Data Protection Notice
CSA Research Working Groups, Expert Groups, and Focus Groups

27th August 2021

This Data Protection Notice has been written in order to explain the Cloud Security Alliance’s policy regarding your privacy, as well as how we will handle your personal information in the context of your participation to any CSA Research Working Group, Expert Group, or Focus Group (hereinafter also referred to as “Volunteer Groups”).

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Who is responsible for my personal information?

We, the Cloud Security Alliance, with registered offices at 709 Dupont St, Bellingham, WA 98226 USA (herein after “CSA”, “we”, “us”) are the data controller regarding all personal data processing carried out in the context of your participation to online meetings, teleconferences, events, and conferences organized by CSA Volunteer Groups.

To get in touch with our Data Protection Officer, please contact: dpo@cloudsecurityalliance.org.

What personal information does CSA collect?

When participating in an online meeting, teleconference, conference or event held by CSA Volunteer Groups, we will collect and process information related to you (as an individual), which allows you to be identified either by itself, or together with other information we have access to.

We may also be able to collect and process information regarding other persons in this same manner, if you choose to provide it to us.

This information may be classified as “Personal Data”.

Personal Data that may be processed by CSA in the context of your participation to activities or events organized by a CSA Volunteer Group are as follows:

(a) Participant Data

When you sign-up to participate in CSA Volunteer Groups, you will be asked to complete a form where you are to include information about yourself, such as:

- first and last name*
- e-mail address*
- country of residence*
- fixed / mobile phone number
- address (including city, state and zip / postal code)
- the organization you work for
- job title
- your background in cloud security
- the ways you would like to contribute to the PLA WG
- how many hours you would like to participate
- any ideas or suggestions for leadership provided

Note: Fields marked with * are mandatory; the rest are optional.

If you request to participate to certain CSA Volunteer Groups, (e.g., the CSA Expert Group), we will also require you to provide a copy of your CV and/or LinkedIn profile. This may entail the provision of additional data about you with respect to what is listed above under letter (a), e.g., a personal photo or other information that you freely choose to disclose on your CV.

Once you become a member of a CSA Volunteer Group, we will also process Personal Data related to your attendance and any contributions you make to the Volunteer Group or to the CSA events you participate in.
(b) **Photographs and videos**

In the case of events or conferences, we may also collect and use photographs and footage of participants (via a live stream). Presentations given by speakers during the meeting or event may also be collected and used, subject to their consent (see below for more information).

(c) **Participant-submitted content**

CSA Volunteer Groups rely, for project management purposes, on Basecamp. Basecamp allows you to engage other Volunteer Group participants in discussion, to upload comments and documents and to revise documents uploaded by others, among other functionalities.

You may decide to include Personal Data within the content you upload onto Basecamp. In this case, you should bear the following in mind:

- CSA will only process such Personal Data to the extent that it has a legal basis to do so – see, in particular, section (d) below (“Special categories of Personal Data”);
- You may be held responsible for uploading the Personal Data of others – see, in particular, section (e) below (“Other persons’ Personal Data”);
- Basecamp, which generally acts as a data processor on CSA’s behalf, may also process such Personal Data for its own purposes – see Basecamp’s Privacy Policy for more information on this.

(d) **Special categories of Personal Data**

In the context of your participation to CSA Volunteer Groups, CSA will not collect or process special categories of Personal Data, such as information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data related to you or data concerning your health, sex life or sexual orientation.

The form you completed to sign-up to any CSA Volunteer Group includes free text fields, which you might use to provide us with some additional information or details related to you. Basecamp can also be used for these purposes. We kindly request that you do not disclose any such special categories of Personal Data in those fields.

Special categories of personal data may also be included in the CV that CSA requires you to provide to participate to certain CSA Groups, (e.g., the CSA Expert Group). In this case, we would kindly request that you redact this information from your CV before providing it to CSA. In any case, CSA will not further process any special categories of Personal Data included in your CV, as such processing is not necessary for the purpose of your participation to the CSA Volunteer Groups.

CSA will only process any special categories of Personal Data you submit where your explicit consent is given, or where another legal basis for processing can be relied on, and in any case only where deemed adequate, relevant and necessary in the context of the processing purposes provided in this Data Protection Notice.

(e) **Other persons’ Personal Data**

As mentioned in previous sections, certain areas of CSA sign-up forms may include free text fields where you can write messages to CSA. Basecamp also allows you to
submit content almost freely. These messages/content may (inadvertently or not) include Personal Data related to other persons.

In any situation where you decide to share Personal Data related to other persons, you will be considered as an independent data controller regarding that Personal Data – meaning you will be held responsible for that decision. In turn, this means, among other things, that you may be held liable for any complaints, claims or demands for compensation which are brought against CSA, due to the fact that you decided to share Personal data related to other persons with CSA.

As such, you must make sure that you are legally entitled to provide us with this information (e.g., because you have the data subjects’ consent, because a legal obligation to inform CSA exists, because this information is provided in the performance of a task in the public interest, etc.).

Why is CSA using my Personal Data?

We intend to use your Personal Data for the following purposes:

(a) **CSA Volunteer Group Management**

To organize and coordinate the activities related to CSA Volunteer Groups; in particular, to allow you to take part in Volunteer Group initiatives (such as meetings, held over conference calls) and to share participant lists and personal contributions with other members of Volunteer Groups;

- It is mandatory to provide us with your Personal Data for these purposes, where you wish to participate in a CSA Volunteer Group. Where you fail to do so, you may be prevented from participating in the Volunteer Group.

(b) **Event Management**

To organize and coordinate events held by CSA and related to the Volunteer Groups’ activities, in particular to allow you to take part in these events and to compile and share participant lists with event attendees;

- It is mandatory to provide us with your Personal Data for these purposes, where you wish to participate in a CSA-hosted event. Where you fail to do so, you may be prevented from participating in events hosted by CSA.

(c) **Photos / Presentations / Web-Streaming**

To take and publish photographs taken at events on CSA’s website and communication / promotional materials for events, which may include event participants, to publish and make available presentations given by speakers and to broadcast events via live web-streaming, which may include footage of participants;

- It is not mandatory to provide your Personal Data to us for these purposes, and you will suffer no consequence where you choose not to (i.e., you will not be prevented from participating in or speaking at an event).

(d) **Marketing**

For future marketing, promotional and publicity purposes, including via e-mail or the phone, regarding CSA’s products and services, as well as those of selected third parties (sponsors and CSA corporate members) ("Marketing");
• It is not mandatory to provide us with your Personal Data for these purposes, and you will suffer no consequence where you choose not to (i.e., you will not be prevented from participating in or speaking at an event).

(e) **Compliance**

To comply with data protection or other applicable laws which impose upon CSA the collection and/or further processing of certain kinds of Personal Data.

• When you provide any Personal Data to us, we must process it in accordance with the applicable law, which may include retaining and reporting your Personal Data to official authorities for compliance with legal obligations.

All Personal Data we process may be included in periodic backups carried out to ensure the availability of information stored on our IT systems and may be processed to ensure compliance with our legal obligations regarding the processing of Personal Data (e.g., related to management of personal data breaches), as well as, in general, to protect our interests related to potential liability related to this processing.

**Why is CSA entitled to use my Personal Data?**

The legal bases which CSA relies on to process your Personal Data, according to the purposes identified above, are as follows:

**(a) CSA Volunteer Group Management**

Processing for this purpose is necessary to provide the services requested (e.g., to allow you to participate in CSA Volunteer Groups) and, therefore, is necessary for the performance of a contract with you.

**(b) Event Management**

Processing for this purpose is necessary to provide the services requested (e.g., to allow you to participate in an event) and, therefore, is necessary for the performance of a contract with you.

**(c) Photos / Presentations / Web-streaming**

Processing for this purpose is based on your consent. Any consent given may also be withdrawn at a later stage (see [below](#) for more information).

**(d) Marketing**

Processing for these purposes is based on your consent. It is not mandatory for you to give us your consent for the use of your Personal Data for these purposes, and you will suffer no consequence if you choose not to give it (aside from not being able to receive further marketing communications from us). Any consent given may also be withdrawn at a later stage (please see [below](#) for more information).

**(e) Compliance**

Processing for this purpose is necessary for CSA to comply with its legal obligations.
Who can have access to my Personal Data?

Your Personal Data may be shared with the following list of persons / entities ("Recipients"):

- **Basecamp**;
- **Sponsors and selected CSA Corporate Members**, where you provide consent for your Personal Data to be used for third-party marketing purposes;
- Other participants who sign-up for CSA Volunteer Groups and CSA events;
- Persons, companies or professional firms providing CSA with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to CSA Volunteer Group activities and related CSA events;
- Entities engaged in order to organize CSA Volunteer Group activities and related CSA events (e.g., hosting providers or e-mail platform providers, event organizers);
- Persons authorized by CSA to perform technical maintenance (including maintenance of network equipment and electronic communications networks);
- Persons authorized by CSA to process Personal Data needed to carry out activities strictly related to CSA Volunteer Group management, who have undertaken an obligation of confidentiality or who are subject to an appropriate legal obligation of confidentiality (e.g., employees or contractors working for CSA);
- Other entities within CSA for internal administrative purposes, including the processing of your Personal Data in relation to any inquiries made;
- Public entities, bodies or authorities to whom your Personal Data may be disclosed in accordance with applicable law or binding orders of such entities, bodies or authorities.

Will my Personal Data be transferred abroad?

Considering our worldwide presence and global business operations, your Personal Data may be transferred to Recipients located in several different countries, including to Recipients located in the United States of America. We implement appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, such as by relying on adequacy decisions from the European Commission, Standard Contractual Clauses adopted by the European Commission, and/or other safeguards or conditions considered adequate to the relevant transfer.

More information on these transfers is available upon written request to CSA at the following address: dpo@cloudsecurityalliance.org.

How long is my Personal Data kept?
(a) **CSA Volunteer Group Management**

We will keep your Personal Data processed for **CSA Volunteer Group Management** for the period deemed strictly necessary to fulfil the provision of services. In any case, as we process this Personal Data to provide services to you, we may continue to store this Personal Data for a longer period, as it may be necessary to protect our interests related to potential liability regarding the services provided.

(b) **Event Management**

We will keep your Personal Data processed for **Event Management** for the period deemed strictly necessary to fulfil the provision of services. In any case, as we process this Personal Data to provide services to you, we may continue to store this Personal Data for a longer period, as it may be necessary to protect our interests related to potential liability regarding the services provided.

(c) **Photos / Presentations / Web-streaming**

We will keep your Personal Data processed for **Photos / Presentations / Web-streaming** until you withdraw your consent. Once consent is withdrawn, Personal Data will no longer be used for these purposes, although we may still keep it, in particular as may be necessary to protect our interests related to potential liability related to this processing.

Please bear in mind that the withdrawal of your consent will not affect the lawfulness of processing of your Personal Data carried out beforehand.

(d) **Marketing**

We will keep your Personal Data processed for **Marketing** from the moment you give consent (if any) until it is withdrawn. When you withdraw your consent, your Personal Data will no longer be used for these purposes, although we may still keep it, as it may be necessary to protect our interests related to potential liability related to this processing.

Please bear in mind that the withdrawal of your consent will not affect the lawfulness of processing of your Personal Data carried out beforehand.

(e) **Compliance**

We will keep your Personal Data processed for **Compliance** for the period required by the specific legal obligation or by the applicable European Union or Member State law.

**General comment**: Please note that, in any case, we may continue to store your Personal Data for a longer period, as may be necessary for internal auditing and security purposes (including within periodic backups) and, in general, to protect our interests related to potential liability related to this processing.

**What are my rights? How can I exercise them?**

As a data subject, you are entitled, in general, to exercise the following rights before CSA, with respect to your Personal Data being processed by us:
• Access your Personal Data (and/or a copy of those Personal Data), as well as information on the processing of your Personal Data;
• Correct or update your Personal Data, where it may be inaccurate or incomplete;
• Request the erasure of your Personal Data, where you feel that the processing is unnecessary or otherwise unlawful;
• Request the blocking of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
• Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent us from processing your Personal Data for a given purpose;
• Withdraw your consent to the processing of your Personal Data (for Photos / Presentations / Web-streaming / Marketing);
• Exercise your right to portability: the right to obtain a copy of your Personal Data provided to CSA, in a structured, commonly-used and machine-readable format, as well as the transmission of that Personal Data to another data controller.

Please note that some of your Personal Data provided to us can be changed at any time, including your e-mail preferences, by accessing your personal account on Basecamp, where applicable.

You can also withdraw consent for Marketing (for communications received via e-mail) by selecting the appropriate link included at the bottom of every marketing e-mail message you receive.

Aside from the above-mentioned means, you can always exercise your data subject rights described above by sending a written request to us at the following address: dpo@cloudsecurityalliance.org.

Please note that the above rights may not apply, or may not apply in full, as there may be applicable legal exemptions or restrictions to those rights. We will assess this on a case-by-case basis. If such an exemption or restriction is found to be applicable, you will be informed of our reasoning for this.

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that we process your Personal Data unlawfully. You will suffer no prejudice on account of any such complaints lodged.