

## INQUIRE Europe Data processing and retention procedures approved by the Inquire Europe Board on 25 March 2019

This document sets out:

- a) Data held by INQUIRE Europe – summary of the 2019 data mapping exercise
- b) INQUIRE Europe data retention policy
- c) INQUIRE Europe data retention procedures
- d) INQUIRE Europe Privacy policy

### **A. Data held by INQUIRE Europe – summary of the 2019 data mapping exercise**

1. **Current members contacts** – these are contacts at current member organisation, those provided in the membership process, those involved in the administration (invoicing) and those who have attended or been invited to attend events.
2. **Supporter contacts** - these are people that INQUIRE Europe mails to invite to events such as prospects and key contacts from past members.
3. **Partner contacts** - INQUIRE Europe keeps the names of event attendees from organisations who are members of Inquire Europe, Inquire UK, CQA (and any organisations that have partner arrangements) in order to monitor partner places at events.
4. **Research contacts** – INQUIRE Europe holds contact details for research grant recipients and research grant applicants
5. **Speaker and academic contacts** – these include people who have responded to INQUIRE's calls for papers or spoken at one of INQUIRE's seminars.
6. **Supplier contacts** – INQUIRE Europe holds contact details relating to INQUIRE Europe's suppliers.

### **B. INQUIRE Europe data retention policy**

1. **Current members;** contact details of individuals working for current members is retained in INQUIRE Europe's database unless there is a request to delete it. Whilst contact data (email address) is retained other information provided when booking events (e.g. dietary requirements, arrival timing) is not retained.
2. **Key contacts from past members and prospects;** these are retained INQUIRE Europe's database for 5 years as Supporter contacts; (Appointed Representatives and those who have attended seminars). If the organisation has not joined / re-joined INQUIRE Europe after 5 years the contacts are deleted.
3. **Other contacts from past members;** these are deleted from INQUIRE Europe's database when their organisation ceases to be a member of INQUIRE Europe, unless INQUIRE Europe needs to retain information for regulatory or legal reasons.
4. **Partner contacts;** these are contacts who are Inquire Europe, Inquire UK or CQA members. The name and organisation of event attendees from organisations who are members of Inquire Europe, Inquire UK, CQA (and any organisations that have partner arrangements) are retained in order to monitor partner places at events. These records are deleted after five years.

5. **Research funding recipients;** these contacts are deleted upon request after the completion of the project.
6. **Unsuccessful research applicants;** these contacts are deleted one year after the conclusion of the funding round.
7. **Speaker and academic contacts;** these are contacts who respond to INQUIRE Europe's calls for paper or who speak at one of INQUIRE Europe's seminars. These contacts are deleted upon request.
8. **Supplier Contacts;** supplier contacts are retained for five years after the completion of the contract (or longer if required for regulatory purposes). Contacts not required for any regulatory purpose will be deleted earlier on request.
9. **Research papers, academic papers, seminar papers;** all material is retained in perpetuity, unless Inquire Europe is asked to remove them from the website. Output of funded projects is in principle retained in perpetuity

### **C. INQUIRE Europe data retention procedures**

#### **Following each Seminar:**

1. Data review following each event
  - 1.1. Any new prospect / member contacts attending events are added into INQUIRE Europe's database (permission having been requested in the event registration)
  - 1.2. Partner contact names / organisation are added to monitor partner places at events

#### **Annual data review**

2. **Annual review of INQUIRE Europe's databases**
  - 2.1. contacts from past members who left Inquire Europe 5 years ago are removed from the database.
  - 2.2. contacts from members who left Inquire Europe last year are reviewed and only the key contacts (appointed representative and those who have attended Inquire Europe events) are retained, other contacts are removed from Inquire Europe database.
  - 2.3. contacts from prospect organisations are reviewed and contacts from these organisations are removed from the database after five years (if they have not attended a seminar or have no interest to join as a member).
3. **Mailing list removal requests**
  - 3.1. confirm that anyone who has requested to be removed from INQUIRE Europe's mailing list has had their contact email and personal detail removed from Inquire Europe database, and also details removed from the website (unless there is a legal or other reason in line with INQUIRE Europe's privacy policy for not removing them). The names (and only the names) of those requesting to be deleted is retained in Inquire Europe database on a suppression list, so that the list can be checked if suggestions are made to invite new individuals to an event.
4. **Annual review of grant recipients / applicants**
  - 4.1. data regarding unsuccessful grant applicants in the previous calendar year is deleted from any mailing lists and databases.
  - 4.2. data regarding grant recipients whose projects finish is deleted upon request. A note will be added in the correspondence on the final research donation/grant.

NOTE: research and seminar papers are retained in perpetuity, unless Inquire Europe is asked to remove them from the website.

## **5. Annual review of Academic contacts**

5.1. Those who responded to Calls for Papers and have not been accepted are deleted from mailing lists and databases, five years after the relevant seminar or application unless they have asked to remain on our mailing list.

## **6. Financial records**

6.1. supplier details from any mailings lists contacts from suppliers who have not provided services for five years are deleted from any mailing lists and databases.

## **7. Annual review of privacy policy**

7.1. the Inquire Europe privacy Policy is to be reviewed by the Board and if necessary, changes are communicated to contacts

7.2. the Inquire Europe data retention policies and procedures are to be reviewed, approved by Board and changes implemented.

7.3. the review is part of and signed off at the Annual Summer Board Meeting.

## **D. INQUIRE Europe Privacy policy**

The Institute for Quantitative Investment Research ("Inquire Europe ") is committed to protecting and respecting your privacy.

We are a not-for-profit organisation which exists to encourage interaction between academia and the investment management industry, and we are funded by member companies. We hold seminars twice a year and have arrangements with other similar organisations in different areas of the world for our members to attend their events and their members to attend our events. We also support and donate financial research projects.

We consider a firm a supporter if it has been a member of our organisation within the last five years or is a prospective member of our organisation.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Inquire Europe only processes information necessary to organise events and research initiatives and to establish or maintain membership or support.

We require limited personal data to organise our events in order that we can contact you efficiently and provide you with information needed to attend our events. We also need information such as dietary requirements if you have specific requirements so we can endeavour to meet those requirements.

To maintain, expand and develop our activities we need to record the personal data of individuals at member and supporter firms who manage the firm's membership, administration or invoicing, who wish or may wish to attend our events or who provide us with services.

To carry out our activities we also need to record personal information of individuals applying for research funding, individuals at organisations supplying us with services and individuals at organisations we partner with including Inquire UK and CQA.

To carry our activities, we also need to retain research papers, academic papers and seminar papers. Inquire Europe only processes information necessary to administer membership and research projects and to provide or administer activities for firms who are members or supporters of the organisation or have regular contact with it.



Inquire Europe only shares this information with people and organisations necessary to carry out our activities, including managing membership, research projects, Inquire Europe's website, organisations we organise events with or partner with and organisations involved in assisting Inquire Europe in organising events on your behalf or providing you with accommodation.

Inquire Europe only keeps this information whilst your firm remains a member or supporter, unless Inquire Europe has a regulatory or legal requirement to keep the information.

Inquire Europe keeps the personal information of individuals who receive research funding after the completion of the project, unless you ask us to delete the information on file.

Inquire Europe only keeps the personal information of individuals who apply unsuccessfully for research funding for 1 year, unless you ask us to keep your information on file.

Inquire Europe keeps the personal information of individuals who speak at seminars or who respond to INQUIRE Europe's call for papers, unless you ask us to delete the information on file.

Inquire Europe provides our members with access, via the website, to academic papers, research papers and seminar papers submitted to us in perpetuity, unless you ask us remove your paper.

We will delete your information on request, provided we are not required to retain it for regulatory or legal reasons us.

With regard to each of your visits to our website at [www.inquire-europe.org](http://www.inquire-europe.org) we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page

Any changes to this policy will be posted on our website at [www.inquire-europe.org](http://www.inquire-europe.org)

Please contact us with any enquiries regarding our privacy policy, or to request data we hold on you, at [info@inquire-europe.org](mailto:info@inquire-europe.org)