

We are committed to respect your privacy and confidentiality.

CCI France Myanmar
Privacy policy

Introduction

Welcome to the French Myanmar Chamber of Commerce and Industry privacy notice.

CCI France Myanmar respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
3. **HOW IS YOUR PERSONAL DATA COLLECTED**
4. **HOW WE USE YOUR PERSONAL DATA**
5. **DISCLOSURES OF YOUR PERSONAL DATA**
7. **DATA SECURITY**
8. **DATA RETENTION**
9. **YOUR LEGAL RIGHTS**
10. **GLOSSARY**

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims at giving you information on how CCI France Myanmar collects and processes your personal data (including through your use of this website).

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

The French Myanmar Chamber of Commerce and Industry is the controller and responsible for your personal data (collectively referred to as CCI France Myanmar, "FMCCI" "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: The French Myanmar Chamber of Commerce and Industry

Name or title of data privacy manager: Mr. Guillaume REBIERE – Executive Director

Email address: director@ccifrance-myanmar.org

Postal address: Parkside One, 271/273 Bagayar Street, Sanchaung Township, Yangon, Myanmar

You have the right to make a complaint at any time to the relevant authorities. We would, however, appreciate the chance to deal with your concerns before you approach the relevant authorities so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in May 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

If you are a **visitor** to the Site or **prospective member**:

- First name;
- Last name;
- Email address;
- Job title and
- Company name.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

If you are a **member or client of the FMCCI**:

- **Identity Data** includes first name, last name, username or similar identifier, job title, title.
- **Contact Data** includes billing address, correspondence address, email address and telephone numbers.
- **Regulatory Data** includes relevant information as required by regulatory Know Your Client or Anti Money Laundering regulations. (HMRC)
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

If you are a **candidate** using our recruitment service:

- **Identity Data** includes first name, last name, username or similar identifier, job title, title.
- **Contact Data** includes correspondence address, email address and telephone numbers
- **Curriculum vitae**

- **References** from former employers

If you are a candidate, you accept, by posting your CV and other personal information online that this data appears on our website and that it might be visible to all visitors, or even on other websites, including but not limited to search engines. Since this data was voluntarily provided, posted and published by candidates, we do not control the content of this information, its accuracy or its veracity. We also do not take the decision of deleting this information from our website without the full consent or an official written request from the candidates. We shall not be held responsible if the information provided by a candidate remain visible on our website and subsequently on other websites, even becoming obsolete.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data,...). Nor do we collect any information about criminal convictions and offences.

Information about other people

If you provide information to us about any person other than yourself, your employees, your referees, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
This includes personal data you provide when you:
 - apply for Membership;
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our services or publications;
 - register as a candidate for recruitment services on our website;
 - request marketing to be sent to you; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- If you are a candidate using our recruitment service, we may also collect Personal Data from third parties, such as LinkedIn and references from former employers.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where we need to carry out requests made by you on the website or in relation to our services
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation;
- Where we provide support for the provision of our services, including the promotion of our Members on our website and in our communications.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data (depending on your relationship with the Chamber), and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please contact us if you need details about the specific legal grounds on which we are relying to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To promote you as a Member	(a) Identity (b) Contact (c) Description of activity (d) Marketing and Communications (e) Photos, videos, brochures (f) Links to website and over pages (g) Other data and files provided by you	(a) Performance of a contract with you
To register you as a new Member	(a) Identity (b) Contact	(a) Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our products/services)

To comply with our legal obligations	(a) Identity (b) Contact	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how members use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, member relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Members

Types of data: Identity, Contact, Profile, Position, Job Title, Presentation of company and activities, Financial and banking information, other information provided by you when applying for Membership and later on while still a Member of CCI France Myanmar

It reasonable to expect that if you have applied to a Membership at CCI France Myanmar, have filled in all the requested information, have sent other files and information, and have agreed, at the end of the Membership Application Form that CCI France Myanmar will use this data to promote you as a Member in its communications (website, Membership Directory, introductions to contacts...) and as part of its services, you consent to us collecting and otherwise use your personal data to offer or provide our services to Members, as described on our Website, in our Catalogue of Services, in our Membership Application Form, in our emailing campaigns, during our Annual General Meeting, and in any other support published by CCI France Myanmar.

Yet, as a Member of CCI France Myanmar, you can choose at any time, beginning by our Membership Application Form, which type of information about you and your company, you allow CCI France Myanmar to make public and to share in its communication. In order to do that, your request must be sent by email to Mr. Guillaume REBIERE, director@ccifrance-myanmar.org. CCI France Myanmar shall not be responsible for not following any request which would not have been done in writing, by email, to this address.

Candidates

Types of data: Identity, Contact, Curriculum Vitae, References

It is reasonable to expect that if you have sent us your Curriculum Vitae and personal information or uploaded them to our website, you consent to us collecting and otherwise use your personal data to offer or provide our recruitment services to you and share that information with prospective employers (members and/or clients).

Marketing

We need your consent for some aspects of these activities which are not covered by our legitimate interests (the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we will ask for this via an opt-in or soft-opt-in (which we explain further below). Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by virtue of your membership, attending a Chamber event). Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. You can opt out at any time by clicking on the unsubscribe button present in all our communications.

For other types of e-marketing, we are required to obtain your explicit consent.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside FMCCI for marketing purposes. Personal introductions by emails are not considered to be third-party marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you at any time.

Change of purpose

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

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

5. Disclosures of your personal data

We may have to share your personal data (depending on your relationship with the Chamber) with the parties set out below for the purposes set out in the table above.

- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- In relation to candidates using our recruitment services, we will share your personal data with potential employers.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

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

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you want to learn more about our specific retention periods for your personal data established in our retention policy you may contact us at director@ccifrance-myanmar.org.

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

For more information on these different rights, please refer to the Glossary here below.

If you wish to exercise any of your rights, please contact director@ccifrance-myanmar.org

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities in paragraph [Number].

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties:

- Service providers acting as processors based in France and/or Myanmar who provide IT and system administration services, marketing technology platforms.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Myanmar and/ or France who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the Myanmar who require reporting of processing activities in certain circumstances.
- Clients and members based in the Myanmar and/or France who are recruiting, as part of our recruitment service.

YOUR LEGAL RIGHTS

You have the right to:

1 Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.