

PRIVACY POLICY

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PRIVACY POLICY

This privacy policy was last updated on May 2023.

The Sororum is committed to protecting your privacy. This privacy policy describes why and how we collect, use and disclose personal information collected from individuals themselves or from other third parties, and provides information about individuals' rights with respect to their personal information. We may use personal information provided to us for any of the purposes described in the relevant section of this privacy policy or as otherwise stated at the point of collection. Our goal is to process personal information as necessary for our legitimate business purposes in a transparent manner. If you have any questions regarding our privacy practices, please contact us as set forth in the Contact Us section below.

"The Sororum" (and "we," "us," "our") refers to such Sororum firm that: (1) is involved in providing or receiving services or products; (2) sends you communications; (3) posted a position for which you are applying; or (4) you have a role or relationship with, including through the use of and access to our websites and applications. Each member firm in the Sororum network is a separate legal entity — be aware that if you are in a jurisdiction outside of the UK, you may or may not have a direct relationship with us, but rather with one of our member firms. For further details, please see <https://www.thesorum.org/>.

OUR PROCESSING ACTIVITIES

To find out more, please go to the section(s) of this policy that are relevant to you.

- Business contacts
- Corporate members
- Individual members of The Sororum
- Users of our websites and applications
- Personnel
- Suppliers
- Attendees of The Sororum events
- Others who get in touch with us

BUSINESS CONTACTS

Information Collection

We collect and use business contact details for individuals associated with existing and potential Sororum members to manage and maintain our relationship with those individuals. Like most businesses, we use a customer relationship management system (the “Sororum CRM”) to store personal information about our business contacts.

The collection of personal information about contacts and the addition of that personal information to The Sororum CRM is initiated by The Sororum staff and may include name, employer name, title, phone, email and other business contact details. In addition, the Sororum CRM may collect data from The Sororum email and calendar systems concerning interactions between The Sororum staff and business contacts.

When we send you emails, we may use technologies to determine whether the email has been opened and whether the links contained within the message have been clicked on. We may combine information collected through these means with other information we maintain about you to measure interest in our specific offerings and email campaigns, improve our offerings to specific target audiences, and tailor our interactions with you.

BUSINESS CONTACTS

Information Use

We use this information for the following business purposes:

Administering, managing and developing our business and services. We may process personal information to run our business, including:

- managing our relationship with members;
- providing services and customer support to our members;
- developing our business and services, such as identifying member needs and improvements in service delivery and learning more about a member relationship opportunity we or other Sororum member firms have an interest in;
- analysing and evaluating the strength of interactions between The Sororum and a contact (e.g., the Sororum CRM uses an algorithm to help with this analysis, and the evaluation is primarily based on interaction frequency, duration, recency and response time);
- performing analytics, including with regard to trends, relationship maps, sales intelligence, and progress against account business goals;
- maintaining and using IT systems;
- hosting or facilitating the hosting of events;
- conducting surveys (e.g. benchmarking) or quizzes; and
- administering and managing our website, systems, and applications.

BUSINESS CONTACTS

Information Use (cont'd)

Providing information about us and our range of services. Unless we are asked not to, we use member business contact details to provide information that we think will be of interest about the Sororum and our services. For example, we may send you industry updates and insights, information about other services that may be relevant to you, and invites to events.

Please review the **Individual rights** section below for information about how you may unsubscribe from our mailing lists and exercise other rights.

Information Retention

Personal information will be retained in the Sororum CRM for as long as we have, or need to keep a record of, a relationship with a business contact. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

Information Disclosure

We may disclose personal information as described in the Information disclosure section below. In addition, business contacts stored in the Sororum CRM may be accessed by other Sororum member firms for the purposes described above.

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Our policy is to collect only the personal information necessary for agreed purposes, and we ask our members only to share personal information with us when it is needed for those purposes. When we need to process personal information to provide our services, we ask our members to provide the necessary information to the data subjects concerned regarding how the Sororum will process that personal information, as our members are typically in the appropriate position to communicate this information to the data subjects (e.g., our members' employees or our members' customers).

Information Collection

Given the diversity of services we provide to members, we process many categories of personal information, which may include:

- Personal details (e.g., name, age/date of birth, gender, marital status, country of residence);
- Contact details (e.g., email address, phone number, postal address);
- Login credentials (e.g., email address or username, password);
- Financial details (e.g., salary, payroll details and other financial-related details such as income, investments and other financial interests, benefits, tax status);
- Survey or quiz responses;

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Information Collection (cont'd)

Given the diversity of services we provide to members, we process many categories of personal information, which may include:

- Job details (e.g., role, grade, experience, performance information and other information about management and employees); and
- For certain member engagements, we may process sensitive or special categories of personal information (such as in performing know your member checks, which may involve us processing government identification documents that may contain biometric data).

We generally collect such personal information from our members or from third parties acting on the instructions of the member, but in limited cases may collect information directly from the data subjects or from publicly available sources, in each case on behalf of our members.

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Information Use

We use the above personal information for the following business purposes:

Providing professional services and products

- We provide a diverse range of professional services and products. Some of our services require us to process personal information to provide advice and deliverables. We may also seek feedback and opinions in surveys (e.g. benchmarking) or quizzes.

Security, quality and risk management activities

- Personal information, such as member users' login credentials, may be processed to administer and manage our websites, applications, and other online services that we make available to members, including to confirm and authenticate identity and prevent unauthorised access. Please see the **Users of our websites and applications** section of this privacy policy for additional information about how such information may be used.
- Personal information may be processed as part of the security monitoring that we undertake to detect, investigate and resolve security threats — for example, automated scans to identify harmful emails (e.g., phishing attempts).

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Information Use (cont'd)

Security, quality and risk management activities (cont'd)

- We monitor the services provided to members for quality purposes and risk management purposes, which may involve processing personal information stored on the relevant member file.
- We collect personal information as part of our member engagement and acceptance procedures, including carrying out searches using publicly available and/or third party sources to help identify heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular member, such as sanctions, criminal convictions, conduct or other reputational issues, including with respect to company directors.

Complying with any requirement of law, regulation or a professional body of which we are a member

- As with any provider of professional services, we are subject to legal, regulatory and professional obligations. Subject to these obligations, and as described in the **Information retention** section below, we need to keep certain records to demonstrate that our services are provided in compliance with those obligations, and those records may contain personal information.

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Information Use (cont'd)

We are continually looking for ways to help our members and improve our business and services. Where agreed with our members, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights to our members, improve our business, service delivery and offerings and develop new the Sororum technologies and offerings. To the extent that the information we receive in the course of providing professional services contains personal information, we will de-identify the information prior to using it for these purposes.

Information Retention

We retain the personal information processed by us in accordance with the terms of our member agreements.

CORPORATE MEMBERS (AND INDIVIDUALS ASSOCIATED WITH OUR CORPORATE MEMBERS)

Information Disclosure

We may disclose personal information as described in the **Information disclosure** section below. In addition, we may disclose personal information to:

Third party organisations that assist us in providing services

- On certain member engagements, pursuant to our agreements with such members, we may engage or otherwise work with other providers to help us provide professional services to our members.

Our members

- Where we need to process personal information to provide professional services to our members, we may include personal information in our deliverables, such as the reports we create.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

We may provide a separate privacy policy in connection with certain services provided to individuals, and where we do so, such privacy policy will apply to our processing of personal information in the performance of those services.

Generally, our policy is to collect only the personal information necessary for agreed purposes, and we ask our members only to share personal information when it is needed for those purposes. When we need to process personal information relating to individuals other than our members to provide our services, we ask our members to provide the necessary information to other data subjects concerned, such as family members, regarding its use.

Information Collection

Given the diversity of the services we provide to individual members, we process many categories of personal information, including, as appropriate for the services we are providing:

- contact details (e.g., email address, phone number, postal address);
- business activities (e.g., job details, role, experience);
- family information (e.g., dependents and other household information);
- financial details (e.g., salary, payroll details and other financial-related details such as income, investments and other financial interests, benefits, tax status); and
- survey responses.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

Information Use

We use personal information for the following business purposes:

Providing professional services

- We provide a diverse range of professional services. Some of our services require us to process personal information to provide advice and deliverables. For example, we may use personal information to provide individual tax advice, immigration services or pension advice.

Administering, managing and developing our businesses and services We may process personal information to run our business, including:

- managing our relationship with members;
- developing our businesses and services (such as identifying member needs and improvements in service delivery);
- maintaining and using IT systems;
- conducting surveys (e.g. benchmarking) or quizzes;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

Information Use (cont'd)

Security, quality and risk management activities

- Personal information may be processed as part of the security monitoring that we undertake. For example, automated scans to identify harmful emails (e.g., phishing emails).
- We monitor the services provided to members for quality purposes, which may involve processing personal information stored in the relevant member file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to member engagements.
- We collect and hold personal information as part of our member engagement and acceptance procedures, including carrying out searches using publicly available sources and third party sources — such as internet searches and sanctions lists — to help identify politically exposed persons and heightened risk individuals and organisations and checking whether there are issues that should be considered in determining whether to work with a particular member — such as sanctions, criminal convictions, conduct or other reputational issues, including with respect to company directors.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

Information Use (cont'd)

Providing our members and prospective members with information about us and our range of services

- With consent or otherwise in accordance with applicable law, we use member contact details to provide information that we think will be of interest about us and our services — for example, industry updates and insights, other services that may be relevant and invitations to events.

Complying with any requirement of law, regulation or a professional body of which we are a member

- As with any provider of professional services, we are subject to legal, regulatory and professional obligations. Subject to these obligations, as described in the Information retention section below, we need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal information.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

Information Use (cont'd)

Complying with any requirement of law, regulation or a professional body of which we are a member (cont'd)

- We are continually looking for ways to help our members and improve our business and services. Where agreed with our members, we may use the information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our members, to improve our business, service delivery and offerings and to develop new Sororum technologies and offerings. To the extent that the information that we receive in the course of providing professional services contains personal information, we will de-identify the information prior to using it for these purposes.

Information Retention

We retain the personal information processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and to establish, exercise or defend our legal rights.

INDIVIDUAL MEMBERS OF THE SORORUM SERVICES

Information Disclosure

We may disclose personal information as described in the Information disclosure section below. In addition, we may disclose personal information to:

Third party organisations that assist us in providing services

- On certain member engagements, pursuant to our agreements with such members, we may engage or otherwise work with other providers to help us provide professional services to our members.

Our members

- Where we need to process personal information to provide professional services to our members, we may include personal information in our deliverables (such as the reports we create).

USERS OF OUR WEBSITES AND APPLICATIONS

This section describes our privacy practices with respect to <https://www.thesororum.org/> and other Sororum websites, applications and online services that link to this privacy policy (together referred to as the “Site”).

We may provide a separate privacy policy in connection with certain websites and applications that we offer, and where we do so, such privacy policy will apply to our collection and use of personal information collected through such websites and applications.

For information about our collection and use of information, such as login credentials, that we process in order to provide member users with access to the websites, applications, and other online services that we make available to members in connection with our professional services, please see the **Corporate members** section of this privacy policy.

For information about our collection and use of information received as part of an application for employment submitted through our Site or if you join our Talent Network or Talent Community through our Site, please see the **Sourcing and recruitment of candidates** section of this privacy policy.

USERS OF OUR WEBSITES AND APPLICATIONS

Information Collection

When you access or otherwise use our Site, we will collect information about you and how you interact with our Site. We may collect information about you through: (1) information you provide; (2) automatic tracking technologies; and (3) third parties.

Information you Provide

When you visit our Site, you may choose to provide information about yourself such as your name, address, email address, telephone number, fax number, job title, and company name. By way of example, you may choose to provide your information in the following circumstances:

- Subscription or ordering newsletters and/or publications;
- Participation in "join our mailing list" initiatives;
- Participation in bulletin boards, discussion, or message forums;
- Entering surveys (e.g., benchmarking) or quizzes;
- Registration for events and conferences;
- Registration for premium online services;
- Contacting us for further information; and
- Visiting our Site while logged into a social media platform.

USERS OF OUR WEBSITES AND APPLICATIONS

Automatically Collected Information

We use online identification technologies, such as cookies, web beacons, SDKs, pixels or similar technologies (“Tracking Technologies”) on our Site. The information we collect using these technologies includes IP address and other identifiers as well as information about your internet activity and browsing behaviour on our Site. We also use website analytics providers which may set Tracking Technologies on your device. Our use of Tracking Technologies allows us to customise your interactions with our Site and with the Sororum and to measure the efficacy of our marketing campaigns.

To properly manage our Site we also log anonymous information on our operational systems and identify categories of visitors by items such as domains and browser types. These statistics are reported in the aggregate to our website administrators. This is to improve the web experience of our Site’s visitors and to provide us with an effective information resource.

When we send you emails, we may use technologies to determine whether the email has been opened and whether the links contained within the message have been clicked on. We may combine information collected through these means with other information we maintain about you in order to measure interest in our specific offerings and email campaigns, improve our offerings to specific target audiences, and tailor our interactions with you.

USERS OF OUR WEBSITES AND APPLICATIONS

Information Use

We use the information we collect as described above for various purposes depending on the context in which we collected the information. For example, it may be necessary for us to process your information in order to process a transaction or provide a service you have requested or otherwise in accordance with a contract between us, or we may process your information in accordance with your prior consent (where you have provided such consent).

We also use the information we collect for the following business purposes:

- Operating and improving the Site;
- Fulfilling your orders and requests;
- Managing your registration preferences;
- Customising the Site and your interactions with the Sororum;
- Understanding how the Site is being used;
- Exploring ways to develop and grow our business;
- Maintaining and improving the safety and security of the Site;
- Preventing and enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks;
- Sending you renewal notifications and/or service notifications;
- Conducting customer satisfaction surveys;
- Improving our products and services;
- Running our operations;
- Complying with law and legal obligations;
- Responding to your inquiries; and
- Sending marketing communications about the Sororum products, services, and events.

USERS OF OUR WEBSITES AND APPLICATIONS

Information Retention

We will retain the personal information collected by us through the Site for as long as is necessary for the purpose(s) for which it was collected as set out above, provided that personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards, and in order to establish, exercise or defend our legal rights.

Information Disclosure

We may disclose personal information as described in the **Information disclosure** section below.

In addition, business contacts stored in the Sororum CRM may be accessed by other Sororum member firms for the purposes described above.

Third Party Sites

Our Site may link to other websites which do not operate under the Sororum's privacy practices. When you visit other websites, the Sororum's privacy practices no longer apply. We encourage you to review each site's privacy policy before disclosing any personal information.

USERS OF OUR WEBSITES AND APPLICATIONS

Children

The Sororum understands the importance of protecting children's privacy, especially in an online environment. The Site is not intentionally designed for or directed at children under the age of 13 years. It is the Sororum's policy never to knowingly collect or maintain personal information about children under the age of 13 in connection with the Site.

Your Choices

Unsubscribe

Should you wish to unsubscribe from our mailing list or any registrations, we will provide instructions in the appropriate area of the Site or in communications to you.

Managing Cookies

If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, you may refuse or delete one or more cookies and still access our Site, but Site functionality may be impaired. After you finish browsing our websites, you may delete Site cookies from your system if you wish.

Other Rights

For information about other rights you may have under applicable law, please see the **Individual rights** section of this privacy policy.

PERSONNEL

We collect personal information concerning our own personnel (partners, principals and staff) as well as individual contractors to administer the employment relationship and manage our business. Please refer to the privacy policies available on the Sororum's intranet for information on the collection and processing of your personal information in relation to your role with the Sororum.

SUPPLIERS (INCLUDING SUBCONTRACTORS AND INDIVIDUALS ASSOCIATED WITH OUR SUPPLIERS AND SUBCONTRACTORS)

Information Collection

We collect and process personal information about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage our relationships with our suppliers, to receive services from our suppliers, and, where relevant, to provide professional services to our members. The personal information we process about our supplier contacts is generally business card information and includes name, employer, phone number, email and other business contact details, and the communications with us.

With respect to individuals subcontracted to work for or with the Sororum, please refer to the relevant privacy policy available on the Sororum's intranet for information on the collection and processing of your personal information in relation to your role with the Sororum

SUPPLIERS (INCLUDING SUBCONTRACTORS AND INDIVIDUALS ASSOCIATED WITH OUR SUPPLIERS AND SUBCONTRACTORS)

Information Use

We use such personal information for the following business purposes:

Receiving services. We process personal information in relation to our suppliers and their staff as necessary to receive the relevant services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal information about those individuals that are providing services to us.

Providing professional services to members. Where a supplier is helping us to deliver professional services to our members, we process personal information about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our members (for example, where our supplier is providing people to work with us as part of the Sororum team providing professional services to our members).

SUPPLIERS (INCLUDING SUBCONTRACTORS AND INDIVIDUALS ASSOCIATED WITH OUR SUPPLIERS AND SUBCONTRACTORS)

Information Use (cont'd)

Administering, managing and developing our businesses and services. We may process personal information in order to run our business, including:

- managing our relationships with suppliers;
- developing our businesses and services (such as identifying member needs and improvements in service delivery);
- maintaining and using IT systems;
- conducting surveys;
- hosting or facilitating the hosting of events; and
- administering and managing our website and systems and applications.

Providing information about us and our range of services. Unless we are asked not to, we use business contact details to provide information that we think will be of interest about us and our services -- for example, industry updates and insights, other services that may be relevant and invites to events.

SUPPLIERS (INCLUDING SUBCONTRACTORS AND INDIVIDUALS ASSOCIATED WITH OUR SUPPLIERS AND SUBCONTRACTORS)

Information Use (cont'd)

Security, quality and risk management activities. We have security measures in place to protect our and our members' information (including personal information), which involves detecting, investigating and resolving security threats. Personal information may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal information as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal information.

Complying with any requirement of law, regulation or a professional body of which we are a member. As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal information.

SUPPLIERS (INCLUDING SUBCONTRACTORS AND INDIVIDUALS ASSOCIATED WITH OUR SUPPLIERS AND SUBCONTRACTORS)

Information Retention

Personal information will be retained about our contacts at our suppliers for as long as it is necessary for the purposes set out above (e.g., for as long as we have, or need to keep a record of, a relationship with a contact, which is for the duration of our relationship with a contact or their organisation). Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and in order to establish, exercise or defend our legal rights.

Information Disclosure

We may disclose personal information as described in the Information disclosure section below.

ATTENDEES OF SORORUM EVENTS

We may collect personal information from attendees and participants of Sororum sponsored events as described below. Unless separate privacy terms are provided to the attendee or participant at or in connection with the event, any personal information collected will also be treated in accordance with the section of this privacy policy that applies based on the attendee's or participant's relationship with the Sororum (e.g., business contact, member contact, supplier contact, job applicant). In addition, with respect to virtual events, please see the **Users of our websites and applications** section of this privacy policy.

Information Collection and Use

When we collect personal information in connection with Sororum sponsored events, such information is provided directly and voluntarily by or on behalf of the attendee or participant and includes the individual's business card information and other personal information specific to the event and any accommodations. We use such information to manage registration, attendance and participation at the relevant Sororum-sponsored event. We may also take photographs in public areas at our events and we may use these in our marketing materials.

ATTENDEES OF SORORUM EVENTS

Information Retention

Personal information will be retained about our event attendees and participants for as long as we have, or need to keep a record of, a relationship with such individuals. Personal information may be held for longer periods where extended retention periods are required by law, regulation, or professional standards and in order to establish, exercise or defend our legal rights.

Information Disclosure

We may disclose personal information as described in the **Information disclosure** section below.

In addition, where we are co-sponsoring an event, we may disclose your information to the other organisation(s) sponsoring or organising the event. For certain events we may also circulate participant lists amongst participants or sponsors.

Others who get in touch with us

We collect personal information (such as name, contact details and contents of the communication) when an individual gets in touch with us with a question, complaint, comment, survey response or other feedback. In these cases, we will only use the information for the purpose of responding to and keeping a record of the communication. We may disclose personal information as described in the **Information disclosure** section below.

SECURITY

The Sororum has implemented generally accepted standards of technology and operational security designed to protect personal information from loss, misuse, alteration or destruction. Only authorised Sororum personnel and the third parties described in this privacy policy are provided access to personal information and these employees and third parties have agreed to maintain the confidentiality of this information. Please note that in the unlikely event that we might need to contact you about a matter involving your personal information, we may email you about the matter.

INDIVIDUAL RIGHTS

Unsubscribe

Should you wish to unsubscribe from our mailing list or any registrations, we will provide instructions in the appropriate area of the Site or in communications to you.

Users of our Websites and Applications

Please see the Users of our websites and applications section of this privacy policy for additional information about your choices in relation to personal information we collect through the Site.

Individual Privacy Rights

In certain circumstances under applicable law, you may have the right to access your personal information, (including in a portable format if so requested), to correct your personal information, to delete your personal information, and/or to opt out of the sale of your personal information.

To submit a request relating to any of these rights, please use the details provided in the **contact us** section. We will respond to your request within a reasonable timeframe in accordance with applicable law.

We hope that you won't ever need to, but if you do want to complain about our use of personal information, please send us a message with the details of your complaint by using the details provided in the **contact us** section. Applicable laws may also give you the right to lodge a complaint with the data protection authority in your country.

INDIVIDUAL RIGHTS

Changes to this Privacy Policy

The Sororum may update this privacy policy at any time by publishing an updated version here. You can access the most current version of this privacy policy at any time on this site.

Contact Us

If you have questions about this privacy policy or about our privacy practices, please contact us by completing our contact form on www.thesorum.org.