

Privacy Policy

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1. About this Policy

1.1 Definitions:

IAM	means International Association of Memory, a registered association (UG).
GDPR	means the General Data Protection Regulation.

1.2 This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.

1.3 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.4 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our [website](#) or our newsletter regularly for any

amendments (but amendments will not be made retrospectively).

1.5 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the [website](#) from the European Commission.

For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are the International Association of Memory (IAM). We can be contacted at info@iam-memory.org or via post:

International Association of Memory UG (haftungsbeschränkt)
Claude-Lorrain-Straße 31
81543 Munich
Germany

3. Data protection principles

The IAM is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. 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."

4. What information we collect and why.

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Type of information	Purposes	Legal basis of processing
Member's name, email address(es), Country of residence, Nationality	Managing the Member's membership of the IAM and determining regional membership, voting and election eligibility.	Performing the IAM's contract with the Member. For the purposes of our legitimate interests in operating the IAM.
Date of birth / age related information	Managing membership categories which are age related (including voting and election eligibility)	For the purposes of our legitimate interests in operating the IAM.
Gender	Provision of adequate facilities for members. Reporting information to the IAM. Managing competition entries and competition results.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of our legitimate interests in operating the IAM. For the purposes of our legitimate interests in holding competitions for the benefit of members of the IAM.
Name, Birthdate and Email from legal guardian (if the applicant is younger than 15), as well as their relation to the person applying	Confirmation that legal guardian consents to the membership. Email will only be used if the IAM deems that there is something that the legal guardian needs to be aware of (confirmation email after registration for example).	People under the age of 15 need consent from their legal guardian in order to become members. For unforeseen situations, we also need to be able to contact the legal guardian.
The Member's name, ranking, competitor's	Managing competition entries and competition results.	Performing the IAM's contract with the Member. For the purposes of our legitimate

number and competition or arbitration status	Sharing competition results with other associations and the IAM, and providing competition results to local and national media. Determining membership and/or election eligibility.	interests in holding competitions for the benefit of members of the IAM. For the purposes of our legitimate interests in promoting the IAM. For the purposes of our legitimate interests in operating the IAM
Photos and videos of Members	Putting on the IAM's website and social media pages and using in press releases.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.

The Member's name, newsletter subscription and email address	Creating and managing the IAM's online Membership Directory. Creating and managing the IAM's newsletter directory.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory or cancel their newsletter subscription.
The Member's name and email address, whilst a current member and for up to a year after ceasing to be a member of the IAM	Conducting surveys of Members and former members of the IAM.	For the purposes of our legitimate interests in operating the IAM.

Website activity collected through cookies	Website functionality	Legitimate interests in operating the IAM - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your browsing before you have exited the website.
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5. How we protect your personal data

- 5.1** We will not transfer your personal data outside the EU without your consent.
- 5.2** We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 5.3** Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 5.4** We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

6. Who else has access to the information you provide us?

- 6.1** We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 6.2 and 6.3 below.
- 6.2** We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the IAM and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub- processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

7. How long do we keep your information?

7.1 We will hold your personal data on our systems for as long as you are a member of the IAM and for as long afterwards as it is in the IAM's legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

8. Your rights explained

8.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Data Protection Manager info@iam-memory.org.

- a. **The right to be informed (knowing how we will use your data).**
You have the right to be told how we will use your Personal Data – which is set out in this notice.
- b. **The right of access (being provided with copies of your data).**
You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.
- c. **The right to rectification (changing incorrect information we hold).**
If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.
- d. **The right to be forgotten (erasure) (requesting deletion of your Personal Data).**
In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).
- e. **The right to restrict processing (limiting how we use your data).**
In certain situations you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- f. **The right to data portability (moving your data in a useable format).**
You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit

that data to a third party - in certain situations.

g. **The right to object (when we must stop processing your data).**

You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.

h. **The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human involvement).**

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. The IAM does not undertake automated decision making or profiling.

8.2 You have the right to take any complaints about how we process your personal data to your local protection authority.:

In particular, the IAM is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy. If, however, you believe that the IAM has not been able to assist with your complaint or concern, you have the right to make a complaint with the competent EU Member State authority.

8.3 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the EU Commission on individuals' rights under the [General Data Protection Regulation](#).

9. Visiting the web pages

When the web pages of the International Association of Memory (IAM) are accessed, the browser used on the terminal device automatically sends information to the website server. This information is temporarily stored in a log file. The following information is recorded and stored until it is automatically deleted:

- IP address of the requesting computer;
- Date and time of access;
- Coordinated Universal Time (UTC) or Central European Time (CET) and time zone difference relative to Greenwich Mean Time (GMT);
- Name and URL of the retrieved file (specific page);
- Access status/HTTP status code;
- Amount of data transmitted in each case;

- Website from which access originates (referrer URL);
- Browser used and, where applicable, the operating system of the computer and the name of the access provider;
- Language and version of the browser software.

The data processing takes place in order to enable a smooth set-up of the connection with the website, the use of the website, evaluation of the system security and stability as well as for administrative purposes. Also for reasons of technical security, especially to prevent attempts to attack the web server, this data is stored.

Data recorded during access to the website will only be transmitted to third parties if IAM is legally or by court order obliged to do so, or if disclosure is necessary for legal or criminal prosecution in the event of attacks on the internet infrastructure. They are not passed on for other non-commercial or commercial purposes. The data are processed exclusively for this purpose and, in anonymous form, for statistical purposes.

10. Cookies

When accessing these web pages, cookies (small files) are stored on the terminal device, which are valid for the duration of the visit to the internet site. Most browsers are set to accept the use of cookies, though these functions can be disabled for the current session or permanently by setting the internet browser accordingly. When closing the browser, these session cookies are automatically deleted. Complete deactivation of cookies can, however, mean that not all functions of the website can be used. Where cookies are used to collect personal data, we list these purposes in section 4 above, along with other personal data that we collect.

11. Active components

Javascript is used in the information provided by IAM. This function can be switched off by setting the internet browser accordingly.

12. Consent

By using the website, becoming a member or making contact, the user consents to the data processing described in this privacy policy.

Protection for minors: Persons under the age of 16 should not transmit any personal data without the consent of their parents or legal guardians.