



## Lebanese International Finance Executives Privacy Notice

### 1. About this Privacy Notice and our role

This Privacy Notice provides information about the different types of personal data that we collect and the ways in which we use it. It applies to all those who interact with us online through our website ([www.lifelebanon.com](http://www.lifelebanon.com)) (our “Site”) and to our members and scholars. Lebanese International Finance Executives Limited (“LIFE”, “we”, “us” or “ours”) is the data controller in respect of any such personal data.

As a data controller, we are committed to protecting your privacy at all times in accordance with all applicable laws and regulations governing the use or processing of personal data, including (where applicable) the General Data Protection Regulation (“GDPR”) and any subsequent data protection legislation, whichever is in force in the UK at the relevant time.

### 2. What personal information we collect, when we collect it and how we use it?

#### (a) Information we collect

When you visit our Site, we will collect certain technical information about your visit, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site. You can find more information about the technical information we collect and how we do so in our [Cookies Policy](#).

#### (b) Information you give to us

We will collect your first name, last name, email address and telephone number, as well as the name of the business and the division you work for **when you make an enquiry**, whether via our Site or by telephone. We need to collect this information in order to respond to your enquiry. We may also keep records of our interactions.

**When you apply for our membership**, we will collect further personal information from you, such as your full name, date of birth, gender, email address, telephone number, your home address, your nationality and your employment details, which we will need in order to consider and process your membership application, and to communicate with you in connection with your membership. During your registration process we will direct you to our payment services provider (unless you are applying as a junior member, under 2 years of experience), which will securely process payments for your membership. Further information will be



generated during your use of our members portal, where you will have an opportunity to create and edit your profile, upload your photo, register for events and make contact with other members.

As a member, you are able to join our mentoring programme, whether as a mentor or mentee. We will collect and retain records of completed mentorship forms. Such information allows us to monitor and improve our mentoring programmes.

One of the main features of our membership is connecting our community of members. Your profile will be available for other members and they may contact you by using your contact details published on our member portal.

**If you apply for our scholarship**, we will collect the following information from you: your full name, email address, telephone number, date of birth, place of birth, nationality, address, your parents' names and information about your course. We will also ask you to complete an application form, which is used by us to collect detailed information about you and your family's financial and educational status, your living expenses, your academic achievements and other relevant data, including any recommendation letters in support of your application. We need all this information to assess your eligibility for the LIFE scholarship and to process your application. We will also use some of this information to communicate with the financial aid officers at your university, who will assist us in our assessment of your eligibility. Further information may be provided to us in the course of your scholarship, for example in relation to your academic progress (such as your grade transcripts), or if your circumstances change. We also sometimes publish our scholars' profiles and bios on our Site, as well as testimonials, but only the part of the Site that is available to registered users. We will always ask for your permission before publish any of your details on our Site.

Our Site allows our members to **apply for jobs or internships**. To make an application you will need to provide certain additional information, for example your CV and covering letter, which we will receive and pass on to the relevant employer. If the employer is a member, they will be able to see all applications for their post on our platform.

If you are not our member or scholar, but you **book an event** on our Site, we will collect your full name, email address, telephone number, address and work details in order to register and process your booking.

We sometimes take photos at our events, which we publish in our publicity materials, mainly on our Site. We will not identify you in any of our publications without your prior consent.

(c) **Information we obtain indirectly**

Your personal information may be shared with us by third parties. For instance we may receive it from your university, if you are our scholar, or you are applying for our scholarship.



We may also receive personal data about you from various other third parties, such as from our analytics providers (Google analytics), advertising networks and social networking sites such as LinkedIn or Twitter (only if you interact with us on such sites).

**(d) Special categories of data**

Data protection law recognises certain categories of personal information as sensitive and therefore requiring more protection. These categories of data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We do not anticipate collecting any special categories of data via our Site. However, in exceptional circumstance, we may receive information about your health, for example if it is relevant in connection with a scholarship application or an event, in order to make adjustments for any disabilities or dietary requirements you may have. We will only process these special categories of data if there is a valid reason for doing so and where the data protection laws allow us to do so.

**(e) Other purposes**

In addition to the purposes mentioned above, we will also process your personal information to manage our organisation, including for accounting and auditing purposes, to conduct our regular reporting activities on the performance of our organisation, including in the context of a business reorganisation or group restructure, to maintain our IT systems, to deal with legal disputes involving you, our members or scholars, our agents and/or our suppliers, and to comply with our legal obligations.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

**(f) If you do not wish to provide any personal data**

Where we need to collect personal data by law, or for the purpose of your membership or scholarship application and you fail to provide that data when requested, we may not be able to progress your application. In this case, we will notify you if this is the case at the time.



(g) **Children's data**

Our Site is not intended to be used by children and our membership and scholarships are not available to candidates under 17 years of age and so, if you are under 17, you must not use our Site or provide any personal information to us without the express consent of your parent or guardian.

3. **Marketing communications**

We operate an opt-in policy for individuals. This means we will not send you any marketing information unless you have requested to receive e-mail, text, sms, post or social media messages from us. If you are our member, sending you information about events and other professional development opportunities is one of the benefits of becoming a member, and at the same time our contractual obligation to you to keep you informed. We will therefore send you such communications in furtherance of our obligations to you, for as long as you remain our member. We may also send you information about LIFE and our events after your membership has terminated.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by emailing us on [unsubscribe@lifelebanon.com](mailto:unsubscribe@lifelebanon.com) or by editing your preferences in your profile on our Site.

Where you opt out of receiving these marketing messages, this will not apply to personal data used by us for other purposes in connection with your membership or scholarship.

For legal entities, such as companies, limited liability partnerships and other incorporated organisations, we operate, in compliance with the relevant data protection laws, an 'opt-out' policy. This means that we may contact such businesses with news and information of our services until we are informed that this communication is no longer required.

4. **Lawful processing**

We are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. The following are applicable, depending on the context:

**Contractual relationship**

Where it is necessary for us to process your personal information in order to perform a contract to which you are a party (or to take steps at your request prior to entering a contract), for example to provide our membership services to you.



### **Legitimate interests**

We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced, and does not unduly impact your rights. For instance, it is in our legitimate interest to process personal data of any person who contacts us with an enquiry, in order to respond to such enquiry, or process data for the purposes connected with the administration of our business, for developing our business strategy and monitoring the performance of our business.

### **Consent**

Generally we do not rely on consent as a legal basis for processing personal data other than in relation to certain direct marketing activities.

### **Legal obligation**

Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Sharing your personal data**

We will not sell, rent or lease your personal information to others. We do not share your personal information with third parties for marketing purposes.

We will only share personal information we collect from you with:

- other entities within our network and members, but we will only share your basic profile information and contact details, to enable other members to link with you;
- our Nurture Committee, who run our education and development programmes, in connection with your scholarship, mentoring, soft skills training, peer-to-peer coaching, advice and/or other opportunities available to our members (as applicable);
- our agents, donors and service providers;
- your university, if you are, or have applied to become, our scholar. We will only share the minimum information required to arrange and manage your scholarship;



- the Information Commissioner's Office, if requested;
- the relevant employer, if you have applied for a job via our Site; and
- if you have specifically consented to us sharing your personal data with a named third party

We may also need to share your personal information for auditing purposes, with our advisers, if we are under any legal obligations or in connection with any legal proceedings, in order to establish, exercise or defend our legal rights.

We require third parties to respect the security of your data and to treat it in accordance with the law. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 6. **International transfers**

We are aware that certain countries outside the UK or European Economic Area (**EEA**) have a lower standard of protection for personal information, including security protections.

As some of our network members and/or entities, who have access to our members database, are based outside the EEA, we have put in place adequate safeguards, in the form of standard contractual clauses approved by the European Commission, to ensure that your personal data is adequately protected, as required by UK data protection laws.

#### 7. **Keeping your data secure**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Any payment transaction will be encrypted.



## 8. How long do we keep your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once you are no longer our customer, we will retain and securely destroy most of your personal information in accordance with applicable laws and regulations. However, we will need to retain any information necessary to verify your qualifications/certification or to issue replacement certificates.

## 9. Rights and duties

### Please inform us of changes

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us.

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (often referred to as “the right to be forgotten”). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).



- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it, or if we no longer need your data for our legitimate interests but we need to hold some of it for the purpose of legal proceedings.
- **Request the transfer** of your personal information to another party.

If you would like to exercise any of the above rights, please:

- email, call or write to us (see our contact details below);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill). This is to allow us to verify your identity and prevent disclosure to unauthorised third parties; and
- let us know the details of your request, for example by specifying the personal data you want to access, the information that is incorrect and the information with which it should be replaced.

Please note that if you request erasure, object to our processing of your personal data or request the restriction of our processing of your personal data we may not be able to provide our services in relation to your investments.

We will investigate any requests promptly and will endeavour to respond within 30 days.

#### 10. **Contact us or the ICO**

Please contact us if you have any questions about this privacy policy or the information we hold about you.

Email address: [info@lifelebanon.com](mailto:info@lifelebanon.com)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can also contact the ICO on 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.





11. **Changes to this Privacy Notice**

From time to time we may update this Privacy Notice. When we do, we will publish the changes on our Site. If material changes are made to this Privacy Notice we will notify you by email or by placing a prominent notice on our Site.