



FDP Privacy Policy

This Privacy Policy (“Privacy Policy”) applies to personal information processed by Financial Data Professional Institute (“FDPI,” “we”, “us,” or “our”). This Privacy Policy explains the types of personal information we collect, how we use that information, who we share it with, and how we protect that information. Please read this Privacy Policy carefully before using fdpinstitute.org website (the “Website”).

This Privacy Policy covers all personal information processed by FDPI, which means information that enables you to be identified directly or indirectly. For the purposes of applicable data protection laws, FDPI is the data controller. We can be contacted at privacy@fdpinstitute.org.

FDPI respects the importance of your privacy. We know that when you provide personal information to us, you are showing your trust in us, and we take that seriously. You have a right to make choices about how your personal information is collected and processed.

FDPI is committed to providing the premier charter for financial data professionals. This commitment means that our business will continue to evolve as we strive to offer improved services and features through our Website. Because of this, from time to time our policies will be reviewed and may be revised. FDPI will place any updates to this Privacy Policy on our Website with an “updated on” date at the top. We will inform you of any material changes to the Privacy Policy via a notice on our Website.

1. How We Collect Personal Information

We collect personal information to help us better understand your needs, to provide you with personalized and efficient service, and for other purposes described in this Privacy Policy. We generally obtain personal information directly through the information that you provide to FDPI. We also may obtain personal information automatically, through the use of cookies and other technologies, and in some instances from third parties, such as companies that sponsor programs or conferences in which FDPI participates. We also generate information about participants in FDP programs and events.

You may provide personal information to FDPI in a number of ways.

- Through your use of the Website, such as creating, using, and maintaining an FDP Account Profile at fdpinstitute.org
- Upon registering for any FDPI examination or program, including the FDP examination.
- Upon becoming a FDPI Member
- Upon communicating directly with FDPI either electronically, by telephone, or by providing hard copies of documents, including a business card
- Upon registering for FDPI conferences or events

2. What Personal Information We Collect or Use

The personal information we collect may include: your full name, job title, business address, home address, e-mail address, telephone number, credit card number, education, job description, employer,



criminal history, medical or health information, gender, date of birth, professional references including name, relationship, contact information, work history, volunteer interests, chapter selections, professional complaints or investigations, religious/philosophical beliefs, marital status, social media handles, employment status, reasons pertaining to retired membership status, and information required under the American Disability Act (ADA).

We also generate exam history and outcomes for participants in our FDP Charter Program.

3. Our Use of Cookies

Cookies are small data files that a website transfers to your computer's hard disk for record-keeping purposes. Most web browsers are set to accept cookies. A cookie can contain information that includes a user ID. FDPI uses cookies for website and system administration purposes and to improve site functionality, however, we do not collect User IDs, IP Addresses, or other personal information in our cookies.

Our Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Website. 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. Google will use this anonymous information on behalf of FDPI for the purpose of evaluating Website usage, compiling reports on Website activity, and providing FDPI with other services relating to Website activity.

The "Help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. However, if you disable cookies, you will not be able to take full advantage of Website services. For example, we will not be able to personalize the Website each time you visit. You can also opt out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Addon for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>

4. How We Use Personal Information

FDPI may use personal information to provide you with FDPI products and services and inform you about other FDPI products and services that may be of interest to you. In particular, we may use your personal information to:

- Establish and maintain your FDP Membership
- Administer your FDP Member benefits such as providing your information to our Charter processor and printer, and authorizing third parties to provide you with digital access to FDP publications



FDP Privacy Policy

- Process applications such as Membership renewal that you submit to FDPI
- Provide examination services, including processing your exam registration, authorizing you to schedule your exam seat with our exam administrator, and administering and scoring an examination
- Register you for and facilitate your participation in FDPI programs, conferences and events, and a FDP Chapter
- Correspond with you regarding examinations, events, or other FDPI-related products or services
- Populate the online FDPI Member directory
- Send you FDPI newsletters and other informational materials that may be of interest to you. We will provide you the opportunity to opt out of receiving such information in each such communication.
- Protect the FDP marks and our brand

Where we process your personal information to provide a product or service, we do so because it is necessary to perform contractual obligations. All of the above processing is necessary in our legitimate interests to provide products and services, to maintain our relationship with you, and to protect our business, for example, against fraud. In addition, we may process your personal information in order to comply with legal requirements to which we are subject (for example, tax or financial reporting requirements).

If you choose not to provide us with personal information we need to provide you with a product or service, we may not be able to provide you with the product or service.

5. When We Will Contact You

We may contact you at the e-mail, telephone number, address, or social media accounts that you provide to us in your FDP Account Profile or that is publicly available in order to:

- provide you with updated information about the Website
- provide you with information about your candidacy or future examinations
- inform you of member benefits, including but not limited to upcoming events of interest available discounts, and volunteer and networking opportunities
- Inform you that your membership is lapsed or lapsing
- Enable us to protect our trademarks and our brand

If you are receiving information about FDPI and do not wish to receive this information any longer, you may remove your name from our list by e-mailing us at privacy@fdpinstitute.org and asking to be removed from our mailing list. Please allow 14 days for this request to be processed.

6. How We Disclose or Share Personal Information

FDPI may disclose or share personal information as follows:



Third Party Processors and Transaction Processing

We may engage third parties to perform services in connection with the operation of this Website and our organization. Examples of these third parties may include website hosting service providers, technology service providers, payment processors, legal advisers and consultants, examination administrators, and/or related services. We may share personal information with these third parties, but we authorize them to use this personal information only in connection with the services they perform on our behalf. Such parties are bound by contract to establish appropriate measures to protect your personal information from unauthorized access, use, or disclosure. In addition, we may share certain personal information with third parties as necessary to facilitate our offering of products and services to you.

Third Party Preparation Provider Products and Services

If you authorize us to do so by opting in, we will share your personal information with select third parties that offer services or products that we believe may be of interest to you. These third parties may contact you with communications regarding their own services or products. Such third parties include exam preparation providers.

If you prefer that FDPI not share your personal information with such third parties, you may opt out at the time you register for an examination, where applicable, or by contacting FDPI at privacy@fdpinstitute.org.

Please note that, if you receive any communications from such third parties, you may also contact them directly to opt out of receiving further communications from them.

FDP Chapters

As part of the services we provide, we may share limited personal information of FDPI employees, Members and other registered event guests with local FDPI Chapter Heads, Chapter Executives, and occasionally event sponsors, for local Chapter event management. If you no longer wish to share your personal information with Chapters, please contact FDPI at privacy@fdpinstitute.org, or update your FDP Account Profile at fdpinstitute.org.

FDPI Member Directory

FDPI will make Member name, FDP Chapter affiliation, city, state, country, organization, and LinkedIn profile available through the FDPI online Member Directory, accessible only to FDP Members. Members may choose to opt out of the Member Directory when they renew or join, or by contacting FDPI at privacy@fdpinstitute.org.



FDPI Networking and Social Media Sites

The Website may offer opportunities to engage in social networking, interact with others, and/or submit or post messages or other content, such as on FDPI blogs (e.g., FDPI Networking Sites). The Website may also provide for interactions with third party websites or services, including social media websites, through plug-ins. Please note that any information or materials that you post or submit through such FDPI Networking Sites will be publicly posted to everyone that has access to that site. Posts to third party social media or other sites ("Social Media Sites"), including any content on our Website that you "share" or "like," will be controlled by and subject to the terms of those social media or other sites. We encourage you to use caution when you submit any information or materials on or through any FDPI Networking Sites or interact with third party websites or services through plug-ins. Your use of FDPI Networking Sites is governed by our Terms of Use.

Other

We may share personal information of Members and Candidates with third parties in order to validate membership, candidacy and/or Member status, upon request, if provided with a signed consent form by you. In addition, names of individuals holding any FDPI Charter may be made available to the general public and/or their employers.

We may share personal information of participants in the Fundamentals of Alternative Investments certificate program with their employers to validate enrollment and completion status and pass/fail result where the participant has registered for the program using an employer-issued voucher.

We may share personal information of FDPI Members with government regulators in connection with Member reporting obligations. We may also share personal information with our Professional Conduct Committee, our legal counsel, and/or outside investigators; as required by law; or at the request of law enforcement officials and/or the courts.

Except as described above, FDPI will not otherwise disclose any information about you without your consent unless:

- it is required by law or to comply with a court or administrative order,
- it is necessary to fulfill the purposes described above or to otherwise provide you with a service that you have requested,
- it is to implement our Terms of Use agreement, or
- it will protect the rights, property, or personal safety of another FDPI user, any member of the public, or FDPI.



7. Storage, Transmission, and Security of Your Personal Information

At FDPI, we try to do everything reasonable to keep secure any information that we hold about you, and to keep this information accurate and up to date. We also continually endeavor to improve our security safeguards. Since no data transmission over the Internet can be guaranteed to be totally secure, we do not promise that the information you provide to us will always be totally secure. FDPI disclaims any responsibility for events arising from unauthorized access to your personal information.

8. Retention of Personal Information

We will only retain your personal information to fulfill the purposes for which it was collected, as required for legitimate business purposes as described in this Privacy Policy, or otherwise as permitted by law. When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it.

9. Cross-Border Data Transfers

We transfer personal information for purposes described in this Policy, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers. With respect to transfers originating from the European Economic Area ("EEA"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

Please note also that FDPI or its service providers may use overseas facilities to process or back up its information. As a result, we may transfer your personal information to our overseas facilities for storage. However, this does not change our commitment to safeguard your privacy.

10. Access to Your Personal Information

If at any time you want to view the personal information we hold about you, please access your FDP Account Profile on fdpinstitute.org.

You also have the right to obtain from us confirmation as to whether personal information concerning you is being processed and, where that is the case, to request access to the personal information. The information you may access includes:

- the purposes of the processing,
- the categories of personal information concerned, and
- the recipients or categories of recipient to whom the personal information has been or will be disclosed.

This is not an absolute right, and the interests of other individuals can restrict your right of access.



You may request copies of the personal information undergoing processing by e-mailing us at privacy@fdpinstitute.org. You have the right to obtain one copy of the personal information undergoing processing free of charge. For additional copies, we will charge a reasonable fee based on administrative costs.

11. Changing and Rectifying Your Personal Information

If at any time you wish to change personal information that is inaccurate or out of date, please update your FDP Account Profile. It is your responsibility to maintain the accuracy and completeness of your Account Profile.

You have the right to obtain from us the rectification of inaccurate personal information concerning you by e-mailing us at privacy@fdpinstitute.org. Depending on the purposes of the processing of the information, you may have the right to have incomplete personal information completed, including by means of providing a supplementary statement.

12. Requesting Restriction of Processing of Your Personal Information

Under some circumstances, you have the right to obtain from us restriction of processing your personal information by e-mailing us at privacy@fdpinstitute.org. In such case, the respective data will be marked and may only be processed by us for certain purposes.

13. Objecting to the Processing of Your Personal Information

Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information by us and we can be required to no longer process your personal information. Such right to object may especially apply if we collect and process your personal information for profiling purposes in order to better understand your interests in our products and services or for direct marketing. If you have a right to object and you exercise this right, your personal information will no longer be processed for such purposes by us. You may exercise this right by e-mailing us at privacy@fdpinstitute.org. Such a right to object may, in particular, not exist if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

You may also prevent the processing of your personal information by requesting that your FDP Account Profile be blocked. This will make your Account Profile inaccessible to you and will prevent your personal information from being processed by FDPI. You may request that your Account Profile be blocked by e-mailing us at privacy@fdpinstitute.org.

14. Withdrawing Consent to Processing Your Personal Information

If a specific element of our processing of your personal information relies upon your consent (for example, direct marketing via e-mail and SMS), you may withdraw your consent at any time with future effect by e-mailing us at privacy@fdpinstitute.org. Such a withdrawal will not affect the lawfulness of



the processing prior to the consent withdrawal. You may withdraw your consent regarding the receipt of direct marketing communications directly through your FDP Account Profile. In particular, in instances where you have opted in to sharing your personal information with test preparation providers or other third parties, you may contact us to opt out of future sharing of your personal information with such parties in the future; however, such withdrawal will not affect the lawfulness of the transfers that occurred prior to the opt out.

15. Requesting Data Portability

Under certain circumstances, you have the right to receive the personal information concerning you that you have provided to us. You will receive this information in a structured, commonly used and machine-readable format and you have the right to transmit those data to another entity without hindrance from us.

16. Requesting Erasure of Your Personal Information

Under some circumstances, you have the right to obtain from us the erasure of personal information concerning you. If you wish to have your personal information erased, please let us know by e-mailing us at privacy@fdpinstitute.org and we will take all reasonable steps to delete it, except for that information we need to keep for legal reasons.

17. Your Rights Under Applicable Data Protection Law

Please note that all of these rights described in sections 10 – 16 above are limited under your applicable local data protection law. If you exercise or seek to exercise any of those rights, our obligations to respond are limited by and subject to applicable law.

18. FDPI and Links to Other Websites

The Website provides links to other, third party websites. These linked sites are not under our control, and therefore we cannot be held responsible for their content or conduct. Before disclosing your personal information on any other website, we advise you to examine the terms, conditions, and privacy policies of those websites. For more information concerning links, please see the Terms of Use agreement for the Website.

19. Children's Online Privacy Protection

The Website is directed at an adult market and is therefore intended for use by adults only. We do not knowingly collect any information personal information from children under the age of 16, and users under the age of 16 should not submit any personal information to us.



20. What to Do if You Have a Problem or Question

If you have any further queries relating to our Privacy Policy or if you have a problem or complaint, please contact us by writing to FDPI, 100 University Drive, Amherst, Massachusetts 01002 (RE: Privacy), or by e-mailing us at privacy@fdpinstitute.org.

You may also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:

Telephone: +44 0303 123 1113

E-mail: casework@ico.org.uk

Website: www.ico.org.uk

Web-form: www.ico.org.uk/concerns/

Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

If you are based in, or the issue you would like to complain about took place, elsewhere in the European Economic Area (EEA), please click here for a list of local data protection authorities in the other EEA countries:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

Issue Date: