

Institute of International Container Lessors, Ltd. (“IICL”) Privacy Policy

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IICL (“we” or “us”) 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. 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.

We respect the privacy of customers, prospective applicants for certification, and others who use our website, products and services. 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.

Please read this privacy policy carefully to understand how the IICL processes your personal information. By interacting with our website at www.iicl.org (“Website”) and the services we provide on our Website, you acknowledge our policies and practices described in this document.

Updates to this Policy

We may update this privacy policy from time to time. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the “last updated” date and posting the updated document on the Website.

Children’s Data

Our Website and services are not intended for, and we do not knowingly collect any personal information from, children under the age of 18. If we learn we have collected or received personal information from a child under 18 years old without verification of parental consent, we will delete that information.

Scope

This privacy policy applies to the personal information you provide us and that we receive from our service providers and business partners. Personal information refers to data that identifies an individual such as their name, email address, telephone number, physical address or payment information. The personal information that we collect depends on the context of your interactions with us. You may provide us with your personal information when you choose to become certified, when you choose to contact us, or when you subscribe to receive IICL updates.

In general, you may visit our Website without providing any personal information. However, in order to register for or take a certification test, or a class, we require you to provide certain personal information. This information may include your name, email address, phone number, company name, career information (such as job title and experience), digital signature, physical address, fax number.

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. We only use your ID and your palm vein scan to verify a test taker's identity and such information is not used for any other purpose.

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.

Marketing Messages

You may sign up to receive email marketing messages from us. You may opt out at any time by clicking the 'unsubscribe' button in the emails you receive. Please note that even if you opt out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative emails (for example, in connection with a details update request) that are necessary to facilitate your use of the website.

Information We Automatically Collect

When you use our Website, we may automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Website, we may collect information about the individual web pages or products that you view, what websites or search terms referred you to the website, and information about how you interact with the website. We refer to this automatically collected information as "Device Information".

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Log files" track actions occurring on the website, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons", "tags", and "pixels" are electronic files used to record information about how you browse the website.

We use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on our Website can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Website to work properly. They include any essential authentication and authorization Cookies for our Website.
- **Functional:** These Cookies enable technical performance and allow us to remember the choices you make while browsing our Website, including any preferences you set. They also include sign-in and authentication Cookies and IDs that enable you to return without additional sign-in.

- Performance/Analytics: These Cookies allow us to collect certain information about how you navigate the Website and Services running on your device. They help us understand which areas you use and what we can do to improve them.
- Targeting: These Cookies are used to deliver relevant information related to our Website to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit our Website. Some of these types of Cookies on our Website are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to our Website.

We use the Device Information that we collect to help us to improve and optimize our website (for example, by generating analytics about how individuals browse and interact with the website, and to assess the success of our marketing and advertising campaigns).

Cookies can be controlled, blocked, or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browser specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your Cookie preferences across these environments.

Find out how to manage Cookies on popular browsers:

- Google Chrome, available at <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Microsoft Edge, available at <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- Mozilla Firefox, available at <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Microsoft Internet Explorer, available at <https://support.microsoft.com/en-gb/windows/manage-cookies-in-microsoft-edge-view-allow-block-delete-and-use-168dab11-0753-043d-7c16-ed5947fc64d>
- Opera, available at <https://www.opera.com/help/tutorials/security/privacy/>
- Apple Safari, available at <https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

Disclosure of Personal Information

Please note that testing facilities (Pearson Professional Centers) are wholly owned and operated by Pearson.

We use your personal information for the following purposes and as otherwise described in this privacy policy or at the time of collection:

- To process your requests, such as a request to sign up for a certification;
- To verify your identity;
- To maintain your account, once you have registered for one;
- To process your payment transactions;
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs);

- To send periodic emails - The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving occasional company news, updates, related product or service information;
- To enforce our terms, conditions, and policies;
- To improve our Website and our services;
- To comply with legal requirements; and
- For any other purpose with your consent.

We may share your personal information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights. We reserve the right at all times to disclose any information as necessary to satisfy any law, regulation or governmental request, to avoid liability, or to protect our rights or property. We may disclose your personal information as part of a corporate business transaction such as a merger or acquisition, divestiture, sale of company assets, or in the event of insolvency, bankruptcy, or receivership. In these cases, personal information could be transferred to third-parties as business asset.

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 Website or that of our service provider an email sent to us or our service provider may not be secure.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note the information you share in public areas may be viewed by any user of the website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

Data Retention and Purpose Limitation

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

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 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.

We have contractual obligations/understandings with our vendors so your personal information 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 outside of those regions unless such third parties have entered into an agreement in writing with us requiring them to protect your personal information.

Third Party Links

At our discretion, we may include or offer third party products or services on the Website. These third party products and services have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

Your Account Choices

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. You may direct any inquiries or complaints concerning your personal information to our Director of Administration who can be reached at info@iicl.org.

Contact Us

If you have any questions or comments about this privacy statement, please contact us at info@iicl.org.