



## Entrepreneur and Family Business Council Privacy Statement

This Privacy Policy is edited by Entrepreneur and Family Business Council Inc., a non-profit organization having its registered office at 1 E. Jackson Blvd. Suite 7900, Chicago IL 60604 (hereafter, the “**Data Controller**”).

The Data Controller offers «EFBC Community Platform» (hereafter, the “**Platform**”) to its users which have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address [www.entrepreneur-and-family-business-council.us.hivebrite.com/](http://www.entrepreneur-and-family-business-council.us.hivebrite.com/)

The Data Controller uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, the Data Controller collects and processes User’s personal data in accordance with the term of use and Cookie policy.

The Data Controller is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

Date of last update: 01/01/2024

### ARTICLE 1. COLLECTED PERSONAL DATA

#### 1.1 When subscribing on the Platform

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name ;
- Last name ;
- Email address;
- Company name;
- Cell number

Demographic information, such as gross revenues and number of employees is gathered for **internal use only** and used collectively to define the collective of who we are as an organization, and that data will never be posted on the “member’s only” section of the website or given out without your prior permission.

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

## 1.2 During the use of the Platform

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Company

The User is aware that when using the Platform, the User may decide to provide « sensitive data » within the meaning of Data Protection Law, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

## ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

| Purpose  |
|--|
| <i>Creation and management of a user account;</i>  |
| <i>Providing the User with all functionalities of the Platform, meaning:</i> <ul style="list-style-type: none"><li>• <i>Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;</i></li><li>• <i>Invite the User to events organized by the Platform</i></li></ul> |
| <ul style="list-style-type: none"><li>• <i>Sending email prospect campaigns in the Name of Customer] and/or its commercial partners</i></li><li>• <i>Sending newsletters in the Name of EFBC</i></li></ul>   |
| <i>Making statistics in order:</i> <ul style="list-style-type: none"><li>• <i>to improve the quality of the services proposed by the Platform;</i></li><li>• <i>improve the usage functionalities of the Platform;</i></li></ul>   |
| <i>Making statistics regarding the effective use of the Platform;</i>  |
| <i>Making statistics regarding the different levels of activity on the Platform.</i>   |
| <i>Enable the synchronization of the User's LinkedIn profile;</i>  |

### **ARTICLE 3. DATA RETENTION PERIOD**

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of 6 months.

### **ARTICLE 4. INFORMATION SHARING AND DISCLOSURE**

EFBC does not rent, sell, or share personal information about you with other people or nonaffiliated companies except when we have your permission, or as follows: some examples would be our media connections, a prospective member that would benefit from talking to you, grant funding through another organization, connection within DePaul, etc. For each of these requests we will personally ask your permission to share prior to doing so.

1. When we respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims; or
2. When we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, and situations involving potential threats to the physical safety of any person, violations of EFBC's Terms of Use, Confidentiality Pledge and Standards or as otherwise required by law.

### **ARTICLE 5. COMMITMENT OF THE DATA CONTROLLER**

The Data Controller commits to process User's personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

- Process User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the strict purpose as described under article 2 of the present privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

### **ARTICLE 6. EXERCISE OF THE USERS' RIGHTS**

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User's consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to the following address [danielle@myefbc.com](mailto:danielle@myefbc.com) provided that the User justifies his/her identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## ARTICLE 7. COOKIES

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Data Controller [Cookie Policy](#)

## ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

We limit access to personal information about you to staff who we believe reasonably contact with that information in order to provide services to you or in order to do their jobs. We take all reasonable precautions to keep your personal information secure and we have put in place physical, electronic, and procedural safeguards that comply with federal regulations to protect personal information about you.

Only authorised persons working for the data controller [and, in some cases, its subsidiaries], can access your personal data. The data controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of user's personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on his behalf for hosting and payment services. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of EFBC, its customers or employees.

List of the main service providers:

| Service Provider   | Service  | You can consult the privacy policy by clicking on the following link:   |
|--|--|---|
| KIT UNITED<br><br>44 rue la fayette<br>75009 Paris<br>France               | HIVEBRITE<br>solution  | <a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>                                   |
| Stripe<br><br>510 Townsend Street<br>San Francisco<br>CA 94103,<br>USA     | Payment Service  | <a href="https://stripe.com/fr/privacy">https://stripe.com/fr/privacy</a>   |
| Paypal<br><br>21 rue Banque<br>75002 Paris<br>France                       | Payment Service  | <a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a> |
| Google Cloud Platform<br>Gordon House, 4 Barrow St,<br>Dublin, Ireland     | Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups | <a href="https://cloud.google.com/security/privacy/">https://cloud.google.com/security/privacy/</a>                       |
| Amazon AWS<br>38 avenue John F. Kennedy,<br>L-1855, Luxembourg             |  | <a href="https://aws.amazon.com/compliance/gdpr-center/">https://aws.amazon.com/compliance/gdpr-center/</a>               |
| Sentry<br>132 Hawthorne Street San Francisco,<br>CA 94107<br>USA           | Production and storage of error logs enabling our developers to correct the code                                 | <a href="https://sentry.io/privacy/">https://sentry.io/privacy/</a>   |
| Sendgrid<br>375 Beale Street, Suite 300,<br>San Francisco, CA 94105<br>USA | Sending of emails from the Platform  | <a href="https://api.sendgrid.com/privacy.html">https://api.sendgrid.com/privacy.html</a>                                 |
| Hivebrite, Inc.<br>16 Nassau St,<br>New York, NY 10038,<br>USA             | Customer support for the Platform  | <a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>                                   |

### **Changes to this Privacy Policy**

Due to changes in legislation, best practices or enhancements to functionality and content on our sites, EFBC may update this privacy policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary e-mail address you have provided or by placing a prominent notice on the applicable site(s), and accordingly you should check here from time to time.

### **How to Contact Us**

If you have questions regarding this Privacy Policy you may contact us at [Danielle@myefbc.com](mailto:Danielle@myefbc.com). You also may write to us at Entrepreneur and Family Business Council at DePaul University, 1 E Jackson Blvd., Suite 7900 Chicago, IL 60604.