

WHERE
GREAT
MINDS
MEET



Great Minds Event Management LLC

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Data Protection Policy of Great Minds Event Management LLC

All data of Great Minds Event Management LLC are served in CRM system. The data within the database is obtained by clients filling in their business information in forms to sign up for a specific event. The clients are informed that this information will be shared with the respective hosts and partners of each event. The clients are also informed that they can unsubscribe from the database at any time through easy one click unsubscribe buttons. Are database is compliant with both GDRG and EU laws. Each member of Great Minds Event Management LLC has their personal log in detail to CRM, with restrictive access to the database pertaining to their role. With exception of few authorized persons, no one has the right to export the data, and this is a system set up. Data is shared post each event with clients through authorized personnel only. The company staff our trained on our data protection policy, and this is reinforced through biannual trainings. There is an IT team which supervises and conducts annual audits of data health and wealth.

As we use the service of ActiveCampaign, our CRM provider, we comply to all their data policy and legal policies which cover GDRG, EU, and USA. This in term governs all our data collection and protection policies. All our data is housed in our ActiveCampaign CRM system, and thus all fall under, are controlled and managed by the CRM governing laws. Below are the site policies for your reference.

<https://www.activecampaign.com/legal>

In addition, we have our internal employee handbook, that included the basic data protection policies of the company.

Below is what is snapshot included in all employee's handbook and training:

Data Policy

GM follows the European and GDRG data policies. The company data:

1. All data obtained throughout employment period with the company is the property of GM and stored as business data and utilized as per discretion of client (data point) where applicable.
2. All data needs to be stored in the CRM and cannot be stored on personal files.
3. Data cannot be manipulated, falsified, exported, deleted, duplicated, or shared with 3rd parties outside of the organization except by members of team responsible for sharing customer data with them post events.
4. All data needs to be kept clean, updated, and guarded by all employees as valuable company asset at all times.
5. Personal data of clients including but not limited to (religion, sexual orientation, home address, affiliations, family information, etc.), cannot be collected, stored, or shared by anyone.



6. Client and prospect need to provide written consent for their data to be used for even(s) by either filling online registration form or email registration forms. All outbound marketing needs to be followed up by an inbound activity to clearly authorize the use and application of data.
7. Employees are not allowed to mass email or mass copy data for any purpose.
8. All marketing emails must be sent through the CRM marketing channels with unsubscribe options.
9. Clients must not object to their data being shared before sharing with 3rd party including sponsors.
10. Other than event sponsors and partners, data can never be shared or sold or given to anyone.
11. Employees need to understand the data protection laws of their clients depending on markets and governing laws and comply and uphold those laws.
12. Failure to comply with our strict data policy will subject employee to immediate dismissal.

13. Responsible controller/contact information

The controller responsible in accordance to data protection laws is (herein also called from time to time "Controller"):

Great Minds Event Management LLC - Office 311 – 313, Apex Atrium Motor City, Dubai, UAE.

If you have any questions or suggestions regarding data protection, please do not hesitate to contact us by email at info@gmevents.ae

14. Your rights as data subject

In case your personal data is processed, you are the data subject within the meaning of GDPR and you have the rights outlined hereafter.

Right of confirmation and access (Information)

Each data subject shall have the right granted by the European legislator to obtain from the Controller the confirmation as to whether or not personal data concerning him or her are being processed.

In case such processing occurs, the data subject may request access to the following information:

- the purposes of the processing of personal data;
- the categories of personal data concerned in the processing;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- where the personal data are not collected from the data subject, any available information as to their source;



the existence of automated decision-making, including profiling, referred to in Art. 22 (1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer in accordance with Art. 46 GDPR.

Right to rectification of inaccurate data

You have the right that GM events has to immediately correct or complete any personal data concerning you if it is inaccurate or incomplete. We as the controller would have to execute your request without undue delay.

Right to restriction of processing

You have the right that GM events has to restrict processing of your personal data subject to the following prerequisites:

The accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data.

The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use.

The Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims.

The data subject has objected to processing pursuant to Art. 21 (1) of the GDPR pending the verification whether the legitimate interests of the Controller override those of the data subject.

In case the processing of your personal data was subject to restriction, and notwithstanding their storage, such data shall only be processed with your consent or for the establishment, exercise, or defense of claims or for the procurement of the protection of rights of a natural or legal person or for purposes of an important public interest of the European Union or a member state.

In case the restriction of processing has been executed in accordance with the above, you shall be informed by the Controller prior to the cancellation of such restriction.

Right to erasure (“Right to be forgotten”)

a) Right to erasure



Each data subject shall have the right to request from the Controller the erasure of personal data concerning him or her without undue delay, and the Controller shall have the obligation to erase personal data without undue delay where one of the following reasons applies, as long as the processing is not necessary:

the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

the data subject withdraws consent to which the processing is based according to Art. 6 (1) lit. a GDPR, or Art. 9 (2) lit. a GDPR, and where there is no other legal reason for the processing;

the data subject objects to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate reasons for the processing, or - - the data subject objects to the processing pursuant to Art. 21 (2) GDPR;

the personal data has been unlawfully processed;

the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject to;

the personal data have been collected in relation to the offer of information society services referred to in Art. 8 (1) GDPR.

b) Information to third parties

Where the Controller has made personal data public and is obliged pursuant to Art. 17 (1) GDPR to erase the personal data, the Controller, taking into account available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other Controllers processing the personal data that the data subject has requested erasure of any links to, or copy or replication of, those personal data, from these controllers.

c) Exemption

The right to erasure does not apply where the processing is necessary:

for the exercise of the right of freedom of speech and information;

for the fulfilment of a mandatory legal obligation that is mandatory, according to European or the respective member state's law the Controller is subject to, or is necessary for the performance of a task carried out in the public interest or in execution of official authority given to the Controller;

for reasons of public interest in regard to public safety and health pursuant to Art. 9 Abs. 2 lit. h and i as well as Art. 9 (3) GDPR;



for archives in the public interest, scientific, historical or statistical purposes pursuant to Art. 89 (1) GDPR, insofar as the granted right mentioned in a) above would likely make the achievement of such purposes impossible or seriously endangered;

or for establishing, exercising or defending legal claims.

Right of information

In case you have claimed the right of rectification, erasure or restriction of the processing towards the Controller, the Controller is obliged to inform all recipients of personal data belonging to you such rectification, erasure or restriction accordingly, unless such information seems to be impossible or only possible by needing inappropriate efforts.

You are entitled to claim to be informed by the Controller about such recipients.

Right to data portability

You shall have the right to receive the personal data concerning you, which was provided to us as the Controller, in a structured, commonly used and machine-readable format. You shall also have the right to transmit this data to another Controller without hindrance from the Controller to which the personal data has been provided, as long as the processing is based on consent pursuant to Art. 6 (1) lit. a GDPR or of Art. 9 (2) lit. a GDPR, or on a contract pursuant to Art. 6 (1) lit. b GDPR, and

the processing is carried out by automated means.

Furthermore, in exercising your right to data portability, the data subject shall have the right to have personal data transmitted directly from one Controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

The right to data portability only applies as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

Right to object

Each data subject shall have the right to object, based on his or her particular situation, at any time, to processing of personal data concerning him or her, which is based of Art. 6 (1) lit. e, or f GDPR. This also applies to profiling based on these provisions.

GM events shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate reasons for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If GM events processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing.



If the data subject objects to GM events to the processing for direct marketing purposes, GM events will no longer process the personal data for these purposes.

In order to exercise the right to object, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

Right to withdraw data protection consent

You as data subject shall have the right to withdraw your consent to processing of your personal data at any time. Irrespective of such withdrawal of the consent, the legitimation of the processing of personal data until the withdrawal shall remain unaffected.

Automated individual decision-making, including profiling

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision

is not necessary for entering into, or the performance of, a contract between the data subject and a Controller, or

is not authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or

is not based on the data subject's explicit consent.

Notwithstanding the aforementioned, such decisions shall not be based on specific categories of personal data pursuant to Art. 9 (1) GDPR, insofar Art. 9 (2) lit. a or lit. g do not apply and in case that suitable measures to safeguard the data subject's rights and freedoms and legitimate interests were procured.

In view of the cases 1 to 3 above, the Controller shall procure suitable measures to safeguard the data subject's rights and freedoms and legitimate interests. This means that the Controller is at least required to procure the right to obtain human intervention on the part of the Controller, to express his or her point of view and contest the decision.

Right to file complaints with the regulatory authority

Notwithstanding any other administrative and judicial procedures, you shall have the right to file a complaint with a competent regulatory authority, in particular in the member state where you are situated, you have your place of work or where the alleged breach has occurred; if you believe that the processing of your personal data is a breach of the regulations set forth in the GDPR.

The regulatory authority, that has been approached by you, shall inform you about the status of the results of an investigation on an ongoing basis as well as about the possibility of a judicial procedure according to Art. 78 GDPR.