

# **Institute of International Container Lessors, Ltd. ("IICL") Privacy Policy**

This privacy policy is effective September 29, 2021. The IICL ("we" or "us") respects the privacy of customers, prospective applicants for certification, and others who use our website, products and services.

IICL is the leading trade association of the container and chassis leasing industry. The IICL's membership engages in leasing marine cargo containers and chassis to vessel operators and other organizations on a broad international basis. Members own or manage a significant portion of the global leased container and US chassis fleets. IICL is a Delaware (USA) Corporation, which maintains its headquarters in Washington D.C.

IICL is recognized as a non-governmental organization by the International Maritime Organization, is active with the International Organization for Standardization, World Customs Organization, the UN Economic and Social Council, and the UN Conference on Trade and Development as well as regulatory organizations around the world.

IICL provides information about the industry to its members through this website and other means. IICL also offers and conducts container and chassis inspectors' certification examinations once a year around the world in over 70 test centers. While self-study of selected manuals and technical bulletins are required, IICL also offers training classes that can supplement the students' industry knowledge and assist in preparation for the exams. A certification is valid for five years after which an inspector must pass the examination to become re-certified.

This privacy policy describes how we collect, receive, use, share, and protect personal information about you as well as the choices you can make about your personal information and how you can contact us.

## **Scope**

This policy applies to all information directly collected from individuals or received by us about individuals from our service providers and business partners from which an individual can be identified ("personal information"). Our website, products and services are accessed and utilized by individuals throughout the world about whom we obtain personal information. We process and store such information in the United States as do our service providers.

This policy does not cover data from which individual persons cannot be identified. This privacy policy also does not cover third parties and their websites that may be linked to our sites or referred to on this site, including our service providers. These third parties have their own privacy policies, and we encourage you to read and review them.

## **Collection, Receipt and Disclosure of Personal Information**

In general, you may visit our website without providing any personal information. We or our service providers may use "session cookies" on our website. Session cookies are text strings that a browser and Web server exchange. Our session cookies are stored in memory only until the browser session is closed. We use this information from visits to our website to help us maintain user status between webpages and to enhance the effectiveness of our website and customer service.

However, in order to register for or take a certification test, or to sign up for a preparatory class, we require you to provide certain personal information. This information may include your name, email address, phone number, company name, type of company, area of responsibility, job title, years or experience, digital signature, photograph and a palm vein scan, physical address, fax number. This information may be collected directly by IICL or by our service provider. If collected by IICL it may be transferred to our service provider. IICL and our service provider may retain such information for up to five years.

In addition to this registration and identity verification information, because payment will be required, we also will collect information necessary to process a credit card transaction or to enable payment by check or wire transfer. This information may be collected directly by IICL or by our service provider or merchant vendor. Insofar as your personal information is first collected by our service provider, it will be subsequently transferred to us and may be retained by the service provider as well. We may retain such information for up to five years. We may provide email addresses to a service provider in order to provide you with update notifications and to promote products and services that we believe you may find of interest. We also may use the personal information you provide for internal purposes such as administration and operation of our website, data analytics, accounting and compliance with legal obligations and procedures.

With regard to certification testing, at the test center our service provider may collect your signature, photographic image, palm vein image digitally, and you may be audio and-or videotaped while taking the test. Our service provider also may collect and score your test responses and then derive a test score and generate a report about your certification. This information may be transferred to us and may be stored by the service provider as well. We will retain test results and related information for five years.

## **Choice**

You are never required to provide us with your personal information. If you do not agree to this privacy policy please do not provide, transmit or allow an authorized third party to provide or transmit your personal information to us or our service provider. However, if you decide not to provide us with your personal information, we may be unable to allow you to register to take a certification test, participate in a preparatory class, or to receive other materials, products or services from us.

If you provide personal information, then you expressly agree that we may collect or receive, use, process, disclose transfer and retain your personal information as described herein. This includes the transfer of personal information on individuals outside the United States to us or our service providers in the United States.

We will use your personal information only for the purposes set forth herein. We will give you an opportunity to choose opt-out if your personal information is used for a purpose that is materially different than that for which it was originally collected or subsequently authorized by you. The only exception to this choice would be where we are required to disclose your personal information pursuant to governmental or judicial order, law or regulation to meet national security or law enforcement requirements. At a minimum, you will always be able to opt out from receiving marketing materials from us.

It is your responsibility to read this privacy policy and check for updates on a regular basis. By continuing to use our website, testing, classes, or other materials products or services after such updates have been made, you are agreeing to be bound by any changes to this privacy policy.

Personal information also may be transferred in connection with the business transition such as a merger or acquisition, insolvency or asset sale involving IICL. Should such a transaction occur we will use reasonable efforts to direct the transferee to use personal information you provided to us in a manner that is consistent with our privacy statement.

## **Security**

We maintain reasonable and appropriate administrative, technical and physical safeguards to protect personal information against loss, misuse or unauthorized access, disclosure, alteration and destruction. However, IICL and its service providers conduct business and administer certification tests throughout the world. It is possible that information transmissions to our site or that of our service provider an email sent to us or our service provider may not be secure.

## **Data Integrity and Purpose Limitation**

We take reasonable steps to ensure that personal information is reliable for its intended use and is accurate, complete and current. We will only collect and retain Personal Information which is relevant to the purposes for which the information is collected, and we will not use it in a way that is incompatible with such purposes unless such use has been subsequently authorized by you.

All IICL employees must abide by the IICL's Privacy Policy. Only authorized employees are permitted to have access to personally identifiable data about website visitors and that access is limited to what is reasonably needed to perform an employee's responsibilities, such as providing updates or notices or customer service. Employees who violate our privacy policies are subject to disciplinary action, up to and including termination.

## **Accountability for Onward Transfer**

**We have in place privacy protection control contractual obligations/understandings with our vendors designed to ensure that personal data is processed for limited and specified purposes and is protected from unauthorized access or disclosure.**

We will not transfer Personal information originating in the EU or the UK to third parties unless such third parties have entered into an agreement in writing with us requiring them to provide at least the same level of privacy protection to your Personal Information as required by the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF.. Such third parties will also be required to notify us if they determine they can no longer provide the same level of privacy protection as required by the Principles and will cease processing or take other reasonable and appropriate steps to remediate.

## **Access**

If you wish to access, amend or confirm that IICL has personal information about you or you wish to correct such personal information that is inaccurate please contact us.

## **U.S.-E.U. DATA Privacy Compliance Framework**

IICL is committed to the Data Privacy Framework and principles and participates in and we self-certify our compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the United States Department of Commerce regarding processing and retention of Personal Information transferred from the European Union and the U.K. to the United States.

IICL complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce (collectively referred to herein as the “DPF”). IICL has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

IICL is responsible as data controller of Personal Information it collects and receives directly or from a service provider, under the DPF as well as subsequent transfers to a third-party processor acting on our behalf. IICL complies with the DPF for all onward transfers of personal data from the EU and UK, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the DPF, IICL is subject to the regulatory enforcement powers of the United States Federal Trade Commission. In certain situations, we may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the DPF IICL commits to resolve complaints about your privacy and our collection or use of your personal information. You may direct any inquiries or complaints concerning our compliance to our Director of Administration who can be reached at [info@iicl.org](mailto:info@iicl.org).

IICL will respond within 45 days. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily please contact our U.S.-based third-party dispute resolution provider, JAMS, free of charge at <https://www.jamsadr.com/DPF-Dispute-Resolution>.

[Under certain conditions, more fully described on the DPF website <https://www.dataprivacyframework.gov/>), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## Contact Us

If you have any questions or comments about this privacy statement, please contact us at [info@iicl.org](mailto:info@iicl.org).