



NOTICE OF PRIVACY POLICY & PRACTICES

Last Updated April 11, 2025

Commitment to Privacy

The Alliance for Innovative Regulation Institute, a District of Columbia nonprofit corporation, (collectively, “AIR,” “we,” “us” or “our”) is committed to responsibly handling personal data¹ that we collect or otherwise process regarding individuals who access or use our services, or otherwise interact with us in connection with (including by applying to, registering for or otherwise participating in) any events we organize, co-sponsor or otherwise participate in, such as sprints, convenings and podcasts (such events, “Events” and such individuals, “you” or “your”).

Our intention with this privacy policy (this “Privacy Policy”) is to provide you with clear, transparent and easily understandable information about how AIR uses and otherwise processes your personal data, and certain rights you may have relating to such use and other processing. We reserve the right to change this Privacy Policy at any time, as circumstances or requirements change. All updates are effective immediately when we provide them to you and they apply on a go-forward basis.

Collection of Personal Data

Certain personal data collected by or on behalf of AIR about you is obtained directly from you, and generally comes from correspondence with you (including, but not limited to, any registration forms and other written, telephone, videoconference or electronic contacts) regarding your access or use of our services or your interactions with us or with non-affiliated third parties. AIR also may collect or receive personal data about you from third parties such as AIR’s business partners (including our partners in organizing or co-sponsoring Events), service providers, vendors, and publicly available sources such as company websites and social media accounts. The personal data we collect about you in the course of your interactions and correspondence with AIR and its representatives includes, but is not limited to, the following:

- basic personal details, including, but not limited to, your name and address (and proof of name and address), email address, telephone number, any other contact details you may supply;

¹ For the purposes of this Privacy Policy, the term “personal data” has the meaning given to such term (or to terms of similar intent, such as “personal information”) under applicable laws and regulations, as and to the extent applicable to your rights and our obligations with respect to such information, including (as and to the extent applicable) “personal data” as defined under the General Data Protection Regulation (EU) 2016/679 or the UK General Data Protection Regulation (i.e., the General Data Protection Regulation (EU) 2016/679 as implemented into the laws of the United Kingdom).



- details of any organization you may represent and your title within such organization;
- personal characteristics, including, for example, your signature and physical characteristics or description;
- photos, video and audio recordings of you during Events;
- opinions, statements or other personal data provided by you or about you during or in connection with Events;
- records of all communications, including, for example, recordings of your attendance (or your representative's attendance) at certain Events or meetings/phone calls, and electronic communications with AIR staff and meeting notes;
- details of any complaints made by you with respect to your dealings with the relevant business partner, service provider or other third party; and
- details of your interactions with the relevant business partner in connection with the services we may provide to you in conjunction with such business partner.

We also collect certain personal data through automatic means when you access or use our services or otherwise interact with us, including the access and use of our websites and other platforms we provide related to the Events. Such personal data using these automatic means may include IP address of the device you use to connect to the Internet, hardware and software settings and configurations, time and date that you accessed or used the website or platform, browser type and language, and the website pages accessed.

In the course of your access or use of our services or your interactions with us, including your participation in Events, you may access or use services, websites or platforms provided by, or otherwise interact with, non-affiliated third parties, such as our service providers and our partners in organizing or co-sponsoring Events. AIR does not control or endorse the services, websites or platforms provided by such third parties, and you acknowledge and agree that AIR has not reviewed the content, quality or other materials that are included in such third-party services, websites or platforms and is not responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with the use thereof. Further, such third parties' collection or other processing of personal data is governed by their respective privacy policies, and you should review any privacy policies of such third parties for further details on how such third parties collect or otherwise process personal data.

Use of Personal Data Collected

AIR uses your personal data to operate its business and for the purposes for which it was provided, including as follows:

- to provide services and information that you have requested or indicated interest in (including, for example, allowing you to register for, interact with and participate in Events);



- to contact you for fundraising and administrative purposes, such as troubleshooting, improving or personalizing our services;
- to send you promotional materials, such as our newsletter and information regarding Events;
- to determine your eligibility to participate in Events;
- to understand and analyze the demographics, usages trends and preferences of individuals who access or use our services, including by participating in the Events;
- to confirm your identity;
- to diversify and balance teams of participants in the Events;
- to detect and prevent misuse or abuse of our services, websites and platforms we provide;
- to collect and process payments;
- to promote the Events;
- to publish content in, or otherwise contribute content to, our or third-party blogs, social media, websites, podcasts and other mediums;
- to generate leads for fundraising purposes and to conduct fundraising, including with personal data we may receive from or share with third parties;
- to fulfill our contractual obligations to other third parties to whom you have provided your personal data;
- to operate our IT systems and safeguard their security;
- for AIR's internal business administration, record keeping, and security purposes;
- for legal and regulatory compliance purposes including, for example, as necessary to respond to governmental, regulatory or law enforcement agency requests or comply with requirements relating to anti-money laundering, politically exposed persons and sanctions checks; and/or
- to provide information, on a need to know basis, to future or potential purchasers or merger partners of all or a portion of AIR, or to provide information as may be necessary in connection with other corporate transactions, such as financings or restructurings.

From time to time, AIR will provide you with information on the services we provide and other activities we engage in, including our fundraising activities, content that we publish, or other Events sponsored by us. You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at any time; however you acknowledge



that such information may be included in general update letters and while you may choose not to receive such updates, we are under no obligation to provide redacted versions of such letters or otherwise create separate reports on your behalf excluding such marketing information. You can also let us know at any time that you wish to change your mind and to start receiving such messages. You can do this by replying directly to the marketing message or at any time by contacting us.

We may aggregate, anonymize or otherwise de-identify your personal data and use it for any purpose permitted by applicable laws and regulations, and we may use information that does not personally identify you for any purpose, except where we are required to do otherwise under applicable laws and regulations. We also may use your information for any other purposes disclosed to you at the time of collection, that you have previously authorized, or with respect to which you subsequently provide your consent.

Consequences of Failing to Provide Personal Data

Providing your personal data is voluntary. If you do not agree with our processing of your personal data as set forth in this Privacy Policy, you should not submit your personal data to us. However, where personal data is required to satisfy an obligation to comply with applicable laws or regulations or a contractual requirement or to participate in an Event, failure to provide such personal data may result in your ability to access or use our services, including participation in the Events. Where there is suspicion of unlawful activity, failure to provide personal data may result in, to the extent permitted under applicable laws and regulations, the submission of a report to the relevant law enforcement agency or supervisory authority. Further, if you exercise your rights in such a manner to prevent us from processing your personal data, please note that we may not be able to perform some of the tasks we need in order to provide certain services to you, including allowing you to participate in Events.

Disclosure of Personal Data

We do not disclose any personal data about you except as detailed in this Privacy Policy. We disclose your personal data to the following categories of third parties:

- vendors and service providers in order for them to provide us with certain services, including, but not limited to: (i) legal counsel, (ii) accountants, (iii) audit firms, (iv) banks, (v) administrators, (vi) tax consultants, (vii) tax preparers, (viii) financial advisors, (ix) persons or entities that are assessing our compliance with industry standards, (x) vendors or service providers supporting our IT systems, (xi) payment processors, (xii) Event organizers and (xiii) other contractors or consultants;
- third parties for purposes of complying with various reporting obligations, and for business, fundraising or marketing purposes, such as sharing Event registration data with our business partners (including our partners in organizing Events) and confirming your participation in Events;



- third parties, such as other individuals participating in Events, for purposes of facilitating, or otherwise in connection with, your participation in Events;
- third parties who subscribe to or otherwise access our content published in, or otherwise contributed to, blogs, social media, websites, podcasts and other mediums (to the extent your personal data is included therein);
- law enforcement agencies and regulators, government agencies or departments or competent authorities of the U.S. or of other countries who request or require such information;
- any person or entity, including, without limitation, any governmental agency, regulatory authority (including, for example, the U.S. Securities and Exchange Commission) or self-regulatory organization having jurisdiction over us, if (i) we determine in our discretion that such disclosure is necessary or advisable pursuant to or in connection with any United States federal, state or local, or non U.S., law, rule, regulation, executive order or policy, including, without limitation, any anti-money laundering law, the USA PATRIOT Act of 2001 or any subpoena, court order or judicial process, and (ii) such disclosure is not otherwise prohibited by applicable law, rule, regulation, executive order or policy;
- future or potential purchasers or merger partners (i) for due diligence purposes on a need to know basis, (ii) as necessary for pre-closing integration planning, or (iii) in connection with the consummation of a sale or merger transaction; and/or
- current, future or potential lenders or other relevant persons as necessary in connection with other corporate transactions, such as financings or restructurings.

In addition, we may disclose personal information directly to law enforcement, regulators or competent authorities, or indirectly to our advisers or service providers who may make such filings or disclosures on our behalf, as follows:

- if we reasonably consider that such disclosure is necessary or advisable to help prevent or detect fraud or other crimes or to protect our rights, property or safety, or that of our business partners, Event participants or others; or
- if we are under a duty to disclose or share your personal data with tax authorities, who may transfer your personal data to the government or the tax authorities in another country where you may be subject to tax.

Personal Data of Children

We do not allow children under thirteen (13) years of age to use our services, and we do not knowingly collect or process personal data from persons under thirteen (13) years of age, and no part of our services are directed to persons under thirteen (13) years of age. If you are under thirteen (13) years of age, then please do not use or access our services at any time or in any manner. If we learn that personal data has been collected through our services from persons



under thirteen (13) years of age and without verifiable parental consent, then we will take steps to delete this personal data. If you are a parent or guardian and discover that your child under thirteen (13) years of age has provided us with personal data, please contact us as described herein to request that we delete the personal data from our systems.

Data Retention

Personal data processed by us will be kept for at least as long as is required for the purpose for which it was collected and otherwise in order to meet our statutory, regulatory, or other obligations under applicable laws and regulations. Further details of our data retention policy is available by contacting us. When determining relevant retention periods, we take into account factors, including, but not limited to, the following:

- our contractual and business relationships with you;
- compliance obligations under applicable laws and regulations to retain personal data for a certain period of time;
- the amount, nature and sensitivity of your personal data;
- the potential risk of harm from unauthorized processing of your personal data;
- statutes of limitation under applicable laws;
- active or potential disputes; and
- guidelines issued by relevant supervisory authorities.

Data Security

We acknowledge that the personal data you provide may be confidential, and we maintain policies and procedures designed to maintain the confidentiality of and protect your personal data in accordance with our normal procedures and applicable laws and regulations.

Unfortunately, the storage and transmission of electronic information is not completely secure. Although we strive to protect your personal data, we cannot guarantee the security of information stored on our or our service providers' servers or transmitted via email; you transmit personal data to us at your own risk.

Additional Information for Individuals Whose Personal Data is Subject to the GDPR or the UK GDPR

Residents of the European Economic Area ("EEA") and the United Kingdom ("UK" and such residents of either, "EEA/UK Residents") have certain rights with respect to their personal data² pursuant to the General Data Protection Regulation (EU) 2016/679 ("GDPR") or the UK General

² For the purposes of this section, "personal data" has the meaning given to such term in the GDPR or UK GDPR, as applicable.



Data Protection Regulation (i.e., the GDPR as implemented into UK law, the “UK GDPR”), as applicable and as further described in this section.

For the purposes of applicable data privacy legislation, AIR is a “controller” of EEA/UK Residents’ personal data. We may transfer, use, store and/or otherwise process your personal data outside of the EEA or the UK, primarily in the U.S. (and may do so in certain other countries), and the laws of the U.S. and certain other destination countries may not offer the same standard of protection for personal data as countries within the EEA or UK. EEA/UK Residents’ personal data also may be processed by staff operating outside the EEA or UK who work for us or for one of our vendors (for example, those who supply support services to us).

In cases of cross-border transfers to countries outside of the EEA or UK, as applicable, if your personal data will be processed in a country with laws that may not be equivalent to, or as protective as, the laws of your home country, AIR will take appropriate steps, in accordance with applicable laws and regulations, to require or maintain an adequate level of protection and security for your personal data. For additional information regarding such steps, please contact us using the details set forth at the end of this Privacy Policy.

1. Our bases for collecting and using personal data

We are entitled to use your personal data in the ways set out in this Privacy Policy on the following bases:

- the use of personal data is necessary for the performance of a contract with you for provision of our products and/or services or to take steps at your request prior to entering into such a contract;
- we have legal obligations that we are required to discharge;
- the use of your personal data is necessary for our legitimate interests;
- you have consented to such use; and/or
- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

If we require your consent to process your personal data and you choose to provide your consent with respect to certain processing of your personal data, you can withdraw such consent at any time by contacting us.

2. Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- request access to your personal data;
- request correction of the personal data that we hold about you;



- object to processing of your personal data where we are relying on a legitimate interest (or that of a third party);
- request erasure of your personal data;
- request the restriction of processing of your personal data; and/or
- request the transfer of your personal data to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights, please contact us using the details set forth at the end of this Privacy Policy. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your personal data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

We will respond to your request within one month of receipt of your request. In some cases, we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

3. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

4. Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other above-listed rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the relevant information. Alternatively, we may refuse to comply with the request in such circumstances.

5. What we may need from you

To access your personal data (or to exercise any of the other above-listed rights), we may need to request specific information from you to help us confirm your identity and ensure your right to access the personal data (or to exercise any of your other above-listed rights). This is another appropriate security measure designed to ensure that personal data is not disclosed to any person who is not entitled to receive it.

6. Right to complain

If you wish to request further information about any of the above-listed rights, or if you are unhappy with how we have handled your personal data, please contact us using the details set forth at the end of this Privacy Policy. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with the GDPR, UK



GDPR or other applicable data privacy legislation, you can make a complaint to the supervisory authority in your country. For example, in the UK you should contact the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/> or 0303 123 1113.

Additional Information for Individuals Whose Personal Data is Subject to the Data Privacy Laws of Other Jurisdictions

To the extent that data privacy laws other than the GDPR or UK GDPR apply to our collection, use, disclosure or other processing of your personal data, you may have certain rights with respect to such personal data (including, depending on the jurisdiction, rights that may be comparable to those of EEA and/or UK residents, as described above). In such case, we will follow such other applicable data privacy laws with respect to your rights, and the description herein of the rights of EEA and/or UK residents, as and to the extent applicable, shall be considered notice of your rights to the extent that we are required to provide you with such notice under such applicable data privacy laws.

Contact Us

Should you have any questions or concerns relating to this Privacy Policy or the processing of personal data we hold about you, please contact us:

By post: 1331 4th St. SE, Apt 905, Washington, DC 20003

By phone: 203-560-9282

By email: elise@regulationinnovation.org

By online form: <https://regulationinnovation.org/contact-us/>

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