

European Federation of Energy Traders Website

Privacy and Cookie Policy

Version 05.06.2014

The European Federation of Energy Traders (“**EFET**”) is committed to protecting and respecting your privacy. This Privacy and Cookie Policy (the “**Policy**”), together with our General Terms of Use and any other documents referred to in it) sets out the basis on which any personal data which EFET collects about you, or that you provide to EFET, will be processed by us. The Policy shall apply to all users of www.efet.org and www.efetacademy.org (collectively the “**Website**”), and to users of the EFET Document Ratification System (the “**EDRS Platform**”) from the date that they first apply for an account for the EFET online ratification platform.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the Dutch Data Protection Act (*Wet bescherming persoonsgegevens*) (the “**Act**”) and the website defined below, the data controller is EFET of Amstelveenseweg 998, 1081 JS Amsterdam, The Netherlands.

1. Information we may collect from you

EFET may collect and process the following data about you:

- Information that you provide by filling in forms on our sites including without limitation information provided as part of applying to access registration-dependent parts of the Website including the Member’s Section, EFET Academy and the EDRS Platform. The information you give EFET may include your name, address, organisation name, job title, e-mail address, telephone number and payment details (where relevant).
- If you subscribe to our daily and weekly email update service, we will keep a record of your name and email address.
- If you contact us by email, telephone or otherwise, we may keep a record of that correspondence.
- If you upload documents to the EDRS Platform, we will store any personal information contained in these documents including your name, job title and signature.
- Information provided as part of a job application or other employment-related enquiry.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to the Website including any resources that you access, full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time), page response times, download errors, and page interaction information. EFET may also collect technical information such as the Internet protocol (IP) address used to connect your computer to the Internet, your login information, operating system and platform.

2. Cookies and other tools

2.1 We may collect information about your visits to the Website by using a “cookie” or similar technologies for storing information, such as local shared objects and web beacons, which we refer to collectively in this Privacy Policy as “**cookies**”. A cookie is a small text file which is transferred to and stored on your computer, portable device or mobile. Cookies can be unique to your web browser and contain text and information such as a unique identifier, site name, digits and numbers. The information collected and stored is statistical data about our users' browsing actions and patterns and we do not use it to identify any individual.

2.2 Cookies are used to differentiate one user from another, to pass information from page to page during their visit to the Website and to collect data about a given browser, along with the information requested and sent by the browser's operator (the visitor). They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise the Website according to your individual interests.
- To recognise you when you return to our site, in particular, if you are accessing registration-dependent parts of the Website.

2.3 You may at any time refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the Website.

2.4 By using the Website you are consenting to our use of cookies.

What cookies do we use?

2.5 We use two different types of cookies on the Website: session cookies and persistent cookies. Session cookies are temporary files that only remain in the cookie file of your internet browser until you leave the Website. Depending on the cookie type, persistent cookies can remain for periods ranging from hours to years in the cookie file of your internet browser after you leave the Website and after your internet browser is closed.

2.6 The cookies we use are ‘analytical’ cookies (in particular, we use Google Analytics which provides us with meaningful reports on how visitors use the Website). The cookies we use are “first-party cookies” which means that they are set by the Website when you visit and the data collected by these cookies cannot be altered or retrieved by any service on another domain or by any third party.

2.7 Our uses of cookies basically fall into three categories:

- those that are strictly necessary to deliver the services and products you have requested
- cookies related to the performance of the Website, such as Google Analytics
- cookies related to the functionality of the Website, such as recognizing EFET Members logging in to member-only sections of the Website, or recognizing EFET Academy

participants who have tendered payment.

2.8 The following table lists the principal cookies used on the Website, their purpose and the time they will be stored on your computer, portable device or mobile:

Cookie	Operation and Purpose	Is this a session or persistent cookie?
__utma	<p>This cookie is typically written to the internet browser on your first visit to our website from that internet browser. If the cookie is deleted from by the internet browser operator, and the internet browser subsequently visits our website a new __utma cookie is written with a different unique ID.</p> <p>This cookie is used to determine unique visitors to our website and is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure the validity and the accessibility of the cookie as an extra security measure.</p>	persistent
_ utmb	This cookie is used to support analysis of how long visitors stay on our sites, in anonymous form.	session
__utmc	This cookie is used to support analysis about how visitors use our site, in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	session
__utmz	This cookie is used to support analysis about how visitors use our site, in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	persistent
BCSI-CS	This is used to measure how many visitors arriving at our website go on to read other pages.	session

2.9 For further information about Google Analytics, including in particular the use of __utma, __utmb, __utmc and __utmz cookies, please visit:
<http://www.google.com/analytics/learn/privacy.html>

How can you change your cookie preferences?

2.10 You may at any time refuse to accept or block cookies by activating the setting on your internet browser which allows you to refuse the setting of cookies. You may also be able to change the setting on your internet browser so that only particular types of cookies will be accepted.

2.11 If you would like to know more about cookies, including local storage devices, the following websites provide useful information:

- www.allaboutcookies.org
- www.youronlinechoices.eu
- <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>.

2.12 For a video about cookies visit www.google.co.uk/goodtoknow/data-on-the-web/cookies. You can also opt out of being tracked by Google Analytics across all websites by visiting <http://tools.google.com/dlpage/gaoptout> to find out how.

2.13 Please note, if you change your settings, you may be unable to access certain parts of the Website.

3. Where we store your personal data

3.1 The personal data that EFET collects from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by staff operating outside the EEA who work for EFET. Such staff may be engaged in, among other things, the processing of your payment details (if you have supplied any to us), the provision of support services and the review of documents uploaded by you to the EDRS Platform. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

3.2 You acknowledge and understand that the transmission of information via the internet is not completely secure. Although we will take reasonable and appropriate steps to protect your personal data once we have received it, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

4. Uses made of the information

We use information held about you in the following ways:

- To ensure that content from the Website is presented in the most effective manner for you and for your computer.
- To provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

- To administer the Website and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep the Website and the EDRS Platform safe and secure.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To carry out our obligations arising from our role as agent for participating parties.
- To administer and facilitate the functioning of the EDRS Platform, in particular by making any Ratification Letter available for inspection by other EDRS Platform users.

5. Uses you may make of information

5.1 To the extent that you obtain personal data about other EDRS Platform account holders or Ratification Letter signatories, you agree that such information may only be used by you (including the organisation you represent) for the purpose of confirming the validity of the ratification process.

6. Disclosure of your information

6.1 Subject to applicable legal restrictions preventing us from doing so (including confidentiality and information barriers), we may disclose your personal information to any member of EFET.

6.2 Similarly, subject to applicable legal restrictions preventing us from doing so (including confidentiality and information barriers), we may disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of EFET, our personnel, our members, other participating parties, or others. This could include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may employ other companies to perform tasks on our behalf, such as payment processors, and need to share some of your information with them in order to provide our products and services to you. Unless we notify you otherwise, these companies are not permitted to use the personal information we share with them beyond what is strictly necessary to assist us in taking payment from you or your organisation.
- If you upload a document to the EDRS Platform, at which point any personal data included in such document, in particular regarding the signatories, will become immediately available for viewing by other users of the EDRS Platform and other EFET Members.

8. Security and Passwords

To gain access to the EDRS Platform or the EFET Academy, you will be provided with a username and password. You are entirely responsible for maintaining the confidentiality of your access details and for all activities that occur under your account. You must not share your access details with any third parties.

9. Your rights

9.1 You have the right to ask us not to process your personal data for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data. You may also exercise any such right at any time by contacting us at secretariat@efet.org.

9.2 The Website may, from time to time, contain links to and from the websites of our member organisations and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. Access to information

Where it applies, the Act gives you the right to access information held about yourself, subject to certain exemptions. Your right of access can be exercised in accordance with the Act (an access request may be subject to a fee). You may contact us about the right at any time at secretariat@efet.org; it would assist us if you use the subject line “subject access request”.

11. Changes to our policy

Any changes we may make to our Privacy and Cookie Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

12. Contact

Questions, comments and requests regarding this Privacy and Cookie Policy should be addressed to secretariat@efet.org.