

CCIX CONSORTIUM, INC.
GDPR COMPLIANCE POLICY (Version 1.0)

Adopted as of August 6, 2018

This GDPR Compliance Policy (also referred to as this “**Compliance Policy**”) represents the policy of **CCIX Consortium, Inc.**, a Delaware nonprofit corporation (“**CCIX**”) regarding the treatment of all Personal Data (as defined herein) of any natural person who is a European Union (“EU”) Resident (as defined herein) to the extent the Personal Data of such individual is governed by the European Union’s General Data Protection Regulation (“**GDPR**”).

1. Background Regarding GDPR:

The GDPR is a regulation adopted by the EU Parliament which applies to any company, whether inside or outside the EU, that gathers, collects, records, organizes, processes, stores, retains and/or otherwise holds any “Personal Data” of any individual who is a “EU Resident.” The GDPR identifies this individual as a “**Data Subject**.”

Under the GDPR, a Data Subject’s “**Personal Data**” may include any information related to that individual which can be used, directly or indirectly, to identify that person, including such information as the person’s name, email address, computer IP address, employer, title/position, country of residence or nationality, home or work address, personal identification number, credit card/bank details, photos of the person, or any posts by that person on webinars, blog posts or social networking websites.

Under the GDPR, a “**EU Resident**” is any natural person that resides in the EU, regardless of what location around the world that person shares his/her Personal Data. An EU Resident could include any US citizen or non-EU citizen that resides in the EU.

2. Scope of this Compliance Policy.

This Compliance Policy addresses the treatment of Personal Data of any individual Data Subject who is:

- (i) participating in, making contributions to, and/or supporting any meetings, work groups, activities, collaborative efforts, other events or work products (including, without limitation, any standards or specifications) sponsored, supported, operated or distributed (in whole or in part) by or on behalf of CCIX (“**CCIX Activities**”); and/or
- (ii) using any programs, technology platforms, or other benefits of any kind offered by or on behalf of CCIX (“**CCIX Benefits**”).

Such Data Subject could include, without limitation, an individual acting as a representative of, or otherwise on behalf of, a CCIX Member (as such term is contemplated by CCIX’s Bylaws) as part of that CCIX Member’s participation in any CCIX Activities or use of any CCIX Benefits.

For purposes of clarity, this Compliance Policy only addresses Personal Data of the individual Data Subject. Thus, this Compliance Policy is not intended to cover data or information about a corporation that is a CCIX Member or any technical information contributed by a CCIX Member through any of its representatives as part of that CCIX Member’s participation in the design, development or promotion of any CCIX standards or specifications.

3. CCIX's Treatment of Personal Data of Natural Persons Participating in CCIX Activities or Using CCIX Benefits.

3.1 Informed Consent.

CCIX intends to seek a GDPR-compliant informed consent from a Data Subject ("**Informed Consent**") if CCIX either directly, or through the assistance of any association management company acting on behalf of CCIX, intends to gather, collect, record, organize, process, store, retain and/or hold any Personal Data of that Data Subject as part of that Data Subject's participation in any CCIX Activities and/or use of any CCIX Benefits.

CCIX's Board of Directors ("**CCIX Board**") may approve the form of Informed Consent to be used by CCIX for this purpose. The current form of Informed Consent is attached to this Compliance Policy as **Attachment "A"** and by this reference incorporated herein. The CCIX Board may amend this form of Informed Consent from time to time, and at any time, as it deems appropriate for compliance with the GDPR.

3.2 Technical and Organizational Measures.

The CCIX Board may approve any technical and organizational measures which CCIX will take, either directly or through the assistance of any third party (including, without limitation, an association management company engaged by CCIX), to assist CCIX in its compliance with the GDPR. These measures may include, without limitation, the technical procedures necessary to (i) obtain and demonstrate a Data Subject's assent to the Informed Consent in compliance with the GDPR; and (ii) carry out a Data Subject's request to erase (i.e., remove and delete) and/or modify his/her Personal Data pursuant to the GDPR.

4. CCIX Member's Treatment of Personal Data Which They Receive from CCIX.

4.1 Treatment of Personal Data Received by CCIX Members.

This Compliance Policy governs the GDPR compliance obligations of CCIX Members with regard to the treatment of any Personal Data of a Data Subject which a CCIX Member may receive as part of that entity's status or role as a Member of CCIX, including, without limitation, any Personal Data received by a CCIX Member's representative (the "**CCIX Representatives**") as part of such CCIX Representative's duties representing his or her CCIX Member on the CCIX Board, any CCIX Work Group, or any other CCIX committee (collectively, "**CCIX Committees**"). For instance, a CCIX Member and its CCIX Representatives (serving on any CCIX Committee) may receive Personal Data of a Data Subject in order to facilitate participation, collaboration and organization of CCIX Activities and/or use of CCIX Benefits by and amongst CCIX, individual Data Subjects and the CCIX Members.

A CCIX Member may use such Personal Data only in accordance with the following conditions:

- (i) such use must be in compliance with the GDPR;
- (ii) such use shall be subject to any conditions or limitations imposed on CCIX pursuant to the Informed Consent or otherwise under the GDPR; and
- (iii) such use must be in compliance with this GDPR Compliance Policy and any other policies and procedures promulgated by CCIX at any time.

4.2 Separate Transactions Outside Status as a CCIX Member.

As noted above, this Compliance Policy governs a CCIX Member’s treatment of any Personal Data of a Data Subject which such CCIX Member receives as part of that entity’s status or role as a Member of CCIX. Thus, and for purposes of clarity, if CCIX and a particular CCIX Member desire to enter into any independent business transaction which is outside of the functions or scope of that entity’s status or role as a CCIX Member (“**Separate Business Transaction**”), then the following should apply:

- (i) CCIX may require that the parties enter into a separate agreement which will govern the treatment of any GDPR-governed Personal Data which is used in, or arises out of, that Separate Business Transaction; and
- (ii) Such CCIX Member acknowledges that any contract regarding any such Separate Business Transaction should not modify the CCIX Member’s obligations under this Compliance Policy regarding the treatment of Personal Data received by such CCIX Member as part of that entity’s role or status as a CCIX Member.

5. Third Party Treatment of Personal Data Which They Receive from CCIX.

CCIX may share certain Personal Data of Data Subject with third parties, including without limitation: (i) any association management company engaged by CCIX to assist CCIX in gathering, collecting, recording, organizing, processing, storing and/or retaining any such Personal Data; and/or (ii) any collaboration partners such as other standards organizations in order to facilitate CCIX’s collaborations with these collaboration partners. CCIX will attempt to obtain appropriate contractual provisions with these third parties to require them to take steps to be in compliance with the GDPR as applicable to the particular third party.

6. Effect of this Compliance Policy; Amendment.

This Compliance Policy applies to all CCIX Members as of the date of adoption set forth above. This Compliance Policy may be amended by the CCIX Board at any time, and from time to time, after giving reasonable notice to all CCIX Members.

CERTIFICATE OF SECRETARY OF CCIX CONSORTIUM, INC.

I, the undersigned, do hereby certify:

- 1. That I am the Secretary of CCIX Consortium, Inc.
- 2. That the foregoing GDPR Compliance Policy (Version 1.0) was adopted by the Board of Directors as of August 6, 2018.

DATED EFFECTIVE: August 6, 2018.

By: Veronique Guere
[Signature], Secretary

ATTACHMENT "A" TO GDPR COMPLIANCE POLICY (Version 1.0)

**CCIX CONSORTIUM, INC.
GDPR INFORMED CONSENT**

This Informed Consent ("**Consent**") is provided by CCIX Consortium, Inc. ("**CCIX**") pursuant to the European Union's General Data Protection Regulation (the "**GDPR**").

This Consent is presented to you in your status as an individual ("**You**" or "**Data Subject**") who is: (i) participating in, making contributions to, and/or supporting any meetings, work groups, activities, collaborative efforts, other events or work products (including without limitation any standards or specifications) sponsored, supported, operated or distributed (in whole or in part) by or on behalf of CCIX ("**CCIX Activities**"); and/or (ii) using any programs, technology platforms, or other benefits of any kind offered by or on behalf of CCIX ("**CCIX Benefits**"). This includes, without limitation, any individual acting as a representative of, or otherwise on behalf of, a CCIX Member as part of that CCIX Member's participation in any such CCIX Activities or use of any such CCIX Benefits.

BY CHECKING THE "I AGREE" BOX TO THIS CONSENT, YOU (AS AN INDIVIDUAL) HEREBY ACKNOWLEDGE AND AGREE THAT YOU HAVE READ THIS CONSENT, UNDERSTAND ALL OF THE NOTICES PROVIDED IN THIS CONSENT, AND HEREBY AGREE TO ALL OF THE PROVISIONS SET FORTH IN THIS CONSENT AS OF THE DATE OF SUCH CONSENT.

NOTICE AND INFORMED CONSENT

By assenting to this Notice and Informed Consent, You hereby give your consent and authorization to collect from You the following personal data ("**Personal Data**")

- First and last name
- E-mail address
- Phone number
- Mobile Number
- Fax Number
- Physical address
- Company name
- Title/position

CCIX may use your Personal Data for the following purposes:

(i) to facilitate participation, cooperation, and collaboration in CCIX Activities and/or use of CCIX Benefits by and amongst CCIX, You, all CCIX Members, as well as the CCIX Member or entity that You represent;

(ii) to provide your Personal Data to all CCIX Members, as well as the CCIX Member or entity that You represent, in order to provide them with information or other notifications regarding your participation in CCIX Activities and/or use of CCIX Benefits;

(iii) to provide your Personal Data to any association management company engaged by CCIX to assist CCIX in gathering, collecting, recording, organizing, processing, storing and/or retaining your Personal Data in order to allow You to participate in CCIX Activities and/or use any CCIX Benefits;

(iv) to provide your Personal Data to CCCIX collaboration partners such as other Standards Organizations (“**Collaboration Partners**”) to facilitate CCIX collaborations with these Collaboration Partners; and

(v) to provide your Personal Data to CCIX’s professional advisors such as attorneys or accountants (“**Outside Professionals**”) in order to facilitate the professional advice from those Outside Professionals (collectively, the “**Permitted Uses**”).

These Permitted Uses may be modified by CCIX after giving reasonable notice to You.

CCIX will retain the Data Subject’s Personal Data for the minimally necessary amount of time to carry out the Permitted Uses.

Providing the Personal Data requested by CCIX is a condition of participating in the CCIX Activities and utilizing any of the CCIX Benefits.

If You are unwilling to provide your Personal Data, or in the future request that your Personal Data be erased (pursuant to the notification described below), You may be denied use or access to one or all of CCIX Activities or CCIX Benefits and/or any of the features or functionalities of the foregoing.

You have the right to withdraw your approval to all or part of this Consent at any time by giving notice to CCIX as outlined below.

You have the right to request at any time that CCIX erase (i.e., remove and delete) and/or modify your Personal Data, or that CCIX give you a copy of your Personal Data, at your cost (prepaid). This can be done by contacting the **CCIX Administrator**, who can be reached at the following email address:

admin@ccix.causewaynow.com.

You have the right to file a complaint with the applicable Supervisory Authority, as defined in the GDPR.

CCIX contracts with an association management company (“**AMC**”) to gather, collect, record, organize, process, store and retain your Personal Data. CCIX’s contract with its AMC will provide that the AMC will be GDPR compliant.

CCIX may share Your Personal Data with other CCIX Members. CCIX has adopted a GDPR Compliance Statement which requires all CCIX Members who receive any Personal Data from other CCIX Members to only use that Personal Data in compliance with the GDPR.

CCIX may share Your Personal Data with its Collaboration Partners that CCIX engages with as part of CCIX’s efforts to promote its CCIX Activities or CCIX Benefits. CCIX will contract with these Collaboration Partners to provide that they will only use Your Personal Data in compliance with the GDPR.

CCIX may share Your Personal Data with or for use by CCIX’s Outside Professionals to facilitate the professional advice from those Outside Professionals.