



# Sibos Privacy Statement

## Introduction

This Privacy Statement explains how your personal data is processed by S.W.I.F.T. SCRL (“SWIFT”, “we”, “us” or “our”), when you register and participate in the Sibos 2019 event (“Event”), and use our services and tools in this context. Capitalized terms used in this Privacy Statement but not defined herein have the meaning given to these terms in the [Sibos Registration Policy](#).

“Personal data” means any information relating to an identified or identifiable individual.

We process your personal data in several ways when you attend the Event. We process data collected via your online registration and when you use our app (“Sibos App”). We also process your personal data collected via the attendance badge you are provided to wear at the Sibos 2019 event (“Smart Badge”). The localisation feature of the Smart Badge allows SWIFT to analyse participants’ activities and movements at the conference facilities of the Event (“Event Venue”). With your consent, we may perform such analyses to provide you with tailored recommendations for sessions at future SIBOS events.

The Smart Badge also allows participants to share their contact details with each other, request exhibitors to send them marketing information, and identify their peers at receptions via the colour of the light on the Smart Badge. If you do not want a Smart Badge to be paired with your account, you may opt-out at the registration desk or via email to [registration@sibos.com](mailto:registration@sibos.com).

## 1. Sibos Tools

Subject to the [Sibos Registration Policy](#), you will receive access to the Sibos Tools which include (i) the Sibos Smart Badge, (ii) the Sibos 2019 participants list, (iii) Sibos.com including the restricted pages for delegates, the Sibos Exhibitor portal, Sibos registration and the Conference Content Management (CCM), (iv) the Sibos Mobile Application (Sibos App) and (v) Sibos Instant Messenger.

The Sibos Tools are made available to you for networking, preparation and planning of the Event, and follow-up purposes and allow you in particular to contact and exchange information with other Sibos participants and exhibitors. You may not use the personal data in these tools for other purposes.

The Sibos Tools include by default all of the following information per participant (i.e., the Participant Directory): last name, first name, job title, company, name, photo and the attendance dates. The below section explains in more detail how we may collect your personal data in the context of Sibos.

## **2. What Personal Data We Collect**

We collect personal data when you use the Sibos App, Smart Badge and all other services, tools and features available at the Event (“**Services**”) and from other sources as explained below.

Where applicable, we indicate whether and why you must provide us with your personal data, as well as the consequences of failing to do so. If you do not provide personal data when requested, you may not be able to benefit from all our Services.

This section describes the types of personal data we process and the sources from which we obtain them.

### **2.1. Sibos Registration Information Provided by You**

When you buy tickets to the Event you are directed via email link to perform online registration on our website. When you create an account and register for the Event, we collect your username and password, last name, first name, function, job title, company name, attendance dates, contact details (company email address and company mobile number), photograph, country, accreditation, type of institution, primary business / market focus, primary area of responsibility, function within the institution, interests, motivation for attending Sibos, personal interests at Sibos, age range, company address, and emergency contact person (name and phone number)

We may also receive details about the payment method you use, such as your bank account or credit card information.

Some sections in the registration form will be prefilled if you’ve participated in a Sibos event before. You may confirm or amend this information e.g., your country, institution type, category of function, primary business focus, primary area of responsibility and age range.

All mandatory data needed for your registration are indicated with an asterisk. Failing to provide this information will prevent us from registering you for the Event (in accordance with the [Sibos Registration Policy](#)).

### **2.2. Personal Data Collected via the Sibos App and Sibos.com**

We collect your personal data when you log on the Sibos App and use the functionalities like your favourites (speakers, sessions, exhibitors, delegates), your ratings (sessions), your messages and your personal profile.

If you are logged in on the Sibos App or Sibos.com, some activities done via the Smart Badges (e.g. Share business cards or gamification) can be displayed.

### **2.3. Personal Data collected via the Smart Badge**

The Smart Badge is a badge with a wearable device or tag allowing SWIFT to collect participants' location when they are present in the Event Venue. SWIFT will use such information to analyze participants' activities at the Event. SWIFT may combine this information with the demographic data that participants provide upon registration (see Section 1.1 above) to create statistics to evaluate attendance to sessions, performance of the exhibition floor and the Event in general.

At the Event, you will be able to “click” your Smart Badge with the Smart Badge of another participant to connect and exchange your contact details (based on the information provided upon registration). By doing so, you consent to the exchange of these details including your first name, last name, company address, telephone number(s), photo and email address. These contact details may only be used for one-to-one communications and cannot be processed for direct marketing, lead retrieval or other commercial purposes. For these purposes, the Lead Retrieval services need to be used. The Smart Badge also allows participants to share their contact details with exhibitors whose marketing information they would like to receive.

If you do not want your personal data to be collected via a Smart Badge, you may opt-out of the “smart” feature of your badge at the registration desk or via email to [registration@sibos.com](mailto:registration@sibos.com). This will not prevent you from accessing the Event. The only information about you that will then be collected by SWIFT will be your picture, name, and QR code on the badge during security checks.

### **2.4. Speakers**

Every year, SWIFT receives names and email addresses of potential speakers directly from either the members of its community or its staff (e.g., relationship managers). The speakers are typically – but not only – industry leaders or influencers who might be invited to speak during the Sibos conference.

If you are a (potential) speaker at the Event we may collect additional information such as details about your work history and education.

Selected speakers will be asked to register to Sibos and therefore comply with the [Sibos Registration Policy](#).

### **2.5. Communications**

If you choose to contact us for any purpose via email, mail, in-app messaging or any other means, we will collect your contact details, your name, and the content, date and time of your message, as well as our reply and any follow up action we take in relation to your inquiry. We also collect information regarding any ratings or comments you make in the Sibos App or online regarding any sessions you have attended during the Event.

## **2.6. Photographs and Videos**

In accordance with the [Sibos Registration Policy](#), we reserve the right to photograph and videotape you at the Event, and use and license such photographs and videotapes for any internal and external communication referring to Sibos (such as on its websites and intranet, on the Sibos Tools, in the Sibos Issues, Sibos Programme, online Exhibition Guide, Wrap-up report, and in its annual reports), as well as on social media channels such as Twitter, Flick'r, SmugMug, LinkedIn, Instagram or YouTube for advertising, promotional or other commercial purposes related to SWIFT's business, product or services. By consenting to the [Sibos Registration Policy](#), you have consented to such uses.

## **2.7. Sibos Instant Messenger**

When you use the "Sibos Instant Messenger" feature embedded in the Sibos App or Sibos.com, we will process your messages as necessary to enable this feature.

## **2.8. Registration by a Central Coordinator**

If you provide, as a Central Coordinator, personal data of another person to SWIFT for registration purposes, you shall ensure that (i) this person has been duly informed about SWIFT's right to process such personal data as set out herein and has been provided with the present Sibos Privacy Statement, (ii) such personal data are collected and supplied in accordance with applicable legislation and without infringing such person's or any third party's rights; and (iii) you have obtained his or her prior consent for registering him or her to Sibos.

In case you are registered to Sibos by a Central Coordinator, you will receive a temporary username and password by e-mail and be requested to change your password upon your first log-in. This will allow you to adapt (where appropriate) your own privacy settings in accordance with the present Sibos Privacy Statement. Note however that the Central Coordinator who has registered you will also still have access to your personal account (with his or her own account and password).

## **2.9. Cookies and Similar Technologies**

For a description of the use of cookies and similar technologies in the Sibos App or Sibos.com, please consult the [Sibos Cookie Policy](#).

## 3. Use of Your Personal Data

### 3.1. Event Organization and Administration

We process your personal data to register you for the Event and manage your participation in the Event, including Event administration, accommodation services, accounting, records keeping, offering Sibos related products and services, responding to your queries and providing customer support.

SWIFT may process personal data of (potential) speakers for the purposes of identifying, selecting and/or confirming speakers, managing the invitations and related logistics (e.g., visa, hotel booking, etc.) and keeping information and statistics about the speakers' history at Sibos (e.g., to ensure a broad variety of speakers throughout the years).

### 3.2. Providing Sibos App, Smart Badge, Instant Messenger and All Related Features

We process your personal data to provide all the Sibos App and Smart Badge features as well as any other tools or features available in connection with the Event. For instance, we may process your activities registered by the Sibos App and Smart Badge to give you points to be converted into a charity donation.

SWIFT may process your personal data as necessary to enable the Sibos Instant Messenger. For more information on this feature, please read the Sibos application's [Terms of Use](#).

### 3.3. Direct Marketing

#### *Sibos Insider*

During the online registration process, you can subscribe to the official Sibos newsletter ("Sibos Insider"). You may additionally subscribe to the Sibos Insider at any time through Sibos.com.

#### *SWIFT Marketing*

You can also subscribe to other commercial mailings and newsletters related to SWIFT's business, products and services by selecting "Yes" in the privacy settings. If you choose "No", you may still share your contact details for marketing purposes with SWIFT by tagging your badge with a beacon at a SWIFT stand at Sibos.

#### *Third Parties Marketing*

Finally, you can as well – in the “privacy settings” step – choose “Yes” to share your contact details with the Sibos Exhibiting Companies and the Sibos Global Media Partners for the purpose of allowing them to contact you directly to present their products and services. By choosing “No” you do not authorize such data sharing. However, even if you choose “no”, you may still share your contact details with Exhibiting Companies by allowing them to scan your badge at Sibos. The Exhibiting Companies will then automatically receive your contact details to send you marketing communications. SWIFT is not responsible for such data disclosure to Exhibiting Companies and Exhibiting Companies’ subsequent processing of your personal data.

### **3.4. Personalising our Services**

We will use the personal data you provide upon registration and in your account to tailor our Services (e.g., based on your profession, demographics or service area). This includes recommending you via the Sibos app other sessions that you might be interested in.

On site, in well-defined areas, we may also assign a colour to the light of your Smart Badge depending on your function so that participants can identify peers. The lights maybe activated during sessions and networking receptions at the Event.

With your consent, we may also analyse your activities at the Event, including your movements at the Event Venue, attended sessions, sessions/speakers/participants flagged as favourites, session ratings and comments, booths visited, contact exchanges, and consumed content on the Sibos App and website, in order to provide you with tailored recommendations for future Sibos events.

### **3.5. Product and Service Development**

SWIFT may analyse participants’ demographic information provided upon registration or in their account, and their activities at the Event including their movements at the Event Venue, for the purpose of evaluating attendance to sessions, performance of the exhibition floor and the Event in general. We will use such data to evaluate the Event, improve and develop SWIFT products and services and organize future Sibos editions.

### **3.6. Ratings and surveys**

Any Sibos participant using Sibos Tools will – on a voluntary basis – be invited to rate the sessions and speakers and to participate to any surveys related to Sibos. The rating and survey results will be aggregated and processed by SWIFT for statistical purposes and published through the Sibos Tools in aggregated form.

### **3.7. Statistics**

Based on your registration data and demographics, statistics will be published on the Event website [www.sibos.com](http://www.sibos.com). These statistics will only

include aggregated data pertaining to the pre-filled sections in the registration form to be selected by the participant.

In addition, SWIFT may create statistical reports based on participants' demographic data and their activities at the Event including their movements at the Event Venue, and share such anonymous reports with exhibitors and other participants (e.g., to show the demographics of participants attending a session), and SWIFT employees.

### **3.8. Security**

#### *Access control*

SWIFT will scan the QR code on the badge to check if the Participant is entitled to attend Sibos.

The badge scanning technology that SWIFT users at Sibos detects your passage through a Sibos checkpoint. Your badge contains merely a unique identifier which is recorded on a central server each time you pass a secure Sibos checkpoint. This allows SWIFT to manage the entrance and security of the Event.

#### *Security Monitoring*

SWIFT may also process personal data for the purpose of event security management (e.g., to prevent security incidents at the Event).

#### *IT Monitoring*

SWIFT will monitor the IT infrastructure of Sibos (e.g. Wifi) in order to verify the adherence to the Sibos [Wi-Fi Acceptable Use Policy](#).

### **3.9. Legal**

We may use your personal data to enforce this Privacy Statement, [Sibos Registration Policy](#), or our [Terms of Use](#), or as necessary to establish, exercise and defend legal rights, and to comply with applicable legal requirements, industry standards and our policies.

## **4. Legal Basis for Using Your Personal Data**

We only process your personal data based on a valid legal ground:

- **Contract**

We need your personal data to provide you with our Services, for example for account registration and management or to respond to your inquiries.

- **Legitimate Interest**

We have a legitimate interest to use your personal data. In particular, we have a legitimate interest to use your personal data for product

development and analytics purposes, to conduct surveys, to personalize our offering, and otherwise to improve the safety, security, and performance of the Services.

We only rely on our legitimate interests to process your personal data when our interests are not overridden by your interests or fundamental rights and freedoms requiring protection of your personal data.

- **Consent**

We may process your personal data based on your consent as explained in this Privacy Statement, for example to send you marketing communications, to use cookies and similar technologies, or to analyse your activities at the Event to provide you with tailored recommendations for sessions at future Sibos events.

- **Legal Obligation**

We have a legal obligation to use your personal data for certain purposes, for example to comply with tax and accounting obligations.

## **5. Disclosure of Your Personal Data**

We may share your personal data as described in this Section 4, or as otherwise notified to you.

### **5.1. Exhibitors**

When you register to the Event you can choose to give your consent to your contact details being shared by SWIFT with all Exhibitors for marketing purposes.

In accordance with the [Sibos Registration Policy](#), Exhibiting Companies can obtain a Lead Retrieval Service by renting a device for the purpose of scanning Sibos participants' badges only on their stand location or at a location where the Exhibiting Company is organizing an event, cocktail or dinner. The Exhibiting Companies are not authorized to use the device in any other area, such as in conference rooms or in the Open Theatre. Scanning of your badge by an Exhibiting Company should only be done with your express consent.

By allowing the Exhibiting Company to scan your badge, you will disclose to the Exhibiting Company your first name, family name, institution, country and e-mail address. Exhibiting Companies may only use such information for the purpose of evaluating attendance and to present their products and services directly to you.

### **5.2. Smart click: disclosure to other Participants**

At the Event, you may "click" your Smart Badge with the Smart Badge of another participant to connect and exchange your contact details (based on



the participant details you provided during the Sibos registration). By doing so, you will exchange contact details including your first name, last name, company address, telephone number(s), photo and email address. These contact details may only be used for one-to-one communications and cannot be used for direct marketing or other commercial purposes.

If you are a speaker at the Event, we may share certain information with the other participants in the Event, including your name, affiliations, and bio, if you have provided one.

### **5.3. Sibos 2019 Participants List and Directory**

#### *Sibos participants list*

The Sibos 2019 participants list includes title, first name, last name, company, ticket details (e.g. day pass, week pass), job title, company email, city, country, country iso code, day present at Sibos (e.g. Monday, Tuesday...), Swift region, Swift sub-region, Sales region, Sales area, Business focus, responsibility, function, institution type, and age range of all participants and will be accessible by all Sibos participants, speakers, Sibos Global Media Partners, and Exhibiting companies (“Sibos Attendees”).

#### *Sibos directory*

During the online registration process, in the “privacy settings” step, you can choose “Yes” to make your e-mail address, postal address and telephone numbers also visible in the participants list. By selecting “No”, this additional personal data will not be included in the participants list. You can view and update your settings and personal data at any time via Sibos.com and the Sibos app until the end of 2019.

### **5.4. Service Providers**

We use third-party service providers to operate and provide our Services. In particular, we work with third parties to provide development, hosting, maintenance, and other services for us. We also use a third party provider to power the Sibos Instant Messenger (e.g., storing the messages on our behalf), and we use a third party provider to operate the localisation feature of the Smart Badge. SWIFT receives from this provider only aggregated and de-identified location information to allow SWIFT to measure Sibos attendance.

These third-party service providers may have access to or process your personal data as part of providing those services for us. We require such providers to only process your personal data on behalf of and under the instructions of SWIFT, and only as necessary to provide their services to us.

### **5.5. Transactions**

Your personal data may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

## **5.6. Legal**

We reserve the right to disclose your personal data that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Services and any facilities or equipment used to make the Services such as Sibos App and Smart Badge features available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others. We may be required by law or requested by (foreign) government agencies, such as law enforcement authorities or customs authorities, for example in the framework of a judicial procedure, to disclose your personal data.

## **5.7. SWIFT's group companies**

We may share personal data with our affiliates, subsidiaries and branch offices to which it is reasonably necessary or desirable for us to disclose personal data in order to carry out the above-mentioned data processing purposes.

## **6. Your Rights and Choices**

You may request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, restrict or object to the processing of your personal data, have the information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your personal data to another company. In addition, you may also have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place.

You may withdraw any consent you previously provided to us regarding the processing of your personal data, at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.

You may exercise these rights by sending your request together with a proof of your identity to SWIFT's Privacy Officer ([privacy.officer@swift.com](mailto:privacy.officer@swift.com)).

Until the end of 2019, you can update your own privacy settings and change your personal data at any time through [Sibos.com](http://Sibos.com).

You may at any time disable the “smart” element of your badge by making such request at the registration desk at the Event Venue, or via email to [registration@sibos.com](mailto:registration@sibos.com). SWIFT will then deactivate the link between the Smart Badge and its system. You can then only use your badge as your name tag for security checks. This is a permanent choice (i.e., it will not be possible to reactive the link with the Smart Badge).

## **7. International Data Transfers**

We may transfer your personal data to a country located outside the European Economic Area or the United Kingdom. We may transfer your personal data to countries for which adequacy decisions have been issued (e.g., Canada), use contractual protections for the transfer of personal data, or rely on third parties’ Privacy Shield certifications, where applicable. You may contact us as specified below to obtain a copy of the safeguards we use to transfer personal data outside of the EEA or UK.

## **8. Links to Third Party Services**

The Sibos App and Sibos website may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators’ policies, if any, governing privacy and security, even if accessed through our Services.

We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Services. We encourage you to learn about third parties’ privacy and security policies before providing them with your personal data.

## **9. Data Security**

We use certain physical, organizational, and technical safeguards that are designed to ensure the integrity and security of the personal data that we process.

In accordance with our [Wi-Fi Acceptable Use Policy](#), the Wifi provided at the Event is monitored for security and quality control purposes. In this regard, only your IP address and traffic data are initially processed. Only if further investigation is needed, your personal details may be used in order to contact you to gather further information or to discuss our concerns or be able to respond to a threat. Illegal use or serious security breaches may be reported to the authorities or any competent law enforcement agency.

## **10. Data Retention**

We take measures to delete your personal data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period.

We generally do not retain personal data for longer than 9 years after the end of the Event. However, messages sent via the Sibos Instant Messenger are only kept for 3 months after the Event. Personal data of potential or confirmed speakers is kept for 5 years after they were added to our database or after the speaker's last performance at Sibos (whichever is the latest).

When determining the specific retention period, we take into account various criteria, such as the type of service provided to you, the nature and length of our relationship with you, and mandatory retention periods provided by law and the statute of limitations.

## **11. Changes to this Privacy Statement**

Please revisit this page periodically to stay aware of any changes to this Privacy Statement. This Privacy Statement will be updated each year. If we modify this Privacy Statement, we will make it available through our website and Sibos App, and indicate the date of the latest revision.

## **12. Contact Us**

The entity responsible for the processing of your personal data as described in this Privacy Statement is S.W.I.F.T. Scrl, located at Avenue Adèle 1, B-1310 La Hulpe, Belgium.

For any questions related to your privacy or this Privacy Statement, you can contact SWIFT's Data Protection Officer by mail at  
Data Protection Officer,  
Avenue Adèle 1,  
B-1310 La Hulpe,  
Belgium,  
or by e-mail at [privacy.officer@swift.com](mailto:privacy.officer@swift.com).