



AFRICA-CHINA
CENTRE FOR POLICY & ADVISORY

PRIVACY POLICY

MARCH 2024



Start Here!

This privacy policy ("**Privacy Policy**):

- Describes how we gather and protect individually identifiable information ("Personal Information").
- How we use, process, transfer, and share Personal Information.

This Privacy Policy applies to Personal Information that we collect through any means, including the ACCPA website, digital advertising, events and conferences, employment processes and direct interactions with ACCPA representatives.



Summary of Key Points

- By using the Site or providing Personal Information to us you consent to our processing and transfer of your Personal Information.
- We collect Personal Information when you provide information to ACCPA through the Site or our Mobile Apps, when you sign up for ACCPA information through digital advertising, or through other communications with ACCPA and ACCPA representatives. We use Personal Information to provide ACCPA products and services to you.
- We transfer Personal Data to jurisdictions outside of your home country as necessary for the purposes described in this Policy, including to jurisdictions that may not provide the same level of data protection as your home country.
- We use cookies and other technologies to track the use of our Site and for advertising purposes.
- We maintain reasonable and appropriate technical, physical, and administrative measures to protect the security of your Personal Information.
- Our Site and Mobile Apps may have links to other sites that we do not control. Their privacy policies may differ from ours. We encourage you to read the privacy statement of any website you may visit.
- If we make any material changes to our privacy practices, we will post a prominent notice on our Site notifying users of the change.
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Consent

By using the Site or otherwise providing us with Personal Information you consent to our processing and transfer of your Personal Information as we describe here.

If you provide us with “sensitive” Personal Information, which includes information like:

- Ethnic or racial origin
- Religious or philosophical beliefs, and/or
- Health or medical conditions;

Providing us your information constitutes your consent to the collection, use, transfer, and sharing of that information for the purposes described in the record where you provide the information and in this Privacy Policy.

Cross-border data transfers

- We transfer Personal Data to jurisdictions outside of your home country as necessary for the purposes described in this Policy, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers.
- If you are located in a country other than the Ghana, you consent to the transfer of your Personal Information to us in the Ghana, to third party data processors located in Ghana that we select. Other countries may not provide a level of data protection to your Personal Information equivalent to that provided by your home country.

The information we collect

We collect Personal Information to help us better understand your needs, to provide you with personalized and efficient service, and for other purposes described in this Privacy Policy.

We generally obtain Personal Information directly from you. We also may obtain Personal Information automatically, through the use of cookies and other technologies, and in some instances from third parties. We do not knowingly collect any Personal Information from children under the age of 16,



and users under the age of 16 should not submit any Personal Information to us.

Bases for Processing

Our bases for processing your Personal Information are:

- Contractual Necessity
- Legitimate Interests of ACCPA
- Compliance with Legal Obligations
- Where necessary, Consent

Before we process Personal Information on the basis of the legitimate interests of ACCPA we review our processing in light of the interests and fundamental rights and freedoms of the data subject taking into account their reasonable expectations.

Where we believe those interests or fundamental rights and freedoms override our legitimate interests, we will seek another valid basis for processing your Personal Information or refrain from that processing activity. Examples of our “legitimate interests” for processing your Personal Information include (but are not limited to):

- Processing for direct marketing purposes or preventing fraud
- Transmission of personal data for internal administrative purposes
- Processing for the purposes of ensuring network and information security
- Reporting possible criminal acts or threats to public security to a competent authority

Information you provide to ACCPA

You may provide Personal Information to ACCPA in a number of ways, including: (1) through your use of the Site, such as registering for an account and signing up to receive newsletters; (2) through data collection forms on ACCPA’s website or other digital advertising; (3) upon registering for any ACCPA educational offering; (4) upon communicating directly with ACCPA either electronically or by providing hard copies of documents; and (5) upon registering for ACCPA conferences or events.



The Personal Information we collect

Listed below are the classes of Personal Information that we collect. Please note, however, we do not collect all this Personal Information from everyone:

- Contact Data (name; personal contact information (phone, email address, physical address))
- Financial information
- Credit card data
- Gender
- Birthdate
- Passport information
- Educational background
- Criminal history
- Civil liability history
- Professional complaints, or investigations
- Reference letters
- Government identification number
- Health information
- Dietary needs
- Religious affiliation
- Work experience
- Professional conduct statement by employer/sponsor
- Username
- Password
- Video recordings
- Individual's status in ACCPA's programs
- Behavioral data (how members use our content and offerings)
- Work location
- Job/position title
- Work contact data (telephone and fax numbers and email address)
- IP Address or Mobile Device ID
- Referring website
- Clear GIFs
- Type of Browser
- Type of Operating System



Purposes for which we use Personal Information

The purposes for which we process your Personal Information are listed below:

For visitors to the Site:

- General account management and ACCPA administration
- Marketing
- Website Management
- Website Improvement

Cookies and Other Tracking Technology

Our Site and Mobile Apps use cookies and other tracking devices to collect information automatically which we may use for purposes outlined in this Privacy Policy such as targeted advertising. These tracking devices may be placed by us or by our third-party partners or vendors.

By using the Site, you agree to the use of cookies and other tracking devices as described below. You may configure your internet browser to notify you when a cookie is sent (giving you the option to decide whether to accept it or not), and to reject or remove cookies. To remove cookies, please follow your browser's instructions or contact your browser provider for more information.

You may also manage many of the cookies on our Site through your Profile. By removing or refusing to accept cookies, you may be unable to use or access some features of our Site.

Cookies

Cookies are small pieces of information that a website transfers to your computer. Our Site uses session ID cookies (expire when you close the browser) and persistent cookies (persist even after you close the browser), which help our Site run more smoothly and tailor content for you. Our Site includes a mechanism to manage the cookies that we use on our Site through your Profile. Additionally, most web browsers have options that allow you to control whether to accept cookies and give you the option to delete all cookies. However, disabling may prevent access to some parts of our Site. Do Not Track Signals: If you wish to not be tracked during your visit to our Site, please follow your browser's "Do Not Track" instructions or contact your browser provider for more



information. By sending a Do Not Track Signal, you may be unable to use or access some features of our Site.

Device IDs

Some portions of this Site and our mobile app collect and store a unique device ID associated with your particular device to track the number of unique visitors using our Site or mobile applications and to enable you to interact with and use those resources. We link your device ID with the technical information accessed through your use of our Site or the mobile application for the uses described in this Privacy Policy.

Clear Gifs (Web Beacons/Web Bugs)

Our Site may employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), which helps us to better manage content on our Site by informing us what content is viewed or clicked on. Clear gifs are tiny graphics with a unique identifier similar in function to cookies. In contrast to cookies, which are stored on a visitor's computer, clear gifs are embedded invisibly on web pages and e-mails and are about the size of a period.

Log Files

We also gather Personal Information automatically and store it in log files. For instance, when you visit our Site or use our mobile app, the server may automatically recognize information about you, including: the date and time you visited our Site, the pages you visited, the referrer (the website you came from), the type of browser you are using (e.g., Firefox, Internet Explorer), the type of operating system you are using (e.g., Windows or Mac OS), and the domain name and address of your internet service provider.

How we share information

Third Party Processors and Transaction Processing

We engage third parties to perform services in connection with the operation of this Site and our organization. Examples of these third parties include website hosting service providers, testing vendors, technology service providers, payment processors, legal advisers and consultants, examination testing and/or related services

We share Personal Information with these third parties, but we authorize them to use this Personal Information only in connection with the services they perform on our behalf. Such parties are bound by contract to establish appropriate measures to protect your Personal Information from unauthorized



access, use, or disclosure. In addition, we share certain Personal Information with third parties as necessary to facilitate our offering of products and services to you.

Digital Advertising and Remarketing

ACCPA uses remarketing services (sometimes called interest-based advertising) to show relevant content on sites across the internet to previous visitors to our Site (as described below in “online behavioral advertising”) and email subscribers. These services allow us to tailor our advertising and marketing content so that it is relevant and suits your needs. If you have consented to receiving marketing communications from us, we may share certain pseudo-anonymized (hashed) portions of your Personal Information (e.g., your email) with social media and e-commerce platforms such as Facebook, Instagram, LinkedIn, Verizon Media and Amazon. If you have an account on one of these platforms, this data sharing facilitates delivery of ACCPA advertising or messages while you are using those social media networks.

Event Attendees

For some ACCPA events, we may make certain Personal Information of all event attendees available to other event attendees and event sponsors. The Personal Information made available may include name, employer, address, and email address.

Legal Compliance

We share Personal Information of ACCPA with government regulators in connection with reporting obligations. We also share Personal Information as required by law or at the request of government regulators or other law enforcement officials and the courts.



Accessing and updating your Personal Information

Security

We maintain reasonable and appropriate technical, physical, and administrative measures to protect the security of your Personal Information. Access to Personal Information is limited to only those employees, contractors, or authorized agents of ACCPA who have authorization to access such Personal Information and such access is limited to the extent such information is needed to fulfil the task for which the Personal Information was collected. While we strive to protect your Personal Information, we cannot ensure the security of the information you transmit. We recommend you take every precaution in protecting your Personal Information when you are on the internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser.

Links

This Site and our Mobile Apps provide links to websites or services created and maintained by other individuals or organizations. Please note that these websites' privacy policies may differ from this Privacy Policy. We encourage you to read the privacy statement of any website you may visit, as we are not responsible for such websites' content and policies. We do not control these links or sites nor are we responsible for the accuracy, timeliness, security, or continued availability or existence of the information provided on these sites. Other organizations linked from the Site or our Mobile Apps may collect information about you when you visit their websites. We cannot control this collection of information. You should contact these companies directly if you have any questions about how they use the information they collect.

Changes to this Policy

Except where limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on this Site, and, if required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date above. You



are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site.

If we make any changes to this Policy that materially and adversely impacts previously collected information about you, we will obtain your consent for processing information previously collected about you in such a manner.

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