



# ROUNDTABLE

## INTERNATIONAL

# RTI Privacy Policy

## 1. Introduction

These terms and conditions of use apply to the website <http://www.round-table.org>. The website was created and is managed by Round Table International. Hereafter collectively referred to in this legal notice as RTI.

YOUR PRIVACY IS IMPORTANT TO US. PLEASE READ THIS PRIVACY POLICY TO LEARN ABOUT THE INFORMATION THAT WE RECEIVE FROM YOU OR YOUR TABLE AND HOW WE USE THAT INFORMATION.

BY USING THE SERVICES, YOU CONSENT TO THE USE AND TRANSFER OF YOUR PERSONAL DATA AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT USE THE SERVICES.

This Privacy Policy describes the information that we process (directly or indirectly) through the Services, why we process it, what we do with the information we receive, and how you can manage your Personal Data. This Privacy Policy does not apply to any application, website or other services that do not display or link to this Privacy Policy. This Privacy Policy is incorporated into and made a part of the Terms of Use. If you have not done so already, please also review the Terms of Use.

### [Terms of Use](#)

This privacy policy is for this website 'Round-Table.org' (RTI) and governs the privacy of its users who choose to use it. The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this policy.

## 2. Website

'Round-Table.org' and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience.

## 3. Use of Cookies

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for website's to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device. If you want to know more about cookies please read our cookie notice to get more details.

### [Cookie Notice](#)



# ROUNDTABLE

## INTERNATIONAL

### 4. Information we Process

**Personal Data** is information that directly or indirectly identifies you, such as your name, email address, date of birth and telephone number.

**Other Information** is information that, by itself does not individually identify you, such as browser type, operating system, the webpages you viewed and how long you viewed them. We generally do not treat Other Information as Personal Data unless required by applicable law. If we link together different types of Other Information, or link Other Information to Personal Data, we treat the linked information as Personal Data when it directly or indirectly identifies you or another person.

### 5. How we use information.

You may choose not to provide us with your Personal Data. If you choose not to provide your Personal Data, you may not be able to enjoy the full range of the Services.

We receive information:

**When you register for the Services:** When you register for the Services, we process Personal Data, including your name, email address, mobile telephone number, date of birth and encrypted password. If you are a member of RTI, we also process your Member ID, which may be Personal Data under certain laws.

**When you use the Services:** We receive information about the Services that you use and how you use them. We may also ask for information, some of which is Personal Data, so that we may keep you informed and provide you with information on upcoming events in your area or inform you of opportunities to support our missions. This information is not required to use the Services.

We provide areas in the Services where registered users can control the privacy settings or share certain communications (“submissions”) between users. We encourage you to exercise caution because we cannot control what other users may do with the information in your Submissions. Please see the Terms of Use for additional terms that apply to your Submissions.

**From Your Device:** If you accept cookies, we will receive information about your computer, tablet or mobile telephone (“Device”), such as model, operating system version, mobile network information, mobile telephone number, internet service provider and similar identifiers. We may associate your Device information with your RTI account. We may collect and store information (including your Personal Data) about your Device through a browser web and web application data caches.

If you enable location services on your mobile device, we may also process your geolocation information (“Location Data”) from your wireless carrier, through a wearable or other device you have connected (for example, a smart watch) to our Services, and/or directly from the Device on which you use our Services. Geolocation is not permanently stored. It is only used for targeting activities in your area.

If you are accessing the Services through the Round Table Family App, how we obtain location data will differ depending on your Device’s operating system. We do not collect location data unless you have “allowed” its collection in your Device’s operating system settings. If you decline to allow location data collection in the app, we will not collect your location data unless you manually enter it.

**Through Data Collection Technology:** We use cookies and similar technology (“**Data Collection Technology**”) to automatically collect gather information (including Other



# ROUNDTABLE

## INTERNATIONAL

Information) about you when you use the Services. Please read below to learn more about how we use Data Collection Technology.

**Through Server Logs:** A server log is a list of the activities that a server performs. Our servers automatically store in server logs search queries, hardware settings, browser type, browser language, the date and time of your request and referral URL and certain cookies that identify your browser or RTI account. Some of this information is gathered through Data Collection Technology in order to improve the Services.

### 6. How we process personal data

In this Privacy Policy, to “process” Personal Data means to perform any operation on Personal Data, whether or not by automated means, such as gathering, recording, organizing, storing, adapting, using, disclosing, combining, erasing, or destroying.

We process Personal Data:

- To set up and maintain your registration and account with the Services;
- To communicate with you;
- To deliver relevant content to you;
- To provide features through the Services, such as membership activities and service reporting;
- To prevent and investigate fraud and other misuses of the Services;
- To protect our rights and property;
- To operate, manage and improve the Services; and
- To ensure the technical functionality and security of the Services.
- We process Other Information:
  - To administer and improve the Services and your experience on the Services;
  - To analyze trends and gather broad aggregate demographic information;
  - To statistically monitor how many people are using the Services or opening our emails;
  - To develop, improve and protect the Services;
  - To conduct audience research;
  - To audit and analyze the Services; and
  - To ensure the technical functionality and security of the Services.

### 7. How we share information

We may process your Personal Data received via the Services as follows:

**Our Service Providers:** We share information with our third-party service providers that perform services on our behalf, such as event registration, Legacy Magazine distribution, and order fulfillment. These third parties are required to use your Personal Data only for the specific purpose for which it was provided and must agree to safeguard it in substantially the same manner as we have described in this Privacy Policy and in accordance with all applicable laws.

**In Connection with a Business Transaction:** We may share your Personal Data if we are involved in a merger, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control (in whole or in part). We require that the shared Personal Data remain subject to the promises made in the then-current Privacy Policy, unless and until you agree to new privacy terms.



# ROUNDTABLE

## INTERNATIONAL

**To Protect Legal Rights.** Applicable law may require us to disclose your Personal Data if: (i) reasonably necessary to comply with legal process (such as a court order, subpoena or search warrant) or other legal requirements; (ii) disclosure would mitigate our liability in an actual or threatened lawsuit; (iii) necessary to protect our legal rights or the rights of our users, customers, business partners or other interested parties; or (iv) necessary for the prevention or detection of crime (subject in each case to applicable law).

We may aggregate information received through the Services and remove identifiers so that the information no longer identifies or can be used to identify an individual ("**Anonymized Information**"). We share Anonymized Information with third parties and do not limit third parties' use of the Anonymized Information because it is no longer Personal Data. We will never sell or share your Personal Data, including but not limited to donor information collected online or offline, with any unrelated third parties.

### **8. Childrens Privacy**

The Services are not directed to or intended for use by children under the age of 13 ("Minors"). Consistent with the requirements of applicable law, if we learn that we have received any information directly from a Minor without his or her parent's verified consent, we will use that information only to respond directly to that Minor (or his or her parent or legal guardian) to inform the Minor that he or she cannot use the Services and subsequently will delete that information.

**Children below the age of 16:** For children under the age of 16 to use the Services consent must be provided by the holder of parental responsibility over the child. We shall make reasonable efforts to verify in such cases that consent is given by the holder of parental responsibility over the child.

**California Minors:** While the Service is not intended for anyone under the age of 18, if you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: [support@round-table.org](mailto:support@round-table.org). When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing. Removal of your content or information from the Service does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

### **9. Security of your personal data**

We take precautions intended to help protect information that we process but no system or electronic data transmission is completely secure. Any transmission of your Personal Data is at your own risk and we expect that you will use appropriate security measures to protect your Personal Data.



# ROUNDTABLE

## INTERNATIONAL

You are responsible for keeping your login information private. We will treat access to the Services through your account credentials as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

If we become aware of a breach that affects the security of your Personal Data, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, we will provide any such notice to you at your account's email address. By using the Services, you agree to accept notice electronically.

### **10. Retention of your personal data**

We retain Personal Data in identifiable form only for as long as necessary to fulfill the purposes for which the Personal Data was provided to us or, if longer, to (i) comply with law legal obligations, (ii) detect and prevent fraud, (iii) resolve disputes, (iv) enforce agreements, (v) take actions we deem necessary to protect the integrity of the Service or our users, and (vi) similar essential legal purposes.

If you have an online account with us, you may close your account at any time by contacting [support@round-table.org](mailto:support@round-table.org). After you close your account, you will not be able to sign in to the Services or access any of your Personal Data. You can open a new account at any time or re-activate your previous account by following instructions we will give you at the time you close your account. If you close your account, we may still retain certain information associated with your account for analytical purposes and recordkeeping integrity and as permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

### **11. Your choices about your personal data**

**Your Privacy Preferences.** Unless you are a resident of the EU or EEA, when you register for the Services, you consent to receive email messages from us. You may modify this consent later by visiting your account settings. You also may opt out of receiving marketing emails by clicking the opt-out request in each marketing email. (It may take up to 10 days for us to process an opt-out request.) You may not opt out of transactional emails, such as service announcements, administrative notices and surveys, or if you are an officer in a club, district, multiple district or international role, you may not be able to opt out of role-specific communications.

We may also deliver notifications to you directly. You can disable some of these notifications through your Device's operating system, through your account settings or by disabling the applicable Service.

Changing information in your account or otherwise opting out of specific email communications will only affect future activities or communications from us.



# ROUNDTABLE

## INTERNATIONAL

**Your Right to Review Your Personal Data:** If you would like to review the Personal Data that we maintains about you, please contact us in writing using the contact information below. Inquiries to review personal data can be sent to us by email at [support@round-table.org](mailto:support@round-table.org).

**Your Right to Correct or Delete Your Personal Data:** The easiest way to correct or delete certain Personal Data that you have provided to the Services is to log in to your account and enter the necessary changes to your user profile. Alternatively, your club president, club secretary, or a designated club or district administrator can update your information. You can also contact the Support at [support@round-table.org](mailto:support@round-table.org) to make changes. If you have additional questions regarding the correction or deletion of your Personal Data, please contact us at [support@round-table.org](mailto:support@round-table.org).

We will review your request but may not be able to grant access to or change or delete certain of your Personal Data. We will respond to your requests within the time allowed by all applicable data protection laws and will make every effort to respond as accurately and completely as possible. If we cannot provide access or correct or delete your Personal Data, then we will notify you within 30 days.

### **12. Onward transfer and consent to international processing.**

We have Personal Data processing practices designed to assure information is appropriately protected. Our primary data centers are in the United States but we may transfer Personal Data or other information to our offices or affiliates (single, sub- and multiple districts) outside of the United States. We also may employ service providers to perform functions on our behalf. If we disclose Personal Data to a third party outside of the United States, we will seek adequate assurances that any Personal Data that we provide is safeguarded in accordance with this Privacy Policy and the requirements of all applicable privacy laws.

If you are using the Services and are from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Data to RTI, with servers located in the United States. By providing your Personal Data, you consent to any transfer and processing in accordance with this Policy.

### **13 Complaints about how we process your personal data.**

If you have any complaints regarding how we process your Personal Data, please contact us at [support@round-table.org](mailto:support@round-table.org) with a detailed description of the complaint. We respond to complaints as soon as practicable, and in any event, within the time limits prescribed by law.

### **14. Changes to the privacy policy**

If we change this Privacy Policy, we will post the updated Privacy Policy and its effective date on this page. If we make material changes that reduce your privacy rights, we will notify you in advance by sending you an email and/or by posting a notice in the Services.



# ROUNDTABLE

INTERNATIONAL

## 15. Applicable law

These Terms are governed by the laws of the State of Illinois, without reference to its conflict of laws provisions, and any dispute arising out of or relating to this Privacy Policy or your use of the Services will be subject to the exclusive jurisdiction of the federal and state courts in the DuPage County, Illinois, other than for actions to enforce any order or judgment entered by such courts. Please see the Terms of Use for more information. This Privacy Policy does not create rights enforceable by third parties or require disclosure of any Personal Data about any specific user.

**For residents of the state of California,** Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to [support@round-table.org](mailto:support@round-table.org).

## 16. EU Privacy Notice

For residents of the European Union (EU) and European Economic Area (EEA) whose information has been knowingly collected by us, the following information applies to you:

### Introduction

This EU privacy notice ('EU Privacy Notice') should be read in conjunction with our Privacy Policy and Terms of Use, and provides further information as required under EU Data Protection Law on how we handle or process the personal data we collect and who we may share it with.

If you are an EU or EEA resident and we knowingly collect your personal information (also called 'personal data'), we will do so in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ('GDPR') and EU member state national laws that implement or regulate the collection, processing and privacy of your personal data (together, 'EU Data Protection Law').

This Privacy Notice also provides information on your legal rights under EU Data Protection Law and how you can exercise them.

### When personal data is collected

When you register for the Services, join a RTI or make a donation, we receive Personal Data, including your name, email address, mobile telephone number, and date of birth. If you are a member of RTI, we also receive your Member ID, which may be Personal Data under certain laws.

Because of the global nature of our organization and its structure of clubs, districts and multiple districts, we may hold and process personal data that is collected from clubs, districts and partner organizations around the world, including within the EU/EEA.



# ROUNDTABLE

## INTERNATIONAL

This also means that if you are a member or individual contact of this network resident in the EU/EEA, your personal data may be transferred from the EU/EEA to our headquarters in the United States.

US data privacy laws are currently not considered to meet the same legal standards of protection for personal data as set out under EU Data Protection Law. However, in order to safeguard personal data received from the EU/EEA, we only allow such a transfer of personal data to the US or other third countries under an approved contract or another appropriate mechanism which is legally authorized under EU Data Protection Law.

This is to make sure that the personal data that we receive and process (so far as it relates to residents of the EU/EEA) is properly safeguarded in accordance with similar legal standards of privacy you would enjoy under EU Data Protection Law.

### **The lawful grounds on which we receive and process personal data**

We process your personal data for the above purposes, relying on one or more of the following lawful grounds under EU Data Protection Law:

- (a) where you have freely provided your specific, informed and unambiguous consent for us to process your personal data for particular purposes;
- (b) where you have freely joined a chartered RTI thereby becoming a member of RTI, and your club must report certain personal data to RTI for purposes of membership administration and support;
- (c) where we agree to provide services to you as a member of a RTI, donor or other lawful purpose, in order to set up and perform our contractual obligations to you and/or enforce our rights;
- (d) where we need to process and use your personal data in connection with our legitimate interests as a global association and being able to effectively manage and operate our organization in a consistent manner across all territories. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right to privacy: and/or;
- (e) where we need to comply with a legal obligation or for the purpose of us being able to establish, exercise or defend legal claims.

Please also note that some of the personal data we may unintentionally receive and may include what is known as 'sensitive' or 'special category' personal data about you, for example, information regarding your ethnic origin or political, philosophical and religious beliefs. This is not the type of data that we or chartered Round Table clubs would routinely receive, but if we process such sensitive or special category data we will only do this in specific situations where:

- (a) you have provided this with your explicit consent for us to use it; or,
- (b) there is a legal obligation on us to process such data in accordance with EU Data Protection Law
- (c) it is needed to protect your vital interests (or those of someone else) such as in a medical emergency; or,
- (d) where you have clearly chosen to publicize such information: or,
- (e) where needed in connection with a legal claim that we have or may be subject to.





# ROUNDTABLE

INTERNATIONAL

## **Direct Marketing**

Individuals within the EU/EEA must opt-in to receive direct marketing communications. If we provide direct marketing communications to individuals in the EU/EEA regarding services and/or events which may be of interest, this will be done in accordance with EU Data Protection Law, and in particular where we contact individuals for direct marketing purposes by SMS, email, fax, social media and/or any other electronic communication channels, this will only be with the individual's explicit consent or in relation to similar services that the individual has purchased (or made direct enquiries about purchasing) from us before.

Individuals are also free to object or withdraw consent to receive direct marketing from us at any time, by contacting us at [support@roundtable.org](mailto:support@roundtable.org) or by selecting "unsubscribe" at the bottom of any marketing email received.

## **Disclosing your personal data to third parties**

We may disclose your personal data to certain third party organizations who are processing data solely in accordance with our instructions (called 'data processors') such as companies and/or organizations that support our business and operations (for example providers of web or database hosting, IT support, payment providers, event organizers, agencies we use to conduct fraud checks or mail management service providers) as well as professionals we use such as lawyers, insurers, auditors or accountants. We only use those data processors who can guarantee to us that adequate safeguards are put in place by them to protect the personal data they process on our behalf.

Other than as described above, we will treat your personal data as private and will not routinely disclose it to third parties without you knowing about it. The exceptions are in relation to legal proceedings or where we are legally required to do so and cannot tell you (such as a criminal investigation). We always aim to ensure that your personal data is only used by third parties we deal with for lawful purposes and who observe the principles of EU Data Protection Law.

## **Your personal data rights**

In accordance with your legal rights under EU Data Protection Law, you have a 'subject access request' right under which can request information about the personal data that we hold about you, what we use that personal data for and who it may be disclosed to as well as certain other information.

Usually we will have one month to respond to a subject access request. However, we reserve the right to verify your identity and we may, in case of complex requests, require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests. We may also require further information to locate the specific information you seek and certain legal exemptions under EU Data Protection Law may apply when responding to your subject access request.



# ROUNDTABLE

INTERNATIONAL

Under EU Data Protection Law. EU/EEA residents also have the following rights, which can be enforced by making a request in writing:

- (a) that we correct personal data that we hold about you which is inaccurate or incomplete:
- (b) that we erase your personal data without undue delay if we no longer need to hold or process it:
- (c) to object to any automated processing (if applicable) that we carry out in relation to your personal data.
- (d) to object to our use of your personal data for direct marketing:
- (e) to object and/or to restrict the use of your personal data for purpose other than those set out above unless we have a compelling legitimate reason: or
- (f) that we transfer personal data to another party where the personal data has been received with your consent or is being used to perform contract with you and is being processed by automated means.

So we can fully comply, please note that these requests may also be forwarded on to third party data processors who are involved in the processing of your personal data on our behalf.

If you would like to exercise any of the rights set out above, please contact us at the address below.

If you make a request and are not satisfied with our response, or believe that we are illegally processing your personal data, you have the right to complain to the Office of the Information Commissioner in the United Kingdom.

## **How long we retain your personal data**

We retain Personal Data in identifiable form only for as long as necessary to fulfill the purposes for which the Personal Data was provided to us or, if longer, to (i) comply with law legal obligations, (ii) detect and prevent fraud, (iii) resolve disputes, (iv) enforce agreements, (v) take actions we deem necessary to protect the integrity of the Service or our users, and (vi) similar essential legal purposes. This criteria takes in to consideration the reasonable expectations of those whose personal data we gather in these circumstances, taking into account various legislative requirements and guidance issued by relevant EU regulatory authorities. In accordance with the above retention policy, the personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it. For more information on how your data may be used, please see our Privacy Page.

## **17. Contact & Communication**

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process but advice users using such form to email



# ROUNDTABLE

## INTERNATIONAL

processes that they do so at their own risk. If you have any questions about our privacy protection practices or believe we have not adhered to this Policy, please contact us at [support@round-table.org](mailto:support@round-table.org). Additionally, if you are seeking information on how your personal data is processed, you can contact us.

### HOW TO CONTACT US

If you have any questions, comments, or concerns about how we handle your Personal Data, then please contact us as follows:

Telephone:

E-mail:

Postal Address:

30 Rue Marie-Adelaide  
L-2128 Luxembourg

### 18. External Links

Although this website only looks to include quality, safe and relevant external links users should always adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and it's owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### 19. Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertisers website through a referral program which may use cookies and will tracks the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

### 20. Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through



# ROUNDTABLE

## INTERNATIONAL

social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email. This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

### **21. Shortened Links in Social Media**

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy URL's [web addresses] (this is an example: <http://bit.ly/zyVUBo>). Users are advised to take caution and good judgment before clicking any shortened URL's published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URL's are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

### **22. Resources & Further Information**

- Data Protection Act 1998
- Privacy and Electronic Communications Regulations 2003
- Privacy and Electronic Communications Regulations 2003 – The Guide
- New EU cookie Law (e-Privacy Directive)
- Twitter Privacy Policy
- Facebook Privacy Policy
- Google Privacy Policy
- LinkedIn Privacy Policy
- Source: Club41.org

Created by Ben Kin, RTI IT-manager 2022-2023

Version 1.0

Publication date: Jul 2023

Last Updated: Jul 2023

