AFGC Privacy Policy and GDPR Compliance

Terminology/Date Utilization
AFGC has one processor systems which contain and utilize the personal contact information of AFGC members, event participants, colleagues doing business with AFGC, and prospects for any of these groups. The system is called Internet 4 Associations (i4a), is the AFGC membership database, which is a cloud-based software; this also allows the affiliate leaders the ability to access and communicate with their members. Additionally, AFGC on rare occasions uses a technology provider called Survey Monkey to ask for basic contact information within online surveys for the purpose of data consent forms or for identification of survey respondents for prize giveaways, within evaluation surveys on AFGC events and services (however most survey responses are collected anonymously and can be kept anonymous at the respondent’s discretion). Each processor has provided their privacy policy and GDPR compliance documentation to AFGC to ensure the full protection of privacy, and voluntary opt-in/opt-out processes, for their member and event participant data. The AFGC staff has access to these applications via a secure and unique login for each AFGC staff member. These services are browser-based applications, accessible via the internet. The general public who would like to consume event data presented by AFGC via these tools can access the data via their own secure login, in the case of i4a.

The list of stored data fields includes, but are not limited to: name, email, title, employer, address, phone number, business role, crop focus area, years in the seed industry, event supplier categories that most interest them, AFGC strategic issues that most interest them, event participation history, and user ID. **AFGC does not collect not store sensitive information, such as social security number, date of birth, driver’s license number, race/ethnicity, religious or philosophical beliefs, health/medical information, political beliefs, sexual orientation, genetic data, biometric data, nor trade union membership for any individual.**

AFGC Position
GDPR Chapter II states 7 major principles of the requirement. AFGC’s response to these principles are as follows:

**Principle 1: Lawfulness, Fairness, and Transparency**
According to GDPR, AFGC is a data controller. As such, AFGC provides required and transparent “opt-in” language and check boxes requiring manual action on the forms an individual completes when applying to become a registered attendee, exhibitor or speaker; or for the general public who would like to log in to access the AFGC website’s members-only information. If at any time the individual would like a report on how or when their data was accessed, that can be provided by AFGC. If an individual request to be deleted from the data set, that individual can request AFGC take anonymization procedures, or be removed entirely. AFGC has a standard practice for anonymization of user data by request and specifically related to GDPR, so that historical data on event participation and years of membership can still be maintained.

**Principle 2: Purpose Limitation**
AFGC collects data only to improve the member or event participant experience in near and long-term future and to serve and support its membership, registration and marketing operations. AFGC has no reason to believe that anyone would object to any of its data practices.

**Principle 3: Data Minimization**
The data that AFGC members, exhibitors, speakers, event participants and members of the general public who have voluntary interactions with AFGC will only be available to the AFGC staff and visitors to their websites in accordance with the purpose limitations decided on in Principle 2.
**Principle 4: Accuracy**
AFGC staff have complete control over the accuracy of the data. When the user edits their information on the ASTA processor online forms, they have complete control over the accuracy of their data. If inaccuracies are found, in many cases, the user can update this information themselves. If, for any reason, they are unable to do so, AFGC will be able to access their record and make the edits.

**Principle 5: Storage Limitation**
For historical purposes and comparison of year over year participation in AFGC membership and events, AFGC can store personal data as long as an individual would like to keep it. Keeping several years’ data is important for business comparisons. Printable registration forms containing credit card information for conference registrants are destroyed within one month of the close of the event. Event websites will only be available to the public for approximately one month after the event.

**Principle 6: Integrity and Confidentiality**
AFGC’s data processors are secured and accessed with TLS 1.2 and all financial transactions are PCI Compliant. AFGC also limits availability of event registration data to other registrants, behind a secure login. These measures were already enhanced in 2018 with individual privacy in mind, as GDPR now requires. AFGC does not sell or provide unauthorized access to any data that it has.

The nature of the association and events business doesn’t naturally lend itself to anonymity. Attendees and exhibitors are participating because they want to be seen, and speakers are participating because they want to be heard. With security in mind, AFGC only exposes the data that is pertinent to member and participant business concerns, to foster education and networking.

**Principle 7: Accountability**
According to Article 37 of the act, AFGC does not feel that our processing operations are large enough to require a Data Protection Officer. In accordance with Article 35, AFGC will notify clients of any data breach without undue delay.

**Minor Data Policy**
AFGC does not collect nor store information on minors as a general rule. In the case of a conference registration, a minor will have only their first and last name stored in the AFGC registration data history, as minors are registered only as sub-registrants of a primary delegate registration. Only the primary delegate registration includes the full contact information for said delegate. Likewise, spouse registrations for AFGC events are also sub-records under the primary delegate’s registration record.

**Breach Notification**
AFGC will notify individuals affected by any known data breach within 72 hours of its awareness of such a breach.

**Removal of Data/Opt-Out Process**
Any individual who wishes to have their data deleted may email your request to membership@afgc.org to request your profile to be forgotten. All personally identifiable information (PII) data will be removed from your profile in 30 business days following the request.

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If you have questions about this document, please contact us at 800-944-2342.