauthorized access, encryption, data minimization, security testing, integrity, change and release management, logging and monitoring, availability and data processing instructions.

In case there is an important modification to our trusted third parties or to their respective policies you will be notified according to the procedure described below (under point 18). Please consider their own privacy policies before submitting your data. If you wish to receive a copy of these safeguards, please contact us through the contact details in point 17.

Your personal data may be disclosed in order to:

- Maintain the integrity of our information technology systems;
- Facilitate internal administration purposes;
- Detect and deal with data breaches, illegal activities, plagiarism and fraud, when we believe in good faith that disclosure is necessary to protect our rights, the rights of our members and the rights of the photographers participating to salons under FIAP patronage or auspices. This includes exchanging information with other photographic entities and organizations for the purposes of fraud protection and plagiarism reduction;
- Protect ethics rules regarding salons under FIAP Patronage or Auspices;
- Protect our rights or the rights of those who use our services;
- Respond to a government request.

Depending on the case, your personal data may be disclosed to:

- Our administration Officials (BD Members and Service Directors), our Liaison Officers of our Operational Members, our Contact Persons of our IL/IRFIAPS and our FIAP Exhibition Centers Directors for internal administration purposes;
- Our affiliated entities (Operational members, IL/IRFIAPs) in order to develop and promote worldwide photographic knowledge from an artistic, educational and scientific standpoint and create friendly and fraternal connections in the field of photography among all affiliated members.
- Service providers who work on our behalf or for us and therefore may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this policy, who perform functions that can include but are not limited to web developing and hosting, information processing, auditing, order fulfillment, managing and enhancing customer data, providing customer service, conducting customer research or satisfaction surveys, logistics support, marketing support, payment processing and invoice collection support, informational systems technical support to help us provide, analyze, and improve our services such as local or cloud data storage, maintenance services, database management, web analytics, and improvement of our service features, and to assist us in detecting and dealing with data breaches, illegal activities fraud and plagiarism.
- Third party sub-contractors of our service providers who work on their behalf or for them and therefore may have access to your information only for purposes of performing these tasks under obligations similar to those in this policy, who perform functions that can include but are not limited to web developing and hosting, information processing, auditing, order fulfillment, managing and enhancing customer data, providing customer service, conducting customer research or satisfaction surveys, logistics support, marketing support, payment processing and invoice collection support, informational systems technical support to help our

service providers provide, analyze, and improve their services offered to us such as local or cloud data storage, maintenance services, database management, web analytics, and improvement of their service features offered to us, and to assist them in detecting and dealing with data breaches, illegal activities fraud and plagiarism, related to their services offered to us.

- Photographic salon organizers under FIAP Patronage or Auspices, whether they are or not members of FIAP, in order to keep the high level of our photographic contests and prevent fraud, plagiarism or other illegal or non-ethical activities.
- Governments and/or government-affiliated institutions, courts, or law enforcement agencies, to comply with our obligations under relevant laws and regulations, enforce or defend our policies or contract with you, respond to claims, or in response to a verified request relating to a government or criminal investigation or suspected fraud or illegal activity that may expose us, you, or any other of our affiliated members to legal liability; provided that, if any law enforcement agency requests your data, we will attempt to redirect the law enforcement agency to request that data directly from you, and in such event, we may provide your basic contact information to the law enforcement agency.
- Third parties involved in a legal proceeding, if they provide us with a court order or substantially similar legal procedure requiring us to do so.

We may provide you with opportunities to connect with third party applications or services. If you choose to use any such third party applications or services, we may facilitate sharing of your information with your consent. However, we do not control the applications or services of those third parties or how they use your information, and your use of such applications and services is not governed by our privacy policy. Please review the terms and the privacy policies of those third parties before using their applications or services.

In case we use advertisements sent to your web browser, they will have been made by us. However, if in the future we allow other companies, called third-party ad servers or ad networks, to provide advertisements on our website, these companies may also send cookies to your computer. If an advertiser asks our website to show advertisements to certain visitors and you respond to that ad, the network advertiser or ad-server may think you as of the targeted audience they are trying to reach. The personal information you disclose to other parties such as network advertisers, third-party ad servers, or other websites from the Internet are protected by their respective privacy policies. The privacy policies of different network advertisers or third-party ad servers are not bound to this policy, and our website is not responsible for these privacy policies.

We will display your personal data and account activity in your eventual profile page of our electronic platform or other web-based interfaces or elsewhere on our service portals according to the preferences you set in your account. You can review and revise your profile information at any time. Please consider carefully what information you disclose in your profile page and your desired level of anonymity. In your profile page, we may also display your device information as well as provide the network connection information for the devices to the applications that connect to your devices. Our services also include sharing

and publishing features that by their nature support sharing with other users, registered or not. Those users may see your name, email address, ID photo or photographic works and some information from your profile page and files you choose to share. They may also forward your shared files or published devices to the public. Public information may be broadly and quickly disseminated. Any information published on the internet is accessible to millions of users from all over the world, will be indexed by search engines and may be copied and used by any web user. This means that FIAP has no more control over the subsequent use and disclosure of anything published on the Internet. Please consider what files you share and publish.

13. Transfer, Storage, and Processing of Data Abroad

The Personal Information that we collect from you may be transferred to, stored at, or processed by our engineering, technical support and other teams that support the supply of FIAP web services to you, which are based in : Hayes (UK), Gunzenhausen (Germany), Steinsel (Luxembourg) and Beograd (Serbia) and may have incidental access to certain of your data in order to provide the service (for example, in order to fix technical issues that you report). We rely on the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses), pursuant to Decision 2001/497/EC (in the case of transfers to a controller) and Decision 2004/915/EC (in the case of transfers to a processor. If you wish to receive a copy of these safeguards, please contact us through the contact details in point 17.

As noted in the "*Sharing your personal data*" section of this Notice, as a worldwide international Federation, we may share your information with our affiliate entities or third parties. Please refer to the "*Sharing your personal data*" section of this Notice for the recipients of your data and the reasons for our provision of your data to them. Where such entities are located in other countries and jurisdictions, we will therefore be transferring your personal data within and outside the European Economic Area (EEA). In the last case (non EEA countries) national applicable laws may not afford the same level of protection of your personal data. Where necessary, FIAP will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws and ensure that your data is treated securely and in accordance with this privacy policy.

FIAP may particularly transmit your personal data to third countries outside the EEA if a) an adequate level of protection is ensured by the European Commission from the third country, territory or one or more specific sectors in that third country or b) appropriate guarantees have been provided for their processing by the recipient, in accordance with the law. If none of the above conditions apply, transmission may be made if: (a) you have provided FIAP with your explicit consent to that effect or (b) transmission is required for the accomplishment of FIAP aims, as described in its statutes or (c) the transfer is necessary either for the performance of a contract between you and FIAP or the implementation of pre-contractual measures taken at your request or for the conclusion or performance of a contract concluded in the interest of you between FIAP and another natural or legal person or (d) transmission is necessary for the establishment or exercise of legal claims or the defense of

rights of FIAP or its affiliate members or (e) the transfer is necessary for important reasons of public interest or (f) the transfer is necessary for the establishment, exercise or defense of legal claims or (g) there is an obligation on the part of FIAP by a law or a transnational contract or (h) the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent or (i) for the pursue of the compelling legitimate interest of FIAP or its affiliate members, provided such interests are not overridden by the interests of the individual or (j) the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case or (k) transmission is necessary for keeping the high level of photographic contests under FIAP patronage or auspices or for preventing fraud, plagiarism or other illegal or non-ethical activities.

In order to fulfill the above obligations, FIAP may also transfer your personal data to competent national authorities in order to forward them through the respective authorities of third countries.

The above rules do not apply to data shared publicly, according point 10 above, or made available publicly by you, according to your account settings.

By submitting your personal data or by using our web based or other services, you agree to the storing, processing or transferring of your data as described in detail in this section.

14. Further processing

If we wish to use your personal data for a new purpose not covered by this Notice, then we will provide you with a new notice explaining this new use, prior to commencing such further processing for a new purpose, setting out the relevant new purpose and processing conditions. In such case, there will be a lawful basis for further processing and whenever necessary we will seek your prior written consent to such further processing.

15. Your rights and your personal data

You have the choice to allow us to collect and process your data. The collection and processing of your personal data is neither a statutory nor a contractual requirement, although as noted above, we will be unable to provide you with certain services without the data necessary for such services purposes.

If you are dealing with us online, note that most browsers will inform you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies. Additionally, you can disable or delete data used by browser add-ons, such as Flash cookies, on your browser or on the website of its manufacturer.

In summary, what we are allowed to do with your data is, with limited exceptions under applicable privacy laws, up to you. You can always choose not to provide your data to us, although we may need such data to process your requests, in which case we will inform you of our constraints. Similarly, to the extent that you have already consented to our processing of your data, you can choose to discontinue our processing at any time. However, in the event that you choose for us not to further process your data, such choice may affect the delivery of our obligations or services to you; in this situation, we will also inform you of our constraints.

Unless subject to an exemption under applicable privacy laws, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request to erase your personal data where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time, where we rely on your consent to process your data;
- The right to withdraw your consent to the transferring your data to third parties;
- The right to request that we provide you with your data and where possible, to transmit that data directly to another data controller, where the processing is based on your consent or is necessary for the performance of a contract with you, and in either case by automated means;
- The right, where there is a dispute in relation to the accuracy or the lawfulness of our processing of your personal data, to request that a restriction is placed on further processing of your data;
- The right to object to us using your personal data to engage in direct marketing;
- The right to lodge a complaint regarding our processing of your data, with the competent authority where you reside or in which your data is processed.

If you would like to exercise any of the above rights, please do so by providing your request to the contact details set forth in the *“Whom should I contact”* section.

After receiving your request, we will evaluate your request and inform you how we intend to proceed on your request, with effect for the future. You will not have to pay a fee to access your personal data (or to exercise any of the other above rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. Under certain circumstances in accordance with applicable privacy laws and regulations as necessary to assist with any government and judicial investigations, to initiate or defend legal claims or for the purpose of civil, criminal or administrative proceedings and to prevent fraud and plagiarism we may withhold access to your data, or decline to modify, erase, port, or restrict the processing of your data.

16. Security

We protect your data using technical measures to minimize the risks of misuse, alteration, unauthorized access, unauthorized disclosure, loss or theft, and loss of access. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

Our website, electronic platform and any other type of web based interface are developed by IT companies who may ask the help of third parties, acting as sub-processors or sub-contractors and may be hosted either in their own servers or in external servers of hosting or housing companies, offering different and adequate security measures, as provided in detail in the Developers' Privacy Policies and Privacy Statements and according to the agreements between the Developers and their sub-processors or sub-contractors, providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that the processing will meet the requirements of the GDPR, against unauthorized disclosure by means of physical security, access control and prevention of unauthorized access, encryption, data minimization, security testing, integrity, change and release management, logging and monitoring, availability and data processing instructions.

In case there is an important modification to our trusted third parties or their policies you will be notified according to the procedure described below (under point 18). Please consider their own privacy policies before submitting your data. If you wish to receive a copy of these safeguards, please contact us through the contact details in point 17.

Some of the used safeguards are data pseudonymization, where all personal information is anonymised prior to compiling statistics and trends, data encryption, firewalls, and data access authorization controls. We take our data security very seriously. Therefore, the security mechanisms used to protect your data are checked and updated regularly to provide effective protection against abuse.

The collection of your information is usually encoded using the encryption module of your browser and certified for international encryption technique. If necessary, we use SSL (Secure Socket Layers) encryption to protect your personal information. Moreover, we have put in place additional and comprehensive state-of-the-art security measures when your data are accessed via the internet. Firewalls prevent unauthorized access. Diverse encryption and identification layers protect your data from intrusion or disclosure to third parties during data transfer. Furthermore, we internally use sophisticated encoding methods in order to prevent de-coding by unauthorized persons. Moreover, an electronic identifier is generated during data transfer to safeguard your information.

For your confidentiality and security, we use ID and password when needed for making secure your personal account. It is important for you to protect your ID, password, or any personal information. Do not disclose your personal information (especially password) to anyone. When you are finished using our services, please do not forget to log out from your

account. If you share a computer, whether in a public or private setting, be sure to sign off and close your browsers when finished using a shared computer.

FIAP shall report without undue delay any serious Security Breach to the authorities and/or the Data Subject as per applicable law or contractual provisions if it becomes aware that the security, confidentiality or integrity of the Personal Data has been compromised and shall take all reasonable steps to mitigate the effects and to minimize any damage resulting from the Security Incident.

Our websites, platform or other electronic or web-based interfaces may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you believe that the security of your data has been compromised, or if you like more information on the measures we use to protect your data, please contact us following the instructions in the “*Whom should I Contact*” section below.

17. Whom should I contact?

If you have any question about this Notice, or if you would like to exercise any of your rights, or if you have any complaints that you would like to discuss with us, please in the first instance send us your signed and dated request, together with a copy of your identity card. Please be as accurate as possible:

By Post to :

Fédération Internationale de l'Art Photographique
c/o Ioannis Lykouris
70 Kolokotroni street, GR-18531, Piraeus GREECE

Or by e-mail to :

info@fiap.net

In case of disagreements relating to our processing of your personal data, you can submit a request for mediation or other administrative action to the data protection supervisory authority at the following address:

Commission Nationale pour la Protection des Données

1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette
Tel. +352 2610 60 1, Fax +352 2610 60 29, e-mail: info@cnpd.lu
Website: <http://www.cnpd.lu/>

18. Changes to this privacy notice

This Privacy Policy constitutes a binding data processing agreement (DPA). By continuing to use any FIAP services after May 24, 2018, you acknowledge our Privacy Policy.

We will keep this privacy notice under regular review and we will place any updates here and where appropriate, we will notify you by e-mail and/or when you next log onto our website, platform or other electronic or web-based interfaces. The terms may be displayed

on-screen and you may be required to read and accept them to continue your use of our Services.

At the end of this privacy notice, we will mention when it was last updated. We encourage you to periodically review this page for the latest information on our privacy practices. By continuing to access or use any of our Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

Effective as of: May 23, 2018

Revised: November 15, 2018