

## **Eurochild Members Privacy Policy**

This Eurochild Members privacy policy provides details about the personal data the international non-profit-making association known as **Eurochild AISBL** (hereinafter, “Eurochild”, “we” or the “Association”) collects from you as the individual representative of its members (“Member individuals” or “you”).

Members of Eurochild consist of its Effective (Full) Members, Associate Members and Honorary Members.

Membership is available to organisations with legal personality and individuals who can demonstrate they are able to meet the criteria laid down by the Management Board and approved by the General Assembly. The association is open to Belgians and to other nationalities.

Effective Members shall include: NGO’s with an interest in the welfare and rights of children and young people; Statutory bodies with an interest in the welfare and rights of children and young people; Academic and research institutions with an interest in the welfare and rights of children and young people; Professional Associations with an interest in the welfare and rights of children and young people;

Associate Members may include: Government Departments; Any organisation or individual approved by the Management Board, concerned with furthering the objectives of Eurochild;

Honorary Members may include: Any organisation or individual approved by the Management Board, concerned with furthering the objectives of Eurochild.

The aim of this privacy policy is therefore to provide you, as one of these individuals being individual associate member of Eurochild or a representative of a Eurochild member organisation, with transparent and clear information about the data protection practices and policies of Eurochild as the data controller. Eurochild wants to put you in control of your personal data and to let you understand, in accordance with the applicable legislation, how and why we use your personal data. The concept of personal data is broad and encompasses any type of information related to you, as a directly or indirectly identifiable natural person.

We recommend you read this privacy policy carefully in order to better understand our practices regarding the processing of your data. The protection of your data and privacy is of utmost importance for us at Eurochild. We comply with data protection laws, including the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (the “**GDPR**”) and any other applicable national act or regulation regarding the processing of personal data or the protection of privacy.

### **1. Eurochild’s role as a data controller**

The data controller responsible for the processing of your data is Eurochild AISBL, having its registered offices at Rue de la Charité 22 1210 Brussels, Belgium, (postal address: Avenue des Arts 7/8, 1210 Brussels, Belgium).

As a data controller we solely and autonomously determine the purposes and means of the processing of your personal data.

### **2. What data Eurochild collects**

We collect and process your personal data only for the purposes set out in this Policy.

In general, Eurochild is a not-for-profit-making organisation devoted to advocate for children’s rights and well-being to be at the heart of policymaking. Eurochild is a network of organisations working with and for children throughout Europe, striving for a society that respects the rights of children. We influence policies, build internal capacities, facilitate mutual learning and exchange practice and research. The United Nations Convention on the Rights of the Child is the foundation of all our work.

It is in this framework of its general purpose and activities that Eurochild may process certain personal data of its Member individuals. We describe below the categories of data that we process. The data can be either provided directly by yourself as a representative within a member or partner organisation, or potentially gathered from other sources.

Eurochild may process the following personal data about you as a Member individual (or applicant):

Member individuals		
First name, last name	Passport, ID details and verification referencing details	Gender
E-mail address	Travel details	Communications e.g. e-mails
Skype address	Financial information: e.g. bank details	Website usage data, IP address computer
Address, incl. country	National nongovernmental federation; position, Job title	Photos
Name of the (member) organisation	Academic record or qualification/skills; biographical info	As the case may be, any witnessed, suspected or alleged violation of Eurochild's Child Protection Policy which is reported.
Phone and mobile phone numbers	Health information: Disability and Dietary requirements or allergies	

### 3. On which legal basis and for what purposes do we process your data?

We always process your personal data on the basis of and within the boundaries of the legal bases as those are laid down under applicable law. We also ensure to limit the processing of your personal data to what is strictly necessary for the achievement and performance of these purposes.

#### 3.1 Your consent

When we process your personal data, beyond the usual interactions with Member individuals and our institutional communication, we strive to rely on your consent, to put you in control of your personal data. Subject to obtaining your prior and specific consent and in accordance with the applicable law, we may process your personal data:

- such as e-mail address, for instance in order to send you personalised information, newsletters or various publications to which you subscribe;
- to communicate your contact details to the event's participants; or
- to enable Members with certain health conditions to benefit from our services (e.g. participate in events) we may request participants to indicate whether they have specific dietary requirements or other specific needs (e.g. in case of disability)

You always have the right to withdraw your consent at any time.

#### 3.2 Performance of our Legal obligation

We may also process your personal data where this is necessary for the performance of our legal duties such as the fight against fraud and tax evasion. In such a case, we limit the processing of your personal data to the extent of what is strictly necessary.

If a Member individual is eligible for a position in a body or governance body of the Association, the Association may process personal data of the Member individuals for the functioning in its governance bodies, such as Board Members administration, management, voting procedures and related, following from the statutes and the Belgian Code on Companies and Associations.

#### 3.3 Performance of our Contractual obligation

We process Member individuals, personal data for the performance of your contractual relationship with Eurochild. This information can help Eurochild with the administration of certain Member individuals to allow the Association to perform its tasks, services and activities or allow for communications for formal meetings. In particular, this information is needed for and facilitates the general administration/registration of Member individuals.

We may also process your personal data as an individual allowed to access the Eurochild internal website.

We also process personal data for the purpose of the event registration, namely to ensure the good processing and follow-up of your registration form when organising Eurochild's events, but also for

reasons of travel reimbursements, booking of accommodation, transportation, etc. This data is provided directly by Member participating or registering for an event. We limit the processing of event participants' personal data to what is strictly necessary for the achievement and performance of this purpose.

### **3.4 Legitimate interests of Eurochild**

When not strictly necessary for any of the abovementioned reasons, Eurochild may also process your personal data for other purposes, falling under the achievement and the realisation of its legitimate interests. In such a case, however, Eurochild maintains a fair balance between the need to process your data and the preservation of your rights and freedoms, including the protection of your privacy. Whenever this is the case, Eurochild will keep you informed about what type of legitimate interest we are pursuing and provide you with transparent information about the processing operations and your rights.

Against this background, we may process your personal data for the following reasons:

- to manage Eurochild's public relations;
- to manage the communication and updates to Eurochild's Member individuals (news, updates, activities) not falling under the abovementioned communications;
- for direct marketing purposes, including but not limited to, the design and preparation of marketing campaigns, the analysis of the behaviour or preferences of Members based on activities and other parameters and/or interactions with Members, etc.;
- to publish newsletters and website stories;
- to draft and publish Eurochild's annual report;
- to guarantee the security of persons or property;
- to manage Eurochild's litigations, including debt collection and solvency monitoring;
- to manage any incident or allegation of violations of Eurochild's Child Protection Policy;
- to gather input from Member individuals to Eurochild's activities through surveys or by email.

## **4. With whom and how do we share your data?**

Your personal data will never be shared with third parties without your express prior consent. The only exceptions to this apply in the following cases:

### **4.1 For prosecution reasons**

Where required in order to investigate the unlawful use of our services or for the purposes of prosecution, personal data will be disclosed to the relevant law enforcement authorities and, where applicable, to any third-party claimants. However, such a course of action will only take place if there is concrete evidence of unlawful conduct or misuse. In such cases, your data may also be shared if doing so is required for the fulfilment of terms and conditions of use or other agreements. If requested, we are also legally obligated to disclose such data to certain public authorities, such as law enforcement bodies, authorities that penalise offences with financial penalties, and financial authorities.

In these cases, data is disclosed on the basis of our legitimate interest in combating misuse, aiding the prosecution of criminal offences, and aiding the establishment, assertion and enforcement of claims, in line with point (f) of Article 6(1) of the GDPR. If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided below.

### **4.2 Processors**

We rely on contractually bound third-party companies and external service providers (referred to as "processors") in order to provide our services. In such cases, personal data will be shared with these processors in order to allow them to continue providing their services. The processors have been carefully selected by us and are subject to regular audits. The processors are permitted to use the data only for the purposes specified by us. Furthermore, they are contractually obligated to handle your data exclusively in accordance with this privacy policy and in line with the applicable data protection laws.

More specifically, we use the services of the following processors in particular:

- Providers and consultants for conferences, meetings and other types of events organisation (incl. online meetings/webinars services providers);
- service providers for the distribution of newsletters or the execution of surveys;
- service providers for study research, statistics, scientific studies, etc.;
- logistics service providers, for the purpose of sending you materials relating to the Association's activities;

- payment service providers for the purpose of processing all payments from you to us or vice versa;
- IT service providers for the provision of hardware and software, for the implementation of maintenance work and for the use of software as a service applications or tools.

Data is disclosed to processors on the basis of Article 28(1) of the GDPR or, alternatively, on the basis of our legitimate interests in the economic and technical advantages associated with the use of specialised processors and on the basis of circumstances in which your rights and interests in the protection of your personal data are not overridden (see point (f) of Article 6(1) of the GDPR). If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided above.

#### 4.3 Other recipients

Personal data may be shared with other recipients such as

##### (i) the European Commission and other funders for reporting purposes

Data is disclosed to the above recipients on the basis of our legitimate interest in fulfilling our reporting duties towards our funders, such as the European Commission. If you require further information about the balancing of interests that must be carried out in accordance with point (f) of Article 6(1) of the GDPR, please contact us using the details provided below.

##### (ii) partners of the Association and external suppliers (e.g. hotels) for the management of projects and events

Data is disclosed to such recipients on the basis of the performance of our contractual obligation related to the organisation of events and projects.

##### (iii) other participants to the event

Data is disclosed to such recipients to facilitate future contacts if you have given us your consent.

##### (iv) the child's family (or guardian) and the child's supporting organisation in the event of any witnessed, suspected or alleged violation of Eurochild's Child Protection Policy.

Data is disclosed to such recipients on the basis of our legitimate interest in fulfilling our reporting duties.

## 5. What are your rights?

### 5.1 Access, rectification, erasure, portability and objection rights

For all the purposes defined above, and subject to applicable data protection laws, you have the following rights:

- the right to ask us to provide you with copies of personal data that we hold about you at any time, which include the right to ask us: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you;
- where your consent has been given, the right to withdraw such consent at any given time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to erasure within the limits afforded by data protection legislation;
- the right to oppose to the processing of your personal data, within the limits afforded by data protection legislation;
- the right to data portability within the limits afforded by data protection legislation;
- the right to restriction of processing, insofar the conditions under the data protection legislation have been met; and
- the right to opt out of any direct marketing communications that we may send you.

### 5.2 How to exercise those rights?

You may at any time exercise the abovementioned rights in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to [dataprivacy@eurochild.org](mailto:dataprivacy@eurochild.org) or in writing at Avenue des Arts 7/8, 1210 Brussels, Belgium, and subject to complying with our reasonable requests to verify your identity.

### 5.3 Right to lodge a complaint

You can also lodge a complaint to the Belgian Data Protection Authority either by post at Rue de la Presse 35, 1000 Brussels, or by filling in and uploading the online form made available at <https://www.dataprotectionauthority.be/citizen/actions/lodge-a-complaint> or by phone at +32 2 274 48 00 or +32 2 274 48 35.

## 6. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed.

More specifically, we apply the following guidelines:

- Personal data relating to activities and events will be retained for a period of 5 years;
- Personal data used for Member administration are retained for as long as these data are relevant for the execution of our mission (but with a maximum period of 5 years following conclusion of liquidation of the Association);
- Personal data used for information-sharing purposes will be retained for as long as we are sending you relevant mailings/newsletters. As soon as we note that your contact details are no longer accurate or active, or whenever you decide to use your right to unsubscribe, we will no longer keep your personal data for these purposes;
- Personal data relating to suspected or alleged violation of Eurochild's Child Protection Policy will be retained pending the conclusion of the investigation; and
- We may also keep personal data as long as it is necessary to comply with our legal obligations (including bookkeeping, social and tax obligations) or to resolve disputes and/or enforce our rights.

More information on our retention periods is available upon simple request.

## 7. International transfers

In connection with the abovementioned purposes, we may need to transfer your personal data to a country located outside the European Economic Area.

When we transfer personal data that we collect from you to countries that are outside of the European Economic Area, we guarantee:

- the existence of an adequacy decision within the meaning of Article 45 of the GDPR;
- the effective implementation of appropriate safeguards within the meaning of Article 46 of the GDPR, such as the entering into of the standard contractual clauses issued by the European Commission or the establishment of Binding Corporate Rules; and/or
- to the extent necessary, the adoption and implementation of additional measures within the meaning of Recital 109 of the GDPR.

We may also transfer your personal data on the basis of a derogation for a specific situation within the meaning of article 49 of the GDPR.

For further information, including obtaining a copy of the documents used to protect your personal data, please contact us on [dataprivacy@eurochild.org](mailto:dataprivacy@eurochild.org).

## 8. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data, against unauthorised or unlawful processing and against accidental destruction, loss, access, misuses, damage and any other unlawful forms of processing of the personal data in our possession.

## 9. How to contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us via:

[dataprivacy@eurochild.org](mailto:dataprivacy@eurochild.org) or in writing at Avenue des Arts 7/8, 1210 Brussels, Belgium

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