# **PRIVACY NOTICE**

# (version 1.0 - as at 3 October 2025)

The Bermuda Environmental Sustainability Taskforce ("BEST") understands that your privacy is important to you and that you care about how your personal information is used and shared. We respect and value the privacy of everyone who visits the BEST website, Facebook or Instagram pages and where your details are included on a database under our control. We will only collect and use personal information in ways that are described here, and in a manner that is consistent with BEST's obligations and your rights under the Personal Information Protection Act 2016 ("PIPA").

BEST is a non-profit registered charity in Bermuda (No. 858), located at Suite 403, 4<sup>th</sup> Floor, International Centre, 26 Bermudiana Road, Hamilton HM 11 ("registered office"). We at BEST work toward our vision for 'a sustainable Bermuda for future generations by providing public awareness campaigns, community empowerment workshops and providing legal expenses for tackling certain environmental cases and general events. The personal information we hold is collected and used with your consent to support our mission and cause.

Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of this Privacy Notice is deemed to constitute consent upon your first use of our website or when we receive your details, and you are directed to this Privacy Notice. If you do not accept and agree with this Privacy Notice, you must stop using our website immediately and inform us that you do not wish for BEST to continue to use any personal information we have collected.

This Privacy Notice is not intended to override the terms of any agreement or other contract which you have with us or any rights you might have available under any applicable privacy or data protection laws.

### 1. Who does this privacy notice apply to?

This Privacy Notice relates to the following types of individuals:

- 1.1. Individuals who are existing, previous or prospective BEST Friends;
- 1.2. Contacts associated with existing, previous or prospective members;
- 1.3. Visitors to our website;
- 1.4. Individuals who contact us with a query, concern or complaint about how personal information is being used;
- 1.5. Individuals who request information from us or permit us to contact them for marketing purposes;

1.6. Employees, contractors and third-party vendors.

#### 2. What does this Notice cover?

- 2.1. This Privacy Notice applies to your use of the BEST website and the storage and use of your personal information.
- 2.2 We may collect some or all of the following personal and non-personal information from persons over the age of 18 years old:
  - 2.2.1. name;
  - 2.2.2. contact details (physical address, email, telephone number);
  - 2.2.3. correspondence data;
  - 2.2.4. limited information provided by the Bermuda Community Foundation in respect to any donation given.
- 2.3 The BEST website contains links to other websites, including Google analytics. Please note that we have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy notices of any such websites before providing any information to them.

#### 3. What do we use your information to do?

- 3.1. Specifically, we may use your information for the following purposes:
  - 3.1.1. To reply to emails from you;
  - 3.1.2. To issue our newsletter and any other information or news to you;
  - 3.1.3. To record attendance at any Lunch & Learn presentations;
  - 3.1.4. To comply with legal obligations and to cooperate with regulatory bodies to which we are subject.
- 3.2. With your permission, BEST may also use your data for marketing purposes which may include contacting you with information regarding our events and news. However, BEST will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure we fully protect your rights and comply with obligations under PIPA.
- 3.3. You have the right to withdraw your consent to BEST from using your personal information at any time, and to request that we delete it.

## 4. Do we share your personal information? Who do we share it with?

4.1. BEST contracts with the Bermuda Community Foundation to facilitate payment processing. In some cases, the Bermuda Community Foundation may require access to some or all of your

personal information. Where any of your information is required for such a purpose, BEST will take all reasonable steps to ensure that your information will be handled safely, securely and in accordance with your rights, obligations and the obligations of the third party under the law.

4.2. Although highly unlikely, in certain circumstances, BEST may be legally required to share certain information held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order or a government authority.

#### 5. How can you control your personal information?

In addition to your rights under PIPA set out in section 9 below, when you submit personal information via <a href="www.best.org.bm">www.best.org.bm</a>, we aim to give you controls over the use of your information, including the ability to unsubscribe as a BEST Friend and cease to receive messages from BEST. Additionally, you may also email us directly at <a href="mailto:office@best.org.bm">office@best.org.bm</a> to request that we cease emailing you.

#### 6. Our use of cookies

- 6.1. The BEST website does not use cookies and collect personal information.
- 6.2. However, the Facebook like button may have cookies with the user validation, and that validation is owned by Google. Furthermore, the BEST website does contain Google analytics, but BEST does not access or use any information collected through that service.

#### 7. How do we use your information?

- 7.1. All personal information is processed and stored securely for no longer than is necessary in accordance with the purpose(s) for which it was first collected. We will comply with BEST's obligations and safeguard your rights under PIPA at all times. For more details on storage, see section 7 below.
- 7.2. BEST's use of your personal information will be because it is necessary for our performance of a contact with you, for the performance of our services or because you have consented to our use of your personal information to contact you (e.g. by signing up as a BEST Friend).

#### 8. How and where do we store your data?

8.1. BEST only keeps your personal data for as long as we need to in order to use it as described above in section 6, and for as long as we have a lawful requirement to keep it.

- 8.2. Some of your personal information may be stored outside of Bermuda in our Google contacts and/or in a Constant Contact database. You are deemed to accept and agree to this by signing up to become a BEST Friend via the BEST website <a href="www.best.org.bm">www.best.org.bm</a>. In the alternative, you are deemed to accept this privacy notice by submitting information to the Bermuda Community Foundation if making a donation via that option. Where BEST does store data outside of Bermuda, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within our requirements under PIPA and according to privacy policies of Google and Constant Contact.
- 8.3. Any data collected before 2018 includes a mixture of paper records and electronic records. These records include names, contact information and records of attendance at events. The paper records are stored at the registered address; and the electronic records are stored in our Google platform. With respect to our paper records and electronic records of BEST Friends, we have taken care to delete and dispose of all personal information in those records, unless the personal information continues to be used by your communication with BEST.
- 8.4. Data security is very important to BEST, and to protect your data, we have taken suitable measures to safeguard and secure all personal data collected by us.
- 8.5. We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required, we will ensure that it is either securely deleted or stored in a way which means it will no longer be used by BEST.

#### 9. Your Rights

- 9.1. As an individual, you have the following rights, which this Notice and BEST's use of personal information has been designed to uphold:
  - 9.1.1 The right to be informed about the collection and use of personal data by BEST (see section 5);
  - 9.1.2. The right of access to the personal data that BEST holds about you (see section 5);
  - 9.1.3. The right to correct, or rectify any personal data held by the BEST if it is inaccurate or incomplete (please contact us using the details in section 9);
  - 9.1.4. The right to ask BEST to delete any personal data held about you. We only hold your personal information for a limited time as explained in section 6, but if you would like us to delete it sooner, please contact us using the details in section 9;
  - 9.1.5. The right to object to BEST using your personal data.

9.2. If you have an issue or complaint about BEST's use of your personal information, please

contact us using the details provided in section 9 and we will do our best to solve the problem for

you. If we are unable to help, you also have the right to file a complaint with the Privacy

Commissioner for Bermuda.

For further information about your rights, please contact the Privacy Commissioner for Bermuda.

10. Contact us

If you have any inquiries or concerns regarding the handling of your personal information, or if there

are any questions or comments about this notice, you may contact our Privacy Officer, Kim Smith

at:

Bermuda Environmental Sustainability Taskforce

Suite 403, 4<sup>th</sup> Floor

International Centre

26 Bermudiana Road

Hamilton HM11

Bermuda

Email: office@best.org.bm

Phone: 441-292-3782

11. Changes to our Privacy Notice

BEST reserves the right to update this Privacy Notice from time to time. Any changes will be

immediately posted on our website with a revised date and will be effective as soon as it is accessible. You will be deemed to have accepted the terms of the Privacy Notice on your first use

of our website following the alterations. We encourage you to review this Privacy Notice frequently

to be informed of how we are protecting your information.

5