



## Privacy Notice

Updated 22 January 2026

### 1. Who We Are

INSOL Europe collects, uses and processes certain personal data. When we do so we are regulated under the UK General Data Protection Regulation and the Data Protection Act 2018 (which apply in the United Kingdom), and where applicable the General Data Protection Regulation which applies across the European Union and we are responsible as the 'controller' of that personal data for the purposes of those laws.

We are a non-profit making organisation registered in France under reference number W750164977 and have our registered office at 106 rue La Boétie, 75008 Paris.

Our main trading address is PO Box 7149, Clifton, Nottingham NG11 6WD.

We are registered on the Information Commissioner's Office Register under registration number Z8067110 and act as the controller and our contact details are: Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org)

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and how to contact us and supervisory authorities in the event you have a complaint.

### 2. What is Personal Data?

Personal data is any information about you as an individual which enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers where you could be indirectly identified.

### 3. The Personal Data We Collect and Use

We may collect and use the following personal data about you:

- Your forename and surname
- Your date of birth
- Gender
- Your professional association details
- Your email
- Your mobile or landline numbers

- Your address
- Your individual/company website details
- Personal data relating to your profession
- Personal data relating to any membership to any professional body
- Personal data relating to any membership renewals
- Personal data you provide to us on a voluntary basis by using our website, our products or services
- Personal data you provide to us when you interact with us online, by phone, email or otherwise
- Events you have attended and your role, such as whether you were a speaker
- Whether your company has sponsored any of our events
- Contributions you have made to our publications
- Committee(s) you have been chairs of or involved with
- Financial data including bank account and payment card details. **Transaction Data** includes details about payments 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, device ID and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website or service feature in order to analyse general trends in how users are interacting with our website and services to help improve the website and our service offering.

Special categories of data including **health data** where you provide these to us (for example, when providing these details in an Online Registration Form for an event we are hosting).

#### 4. How we Collect your Personal Data

We may collect this information directly from you (for example, when you fill in online forms or event registration forms, interact with us by phone, post, email, via your user account, when you create an account on our website or applying to become a member, subscribe to our publications or contact us).

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar

technologies. Please see our Cookie Policy at Section 16 of our Terms and Conditions (<https://www.insol-europe.org/terms-conditions>) for further details.

We may also obtain your personal data from third parties or publicly available sources.

## 5. Why we collect the information and how we use it?

We will typically collect and use this information for the following purposes:

- In order to provide and manage your membership with us.
- To offer you and take appropriate administrative steps regarding your membership with INSOL International;
- To supply our products and services to you.
- In order for us to enter into a contract with you.
- In order to communicate with you. This may include responding to emails or calls from you.
- In order to supply you with information by email and/or by post that you have requested. You may un-subscribe or opt-out at any time by emailing Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org) or writing to us at our trading address.
- To manage and administer our business including internal record keeping.

With your permission, or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone or post with information, news, and offers on our products and services. We will not send you any unlawful marketing or spam. We will work to protect your rights and comply with our obligations under the GDPR, UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and where relevant you will have the opportunity to opt-out.

We may send you information about where it is lawful for us to do so:

- our services;
- conferences and events that you have registered for, or may be interested in attending;
- other products, e.g. newsletters, that we produce from time to time.

## 6. Reasons we can collect and use your Personal Data

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- a. The processing is necessary for our **compliance with our legal obligations**; or
- b. The processing is necessary for the **performance of a contract** we have entered into or are about to enter with you, such as to provide you with our products and services.
- c. We may use your personal data where it is necessary to conduct our business and pursue our **legitimate interests**, for example to prevent fraud and to enable us to give you a secure and more tailored customer experience, to improve our engagement with you and to improve our services and offerings. We may also process your personal data for the **legitimate interests** of us, INSOL International and you in offering you and taking appropriate administrative steps regarding your membership with INSOL International. When pursuing legitimate interests of us or third parties, we consider and balance any potential impact on you and your rights (both

positive and negative) before we process your personal data for the legitimate interests. We do not use your personal data for activities where our or third parties' interests are overridden by the impact on you.

- d. We rely on **consent** only where we have obtained your active agreement to use your personal data for a specified purpose. You are free to withhold the consent or withdraw it at any time.

## **7. INSOL Europe will comply with the GDPR data processing principles**

We will comply with the data protection principles when gathering and using personal information, namely that your personal data will be:

1. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
4. accurate and kept up to date ('accuracy');
5. not kept longer than necessary ('storage limitation');
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

## **8. Who we share your personal data with**

INSOL Europe may disclose your personal data:

- for others to find you as our member;
- to INSOL International in order that they may effectively administer your membership of that body;
- to third-party organisations (including online organisations) as part of meeting our contractual obligations with you or with them;
- to professional advisers and/or tax bodies for legal compliance reasons;
- where required by law, or in connection with legal proceedings, or for the prevention/detection of crime, or for the collection of tax;
- to law enforcement or other authorities if required by applicable law;
- to our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf.

## **9. Where we Hold and Transfer your Personal Data?**

We store your personal data primarily within the UK.

We may also store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein) or other countries that may not be deemed by the UK government to have data protection laws that are as strong as those in the UK or the EEA. These are known as "**third countries**". If any personal data is transferred to any of the third countries, we will take suitable steps to ensure that your personal data is treated with a similar degree of protection to the UK and the EU. In these cases we will use specific standard contractual terms approved for use in the UK and/or EU which give the transferred personal data similar protection as it has in the UK, namely the "International Data Transfer Agreement" or "The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers" or the "standard contractual clauses". To obtain a copy of these contractual safeguards, please contact us using our contacts provided in this privacy notice.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including: transferring it using SSL and storing it in encrypted form.

If you would like further information please contact Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

## 10. Your Rights

Under the GDPR you have a number of rights. In summary, those rights include the following:

1. **Right of access to your personal data** – you have the right to request a copy of the personal data that we hold about you. Please refer to clause 11 regarding Subject Access Request (SAR) below
2. **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete, although we may need to verify the accuracy of the new data you provide to us.
3. **Right to Erasure** – in certain circumstances you can ask for the personal data we hold about you to be erased from our records.
4. **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
5. **Right to object** – you have the right to object to certain types of processing. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
6. **Right to be informed** – you have the right to be informed regarding how your personal data is being processed (including the right to be notified by us of any erasure, rectification or restriction of processing of your personal data). We may use automated decision making for administrative functions such as sending automated late payment invoices and notices.
7. **Right to complain** – in the event that we refuse 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 below 'complaints'.

For further data on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Data Commissioner's Office (ICO) on individuals rights under the UK General

Data Protection Regulation.

If you wish to exercise any of your above rights, it may help us to process your request more quickly if you:

- contact Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org)
- let us have enough information and evidence to identify you (e.g. name, membership number and other information we request)
- let us know the data to which your request relates including any account or reference numbers, if you have them.

If you would like to unsubscribe from any newsletter you can also click on the 'unsubscribe' button at the bottom of the relevant newsletter.

### **11. Subject Access Request (SAR)**

You have the right to access personal data that we process about you (subject to certain exemptions) and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, data about the source

If you want to know what personal data we have about you, you can ask us, free of charge, using what is called a "subject access request" for details of that personal data and, if we do hold such personal data, for a copy of it.

If your request is 'manifestly unfounded or excessive' (for example if you repeatedly ask for the same information) then we may charge you to cover our administrative costs in responding.

We will do our best to respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required.

Please contact Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org) if (in accordance with applicable law) you would like to exercise the above stated rights or if you have any questions about this notice.

### **12. Safeguarding Measures**

INSOL Europe takes appropriate measures and precautions to protect and secure your personal data from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including SSL and other industry standard encryption.

Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### 13. Consequences of Not Providing Your Data

Members are required to provide us with personal data. If you do not do so we may not be able to fulfil our commitments to you.

### 14. How Long We Keep Your Personal Data

INSOL Europe only retains personal data for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

### 15. Lodging A Complaint

We hope that we can resolve any query or concern you raise about our use of your information.

In the event that you wish to lodge a complaint about the processing of your personal data or you are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority and Paul Newson, Email: [paulnewson@insol-europe.org](mailto:paulnewson@insol-europe.org)

|               | Information Commissioner's Office                            | INSOL Europe   |
|---------------|--|--|
| Contact Name: |  | Paul Newson  |
| Website:      | <a href="https://ico.org.uk">https://ico.org.uk</a>          | <a href="http://www.insol-europe.org">www.insol-europe.org</a>               |
| Email:        | <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a> | <a href="mailto:paulnewson@insol-europe.org">paulnewson@insol-europe.org</a> |
| Telephone:    | 0303 123 1113  | +44 7951 022978  |

### 17. Changes to this privacy notice and your duty to inform us of changes

We may change this privacy notice from time to time, and updates will be published on our website.

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, for example a new address or email address.

### 18. Third-party links

Our website and other materials 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 policy of every website you visit.