

RECC Privacy Policy



REAL ESTATE CYBER CONSORTIUM
(RECC)



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1. Commitment

- A. The Real Estate Cyber Consortium is committed to protecting the privacy and accuracy of confidential information to the extent possible, subject to provisions of state and federal law. Other than as required by laws that guarantee public access to certain types of information, or in response to subpoenas or other legal instruments that authorize access, personal information is not actively shared. We do not re-distribute or sell personal information collected on our web servers.

2. Information we hold

- A. We hold the first name, last name, organization, email, and optionally, office phone, mobile phone, avatar/image, experience level, facility areas of interest, and property size interest, of everyone who registers as a member on our site, all of which come from the individuals themselves. In addition, we capture their acknowledgement of our RECC Privacy Policy, Code of Conduct, and RECC Non-Disclosure Agreement, as required by our membership criteria.
- B. We will share member first name, last name, organization, office phone, and mobile phone with other members of the Real Estate Cyber Consortium (RECC) only if members give us permission to do so. We will not share this data outside of the RECC.

3. Maintain records of processing activities.

- A. The RECC will take all reasonable precautions to prevent the loss, misuse, or alteration, of information you give us. The RECC stores its members' personal data in a secure database managed by Wild Apricot Inc. Renewals and newsletters are generated from the data in this database.
- B. This membership management software provides traffic encryption (https) capability and has security features built into it that conform with General Data Protection Regulation (GDPR). For more information see <https://www.wildapricot.com/gdpr>
- C. Your information will be retained by RECC until you notify us that you no longer wish to receive any information and/or are no longer a member. If you fail to renew your membership without such notification, we will keep your information (archived) for one year in case you decide to renew late.

4. Individual rights

- A. We have checked our procedures to make sure they cover all the rights that individuals have:
 - 1. the right to be informed about collection and use of their data,
 - 2. the right of access to own data and confirmation of processing,
 - 3. right of individuals to have incorrect information rectified within 1 month of request,
 - 4. right to data erasure,
 - 5. the right to restrict the sharing of personal data with others in the RECC,
 - 6. the right to allow individuals to move their own personal data.
- B. If you would like to see the data that we hold, or want us to correct, update or delete any information, or if you wish to raise a complaint on how we have handled your personal data, then please contact our Executive Director by email (support@RECCInc.org) to have your issue remediated.

5. Lawful basis for processing personal data

- A. The Real Estate Cyber Consortium's lawful basis on which we process members data is based on that of a contract as data processing is necessary for contract performance to which the member is party. The member gives consent to the processing of his or her personal data for this purpose.

6. Consent

- A. We review how we seek, record, and manage consent so that consent is freely given, specific, informed, and unambiguous. Members are provided the ability to opt-in or opt-out of communications that uses their data and may withdraw consent for these communications at any time. Member consent is closely tied to RECC participation at any membership level, and if a member determines they wish to revoke their consent, it will be deemed equivalent to the member revoking their RECC membership as member information is the basis for RECC communications and collaborations.

7. Data Breach

- A. The infrastructure provided with the Wild Apricot software puts strong safeguards in place to protect customer privacy. Wild Apricot maintains backup and testing procedures of this information.

- B. For further information please see <https://www.wildapricot.com/security-policy-overview#secure>
- C. If Wild Apricot informs RECC of a data breach, the Real Estate Cyber Consortium would:
 - 1. work with Wild Apricot to establish the nature and extent of the breach,
 - 2. notify affected members, and/or government regulators as required under applicable law,
 - 3. review policies and procedures and amend as necessary.
- D. We will notify RECC members if the breach is likely to result in a high risk to the rights and freedoms of individuals.

8. Data Protection by Design and Data Protection Impact Assessments

- A. The GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'.
- B. The RECC has put in place the following recommendations:
 - 1. that all RECC members maintain up to date antivirus software,
 - 2. that all RECC members will minimize the electronic transmission of members' personal details between them,
 - 3. that sharing of such data will only be on a 'need to know' basis,
 - 4. that an individual member's details will only be shared with other members not on the RECC if the individual has agreed to it.
- C. The RECC has made it a condition of membership that:
 - 1. a member must not share another's personal data with anyone without that individual's express permission, and
 - 2. should a member leave the RECC, they must destroy any personal data of other members that they have gained during their membership, unless those individuals have given their express consent to such retention, and
 - 3. should a member have a password that enables them to access certain parts of the website, they are responsible for keeping this password confidential and should not share the password with anyone.
- D. A Data Protection Impact Assessment (DPIA) is required under GDPR in certain circumstances where processing of data is likely to result in 'high risk' to individuals. Since the Real Estate Cyber Consortium does not plan to process such data, PIAs have not been considered.

9. Data Protection Officers

- A. The RECC has designated someone (currently the RECC Secretary) to take responsibility for data protection compliance. The RECC has not formally appointed a Data Protection Officer (DPO).

10. International

- A. The Real Estate Cyber Consortium is based in the United States but also has Canadian membership.