



GLOBAL SOF FOUNDATION PRIVACY NOTICE

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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Global SOF Foundation collecting/processing their personal data.
- 2.2 All Employees/Staff of Global SOF Foundation who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

The Global Special Operations Forces (SOF) Foundation (GSF) is a 501(c)(3) non-profit organization that aims to build and grow an international SOF network of military, government, commercial, and educational stakeholders in order to advance SOF capabilities and partnerships to confront global and networked threats.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Meaghan Keeler-Pettigrew
- +001-813-530-5184
- mkp@globalsoffoundation.org

The personal data we would like to collect from you is:

Personal data type:	Source (where Global SOF Foundation obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name (First, Middle, Last)	Website Form or Event Registration
Email Address	Website Form or Event Registration
Phone Number	Website Form or Event Registration
Mailing Address	Website Form or Event Registration
Country of Citizenship	Website Form or Event Registration
Military Affiliation	Website Form or Event Registration



The personal data we collect will be used for the following purposes:

- Sharing information about upcoming and past Global SOF Foundation events and activities, to include registration guidance.
- Maintenance of your Global SOF Foundation Membership, online account, and / or event registration.

Our legal basis for processing for the personal data:

- **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Direct Marketing
- Relevant and appropriate relationship
- Reasonable Expectations

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Global SOF Foundation to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us with your request at info@globalsoffoundation.org.

3.3 Disclosure

Global SOF Foundation will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third party (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
MemberSuite	Enhanced security measures	https://www.membersuite.com/gdpr
Constant Contact	Privacy Program meets GDPR data protection standards	https://www.constantcontact.com/legal/terms



3.4 Retention period

Global SOF Foundation will process and store the personal data until the data subject has taken no action within the Global SOF Foundation program for **ten years** or if otherwise requested by the data subject

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Global SOF Foundation refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Global SOF Foundation (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Global SOF Foundation’s data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Stuart Bradin	Meaghan Keeler-Pettigrew
Address line 1:	3690 W Gandy Blvd.	3690 W Gandy Blvd.



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Address line 2:	#140	#140
Address line 3:	Tampa	Tampa
Address line 4:	FL	FL
Address line 5:	33611	33611
Email:	sbradin@globalsoffoundation.org	mkp@globalsoffoundation.org
Telephone:	+001-813-530-5184	+001-813-530-5184

3.7 Privacy statement

Read more about how and why we use your data here

<https://globalsoffoundation.org/privacy-policy/>

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Global SOF Foundation, will collect and use your personal data for outreach and marketing purposes, to include fulfilment of event attendance, GSF Memberships, and/or Corporate Partnership.

Why does Global SOF Foundation need to collect and store personal data?

In order for us to provide you with membership or participation in Global SOF Foundation activities, we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Global SOF Foundation would contact you for additional consent.

Will Global SOF Foundation share my personal data with anyone else?



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We may pass your personal data on to third-party service providers contracted to Global SOF Foundation in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Global SOF Foundation's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Global SOF Foundation use the personal data it collects about me?

Global SOF Foundation will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Global SOF Foundation is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Global SOF Foundation contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organisation holds about me?

Global SOF Foundation at your request, can confirm what information we hold about you and how it is processed. If Global SOF Foundation does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Global SOF Foundation or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.



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- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Global SOF Foundation accepts the following forms of ID when information on your personal data is requested:

- Government issued picture ID, to include a driver's license, passport, or military ID card

Contact details of the Data Protection Officer / GDPR Owner:

	Data Protection Officer / GDPR Owner contact details
Contact Name:	Meaghan Keeler-Pettigrew
Address line 1:	3690 W Gandy Blvd.
Address line 2:	#140
Address line 3:	Tampa
Address line 4:	FL
Address line 5:	33611
Email:	mkp@globalsoffoundation.org
Telephone:	001-813-530-5184

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.



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A current version of this document is available to all members of staff on the Global SOF Foundation website.

Signature:

Date:

7/24/18

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Keeler-Pettigrew	24 MAY 2018
2	Finalized Footer POC	Keeler-Pettigrew	23 JUL 2018